



Planning and Compulsory Purchase Act 2004 (as amended)

**The Town and Country Planning (Local Planning) (England) Regulations 2012
(as amended)**

**Regulation 19 Consultation
Draft Site Allocations Development Plan Document (DPD)**

**Issues and Matters Topic Paper: Summary of Key Issues Submitted with
Officers' Response; and**

June 2019



Introduction

Section 15 of the Planning and Compulsory Purchase Act 2004 (as amended) (Act) requires the Council to prepare a Local Development Scheme (LDS) which must specify amongst other things the development plan documents it wishes to prepare and the timetable for preparing the documents. The Council has an approved LDS (October 2018). The LDS commits the Council to prepare a Site Allocations Development Plan Document (DPD) to identify and allocate sites for development, including housing, employment and infrastructure to cover the period to 2027, in accordance with the requirements, vision and spatial strategy set out in the Core Strategy. It also requires the Site Allocations DPD to safeguard land to meet future development needs between 2027 and 2040. It expects the Site Allocations DPD to be submitted to the Secretary of State for Examination in June/July 2019. A copy of the LDS can be accessed by this link: <http://www.woking2027.info/lds>. Section 19 of the Act expects the Site Allocations DPD to be prepared in accordance with the LDS. The requirement to prepare a Site Allocations DPD to enable the delivery of the Core strategy is reiterated in the Core strategy (Policies CS1, CS6 and CS10). There is therefore a legitimate purpose that is supported by both national and local planning policy for preparing the Site Allocations DPD.

The National Planning Policy Framework (NPPF) requires the Council to prepare a development plan with strategic policies that sets out the overall strategy for the pattern, scale and quality of development. The strategic policies should make provision for housing, employment, retail, infrastructure and community facilities and policies to protect the natural and historic environment. Non-strategic policies should be used to set out more detailed policies such as the allocation of sites. The development plan for the area comprises the combination of the strategic and non-strategic policies. The importance of preparing the Site Allocations DPD to enable the delivery of the Core Strategy again cannot be emphasised enough.

The Council has an up to date Core Strategy that was adopted in October 2012 and reviewed in accordance with paragraph 33 of the NPPF in October 2018. The Core Strategy makes provision for the delivery of the following scale of uses between 2010 and 2027:

- 4,964 net additional dwellings;
- 28,000 sq.m of additional office floorspace and 20,000 sq.m of warehouse floorspace;
- 93,900 sq.m of additional retail floorspace.
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To date (by 2017/18) 2,134 dwellings have been delivered leaving a residual of about 2,830 dwellings that land has to be identified to deliver. The Council has also identified a need for 22 pitches to meet the accommodation needs of Travellers by 2027. The Council is committed to the comprehensive delivery of the above requirements, and the Site Allocations DPD has a clear purpose to allocate land to enable that to be delivered.

The Site Allocations DPD has evolved through various stages. Each stage had been used to inform and improve the subsequent version. A draft DPD was published for Regulation 18 consultation between 18 June and 31 July 2015. About 1,692 individuals and organisations submitted comments comprising 32,712 separate representations. The Council also consulted on the possibility of substituting the sites safeguarded in the draft Site Allocations DPD to meet

future development needs between 2027 and 2040 with land to the east of Martyrs Lane. 3,018 individuals and organisations submitted comments comprising 32,164 separate representations. The representations received during these two separate consultations have informed the Publication Version of the DPD that was published for Regulation 19 consultation between 5 November and 17 December 2018.

2,797 individuals and organisations responded to the Regulation 19 consultation. The representations covered a wide range of issues. The key issues raised are identified and responded to as follows:

- 1 There is no justification for the release of Green Belt land to meet future development requirements in the Borough;
- 2 There is no justification for safeguarding Green Belt land to meet future development needs;
- 3 There is no need to release Green Belt land to meet the accommodation needs of Travellers and/or the Council has failed to consider alternative sites to meet the identified need instead of the proposed allocations in accordance with the sequential approach emphasised in the Core Strategy and other evidence base;
- 4 The proposed allocations will significantly reduce or remove Green Belt land to the detriment of the general wellbeing and amenity of residents;
- 5 The proposals in the DPD will remove a significant proportion of Green Belt land in West Byfleet and Byfleet for development, which is disproportionate and without justification;
- 6 There is no proper assessment of the infrastructure needed to support the Site Allocations DPD and/or no plans have been made to enable adequate infrastructure to be provided to enable the sustainable delivery of the Site Allocations DPD;
- 7 There is no proper assessment of the flood risk implications of the Site Allocations DPD, in particular, regarding the sites in Byfleet and West Byfleet;
- 8 Inadequate consideration has been given to the air quality and noise pollution implications of the Site Allocations DPD;
- 9 The Regulation 19 consultation of the Site Allocations DPD was inadequate;
- 10 There is inadequate evidence base to support the Site Allocations DPD;
- 11 There is a lack of assessment of alternative sites to enable decisions about the preferred sites;
- 12 Criticism about how the Green Belt Boundary Review assessed just parcels (not sites);
- 13 Development will lead to significant levels of congestion and there has not been a thorough assessment of impacts of proposed development on road infrastructure;
- 14 The DPD should allocate more land to meet housing need rather than the Core Strategy requirement. Some specific sites are being promoted.

The list is by no means exhaustive. It is acknowledged that many of the representations also raise site or locally specific concerns. The common issues raised have been identified and responded to in Sections 15 to 24 in this paper. Any remaining site or locally specific issues have been addressed as part of the schedule comprising a summary of the representations received and Officer's analysis with recommendations.

1.0 There is no justification for releasing Green Belt land for development to meet future development requirements of the Core Strategy

1.1 The Council believes that very special circumstances justification exists for the release of Green Belt land for the delivery of housing to meet the development requirements of the Core Strategy between 2022 and 2027 and to safeguard land to ensure the enduring permanence of the Green Belt boundary well beyond this Core Strategy period. The overall principle for releasing Green Belt land to meet housing need between 2022 and 2027 is already established by the Core Strategy and supported by the Secretary of State. The Core Strategy was adopted in October 2012. The Inspector who conducted the Core Strategy Examination had the following to say about the use of Green Belt land for housing ‘the proximity of Green Belt land to Woking creates an inevitability that land within the Green Belt will be required to meet the housing aspirations of the plan and, as discussed above, its designation as a broad location for future growth is consequently reasonable. The Core Strategy will be more precise and effective on the basis that the Green Belt boundary review is undertaken at an early date enabling suitable site identification and phasing, subject to need, for the end of the plan period. Given the availability of fresh data which will indicate the accuracy or otherwise of the anticipated housing trajectory and the need to ensure the permanence of Green Belt boundaries beyond the plan period, the Council may consider it prudent to undertake its Green Belt review in a manner that identifies sites capable of delivering more than the identified minimum requirement of new dwellings’. Policies CS1 (A spatial strategy for Woking Borough), CS6 (Green Belt) and CS10 (Housing provision and distribution) of the Core Strategy provides the overall justification for releasing Green Belt land for development, the requirement for the Council to carry out a Green Belt boundary review to ensure that the land that is released does not undermine the overall purpose of the Green Belt and the overall number of dwellings (550 dwellings) that have to be accommodated in the Green Belt between 2022 and 2027. In accordance with paragraph 33 of the NPPF, the Core Strategy was reviewed in October 2018 and is therefore considered up to date to provide the strategic policy context for preparing the Site Allocations DPD. The review was also undertaken in the context of up to date evidence such as the SHLAA, five year housing land supply position statement and the Green Belt boundary review report and was also demonstrated to be in general conformity with the NPPF. Section 19 of the Planning and Compulsory Purchase Act (2004) and Part 4 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) expects the Site Allocations DPD to take into account the requirements of the Core Strategy.

1.2 The NPPF expects local planning authorities to have a clear understanding of housing needs in their area using the standard method in national planning guidance. They should also prepare a Strategic Housing Land Availability Assessment (SHLAA) to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period. The Council has undertaken these exercises and have met the requirements. The SHLAA can be accessed by this link: <http://www.woking2027.info/ldfresearch/shlaa>. Using the standard method based on the 2014 and 2016 household projections, the estimates for the housing need for Woking are 409 and 264 dwellings per year respectively.

1.3 The Core strategy makes provision for the delivery of:

- 4,964 net additional dwellings, with an affordable housing provision target of 35%;

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

1.4 Taking into account housing completions since the adoption of the Core Strategy, land has to be identified to enable the delivery of about 2,830 new homes by 2027 and 22 pitches to meet the accommodation needs of Travellers. 1,134 dwellings have been delivered to date (2017/18). The Council is expected and committed to the comprehensive delivery of the requirements of the Core Strategy by allocating specific sites to bring forward their delivery. This is necessary to avoid speculative development in unsustainable locations including in the Green Belt and to meet national planning policy requirements. The Site Allocations should be judged on whether it has identified a sufficient deliverable range of sites in sustainable locations in the context of the spatial strategy of the Core Strategy to meet the development needs of the borough.

1.5 The SHMA (2009) that informed the Core Strategy identified an objectively assessed housing need of 594 dwellings per annum. Taking into account the available evidence including an assessment of various options of housing provision and the requirements of the NPPF as whole the Inspector agreed that the Core Strategy should make provision for an annual average housing requirement of *at least* 292 dwellings. Over the plan period between 2010 and 2027 this equates to 4,964 dwellings. The SHMA was reviewed in 2015. The objectively assessed need had reduced to 517 dwellings per year. The Council is now required to use the Government's standard method to calculate its housing need. By using this method, the need comes down to 409 dwellings per year. In all the revised figures, the housing need is higher than the Core Strategy housing requirement (except the one based on 2016 projections that the Government has advised should not be used), leaving an unmet need arising from Woking Borough which the Council has to work with the other authorities in the Housing Market Area to address. Under the Duty to Cooperate the Waverley Borough Local Plan Part 1 has committed to meet 50% of Woking's unmet housing need. The Examination of the Guildford Local Plan has been completed and the Inspector's Report has been published. Whilst the Inspector accepts that Guildford Borough Council has to contribute towards meeting Woking's unmet need, he did not set a specific target for the Guildford Local Plan. He concluded that the unmet need could be met from their supply of housing land. Against this backdrop it will be indefensible if the Council failed to demonstrate that it has identified sufficient land in the Site Allocations DPD to enable the delivery of its housing requirement of at least 292 per year over the plan period. Housing delivery will closely be monitored to ensure the requirement is met.

1.6 The Core Strategy directs most new development to previously developed land in the Town, District and Local Centres, which offers the best access to a range of services and facilities. For the avoidance of doubt, the NPPF defines previously developed land as *'land which is or was occupied by permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where*

the remains of the permanent structure or fixed surface structure have blended into the landscape'. The capacity of the urban area to accommodate further growth has been assessed through the SHLAA. The evidence continues to justify the principle established in the Core Strategy that land will be required to be released from the Green Belt to meet housing delivery between 2022 and 2027, and in particular, the need for family homes that could not be met by high density flatted units at the Town Centre. There is not sufficient deliverable brownfield land to enable a continuous supply of at least 292 dwellings per year throughout the whole of the plan period and to be safeguarded to ensure the enduring permanence of the Green Belt boundary.

1.7 Some representations had claimed that the Site Allocations DPD already allocates sufficient land within the urban area to meet development needs over the plan period and in this regard, there is no need to release Green Belt land for development. The NPPF requires the Council to identify a supply of deliverable and developable sites to meet development needs over the plan period, in this case from now until 2027. In particular, specific deliverable sites should be identified for the first five years of the plan period. Given that the plan period is 2027, there are only eight years to reach its end date and, and seven years if the time that it will take to adopt is considered. It is therefore important that sufficient deliverable and developable sites that have the realistic prospect of coming forward to deliver the homes that are required are identified. Given the nature of brownfield sites, the difficulty associated with their delivery, the lead time that it takes to bring forward such sites and the fact that most of the sites are presently in active use, it is important that sufficient cushion is built into the overall quantum of land that is identified to cater for non-implementation. It is also important to identify a range of sites to meet the variety of housing need across the Borough. In particular, the need for family homes that could not be met in high rise, high density developments at the main urban centres has to be acknowledged and planned. The Green Belt sites will contribute towards the provision of this type of need.

1.8 Apart from the number of dwellings that the Council is expected to identify land to deliver, the proposed housing development in the Green Belt will also help to provide the nature and type of family homes that the community also needs. Most of the housing that will be delivered in the urban area is likely to be high density flatted accommodation. The SHMA demonstrates a clear need for family homes, which the proposed Green Belt sites will help to meet.

1.9 The Council acknowledges that exceptional circumstances case ought to be made to release Green Belt land for housing. The exceptional circumstances case to identify the Green Belt as the future direction of growth to release land for housing development between 2022 and 2027 has been established through the in-principle policies in the Core Strategy (see Policies CS6: Green Belt and CS10: Housing provision and distribution). It was agreed by the Secretary of State that the significant unmet need for housing and the necessity to meet the housing requirement over the plan period provides sufficient justification. Recent reviews of the SHLAA (2014 and 2017) and the assessment of housing need does not provide any significant new evidence that would lead the Council to change this policy approach. In this regard, it will be very difficult for the Council to have a sound Site Allocations DPD without the release of Green Belt land to meet housing land supply over the entire plan period. Without the Site Allocations DPD, there is also the likelihood of uncontrolled speculative development in the Green Belt. The Council can best protect the Green Belt if it can demonstrate that it has identified sufficient land to deliver its development requirements.

1.10 The Council has also undertaken a Green Belt boundary review and other evidence base studies such as the Sustainability Appraisal to demonstrate that special circumstances justification also exist to allocate and/safeguard each of the sites in the DPD. The Core Strategy Examination Inspector provided guidance on how Green Belt sites should be identified for development. He recommended that *'A review of the Green Belt boundary will be carried out to inform the Site Allocations DPD and in any event before 2016/17, to evaluate where it is appropriate to release land in the Green Belt for housing purposes and the size and scale of the release'*. Taken as a whole, not only did the Inspector recommend the release of Green Belt land for housing development, he was also prescriptive about the process and its timing. The preparation of the Site Allocations DPD follows this advice.

1.11 Section 13 of the NPPF deals with the protection of Green Belt land. It accepts that Green Belt boundaries could be altered, only in exceptional circumstances and through the preparation or review of the local plan. Guidance is provided in paragraph 139 on the factors to consider when defining Green Belt boundaries. In particular, it emphasises that when defining boundaries *'Local Planning Authorities should ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development, and where necessary, identify in their plans areas of safeguarded land between the urban area and the Green Belt in order to meet longer-term development needs stretching well beyond the plan period.'* Again, the Council has followed the advice in preparing the Site Allocations DPD. The DPD will not meet the requirements of both Section 5 and paragraph 139 of the NPPF if land is not allocated in the Green Belt to meet development needs over the entire plan period and beyond. Without the allocation of the Green Belt sites to enable the delivery of the Core Strategy, it is unlikely that the Site Allocations DPD would be found sound.

1.12 Based on the above, and in the opinion of the Council, the case for releasing Green Belt land, including safeguarding land to meet future development needs has already been (or can be) established and is consistent with national policy. The Council believes that the sites that are allocated and/or safeguarded are the most sustainable when compared against other reasonable alternatives.

1.13 The Site Allocations DPD is informed by robust evidence, including, the Green Belt boundary review, a Sustainability Appraisal Report, Habitats Regulations Assessment, Transport Assessment and other evidence base listed in Appendix 1 of the DPD. In accordance with the Duty to Cooperate, comments provided by key stakeholders such as the County Council, Natural England, and the Environment Agency have been taken into account before the DPD was published and the Council will continue to involve them at all the key stages of the process. As the DPD evolved, the views of the general public have also been considered and taken into account. Alternative sites have been rigorously appraised in a consistent and transparent manner using a consistent Sustainability Appraisal Framework. Based on the outcome of this exercise and the other supporting evidence, the Council is satisfied that the proposals in the DPD can withstand scrutiny at an examination.

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

1.15 Concern has been expressed about the scale of Green Belt land being proposed to be released for development and in particular, the amount of Green Belt being taken out for development in Byfleet and West Byfleet. These are addressed separately in Sections 4 and 5 below.

2.0 Land should not be safeguarded to meet future development needs beyond 2027

2.1 The enduring permanence of Green Belt boundaries is one of its essential characteristics. The proposed safeguarded sites in the Site Allocations DPD will help achieve this essential aim. The National Planning Policy Framework (NPPF) provides useful policy and guidance about what to do when altering Green Belt boundaries. It emphasises that Green Belt boundaries should only be altered in exceptional circumstances through the preparation of the local plan. At the time, local authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period. Where necessary, local authorities should identify in their plans areas of '*safeguarded land*' between the urban area and the Green Belt, in order to meet longer-term development needs *stretching well beyond the plan period. It should also make it clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a local plan review which proposed the development. They should satisfy themselves that the Green Belt boundaries will not need to be altered at the end of the development plan period*'.

2.2 There is no doubt that there is a great degree of expectation by the NPPF that in altering the Green Belt boundary, sites should also be safeguarded to ensure its enduring permanence well beyond the plan period. In this particular case it will be necessary to safeguard sites GB4 (south of Parvis Road), GB5 (land to the south of Rectory Lane), GB8 (Woking Garden Centre) and GB9 (Land adjacent to Hook Hill Lane) in the Site Allocations DPD to avoid altering the Green Belt boundary again after this plan period. The only situations where safeguarding might not be necessary will be if the Council can demonstrate that it has sufficient sites in the urban area to meet future development needs throughout the next plan period or because of existing constraints no suitable sites can be identified in the Green Belt to meet future development needs beyond this Core Strategy period. Safeguarded sites are also expected to be situated between the urban area and the Green Belt. In this regard, there is clear guidance on where safeguarded land should be identified. The Council cannot ignore this national policy and guidance without substantive reasons to justify doing so if it wishes to have a sound Site Allocations DPD. Based on the available evidence (SHLAA, Green Belt boundary review and significant need for housing) it will be difficult to find any reasons why the sites should not be safeguarded when there is evidence to demonstrate that their release from the Green Belt can be justified by very special circumstances. The Council has rightly made a decision to look beyond the plan period and safeguard land to meet development needs beyond the plan period. Without the safeguarded land, there is the likelihood that the Council will have to carry out another Green Belt boundary review to alter the Green Belt boundary to be able to meet development requirements beyond the present Core Strategy period. Practically, the review will have to be programmed to start a couple of years prior to 2027 when the Core Strategy expires because of the lead time needed to get an adopted plan in place. This will clearly be at odds with national policy for ensure the enduring permanence of the Green Belt boundary. In particular, when it is very unlikely that another Green Belt boundary review will produce a different outcome to the Peter Brett Green Belt boundary review used to inform the Site Allocations DPD.

2.3 Site GB4 (land south of Parvis Road and High Road, Byfleet), GB5 (land to the south of Rectory Lane, Byfleet) and GB8 (Woking Garden Centre, Mayford) have been proposed to be safeguarded in the DPD to help meet development needs of the next plan period. The scale

of the safeguarded land is reasonable, modest against the projected need and is underpinned by careful assumptions to ensure the protection of the Green Belt. It is important to highlight that the Town Centre will continue to be the main focus for future direction of growth through the efficient use of land and the provision of the necessary infrastructure to support the development.

2.4 Overall, the general principle of safeguarding land and the specific sites that are proposed to be safeguarded is defensible, justified by national policy and is also good planning practice.

2.5 The Council has acknowledged the comments made against the merits of safeguarding sites. Whilst the Council is open-minded to carefully consider any alternative proposal such as development at land east of Martyrs Lane to replace the proposed safeguarded sites, no alternative evidence has been provided to demonstrate that the alternative sites can be more sustainably developed than the proposed allocation(s) and/or there would be sufficient land to deliver the quantity and nature of housing that could be needed over the next plan period. The Council accepts that it would be difficult to define precisely what the objectively assessed housing need would be beyond 2027. Nevertheless, given the Government's long term goal to boost significantly the supply of housing, the household projections for the area combined with the high affordability ratio within the borough would suggest that there will continue to be a significant need for housing during the next plan period.

2.6 Others have made the case that the safeguarded sites should be brought forward to increase the housing requirement of the Core Strategy without the need to look far into the future beyond the plan period up to 2027. The NPPF emphasises that safeguarded sites are not allocated for development at the present time. They can only be released for development by the review of the plan. There is a significant degree of national policy protection for safeguarded sites against development. Evidence in the Green Belt boundary review report demonstrates clearly that beyond the sites being allocated and safeguarded in the DPD no other sites can be identified in the Green Belt for development purposes without significant damage to its purpose and integrity. Given that sufficient land has been identified to meet the development requirements of the Core Strategy, and no further land could be identified in the Green Belt without undermining its purposes, bringing the safeguarded sites forward for development before 2027 to increase the housing requirement will mean far more significant unmet need beyond 2027.

2.7 Based on the above, the principle of safeguarding sites is defensible and justified by both local and national planning policy.

3.0 Should Green Belt land be released to meet the accommodation needs of Travellers? The proposed sites for Travellers accommodation are all in Byfleet and West Byfleet.

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

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

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

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

3.3 Section 13 of the NPPF deals with the protection of Green Belt land. Paragraph 83 states that once established, Green Belt should only be altered in exceptional circumstances, through the preparation or review of the local plan. The use of the Site Allocations process to identify sites to meet the needs of Travellers is therefore in accordance with the requirements of the NPPF and the Core Strategy. It is the Council's view that the development of sites allocated through the plan-led process in a local plan where the principle had been established will not constitute inappropriate development in the Green Belt if care had been taken to minimise any adverse impacts of the development and it had been demonstrated that no urban sites could be identified to meet the need.

3.4 The Council has carried out a Travellers Accommodation Assessment (TAA) to determine the scale of need in the area. The TAA is on the Council's website

(www.woking.gov.uk). A need for 19 pitches to be delivered between 2016 and 2027 has been identified. With the loss of Ten Acre Farm, the need is now 22 pitches. The Council has a responsibility to demonstrate that it has identified sufficient sites to meet the identified need. In doing so, the Council has to make sure that sufficient sites have also been identified to ensure the enduring permanence of the Green Belt boundary.

3.5 In accordance with the sequential approach to site selection, the Council has carried out a Strategic Housing Land Availability Assessment (SHLAA) to assess the capacity of the urban area to accommodate projected housing growth at different timeframes. In compiling the sites, some of them were rejected if they were covered by absolute constraints such as European designated sites. The sites were also sustainability appraised against a set of sustainability objectives. The outcome of the exercise is a list of sites that the Council believes their development will help achieve sustainable development of the area with minimum adverse impacts on the sustainability objectives when tested against all other reasonable alternatives. It is from this list of urban sites that the Council has considered the prospect of finding suitable sites for Traveller pitches. The Sustainability Appraisal (SA) Report is on the Council's website.

3.6 To allocate land for development the Council has to be sure that it has a realistic prospect of coming forward for development at the time that it is needed and that the development will be viable. None of the land owners/developers who have submitted sites for consideration in the SHLAA have promoted any of the sites for Travellers accommodation. Desktop search also did not lead to any credible sites that could be viably developed in the urban area. Repeated calls for sites to be submitted for consideration have been unsuccessful. Because of land values, site contexts and constraints none of the urban sites considered are envisaged to achieve positive viability if developed for Traveller pitches. The Council is satisfied that there is a demonstrated lack of deliverable sites in the urban area to meet the identified need to provide a robust case on special circumstances grounds to justify the use of Green Belt land to deliver Traveller pitches.

3.7 Policy CS6: *Green Belt* of the Core Strategy identifies the Green Belt as potential future direction of growth to meet housing need. The next area of search is therefore land in the Green Belt. The Council has carried out an SA of reasonable alternative sites in the Green Belt, and has made a decision that in following the sequential approach to site selection, it will first consider whether legally established sites in the Green Belt have capacity to expand without significant adverse impacts on the environment before new sites in the Green Belt are considered. This approach is in line with the sustainability objectives of the SA Report, the requirements of the Core Strategy, the NPPF and the advice in the Green Belt boundary review.

3.8 Land at Five Acre Farm (GB2) is an operational and an established site authorised for 13 pitches. The proposal is to intensify the use of the site by a net addition of 6 pitches. The site performs reasonably well against the sustainability objectives of the SA Report when compared against other Green Belt sites. Consequently, the Council is satisfied that it should be allocated to contribute towards meeting the identified need for Travellers. There are also existing operational sites with temporary planning permissions at land south of Murray Lane (4 pitches), Stable Year (1 pitch and land south of Gabriel Cottage (1 pitch). It is proposed that the principle for the permanent use of the sites for Travellers accommodation will be supported subject to detailed requirements being met. Land at West Hall is allocated for significant

provision for housing (net provision of 555 dwellings). It is proposed that part of the land, about 1.2 hectares be set aside to provide a net addition of 15 pitches to meet the needs of Travellers. By taking this approach, concern has been expressed that the Site Allocations DPD concentrates all the Traveller sites in Byfleet and West Byfleet, and in close proximity to each other. The Council acknowledges this concern. However, land at Murrays Lane is already a functionally established site with no significant recorded management issues. Land at West Hall is already allocated for housing and can be planned sustainably to accommodate the pitches. It is also not the case that all the Traveller pitches in the Borough would be concentrated in Byfleet and West Byfleet. Taking into account the existing sites, most of the need is being met at Five Acres and Hatchingtan with a combined total contribution of 35 pitches, not to mention Gabriel's Cottage and Stable Yard that are also in the south of the Borough. The Council will continue to work closely with the operators of the sites to make sure that they continue to be effectively managed. The Council is also of the view that the overall environmental benefits for expanding capacity at the existing sites will far outweigh any benefits for spreading the development at new locations in the Green Belt.

3.9 The Council has also carried out a Habitats Regulations Assessment Screening to assess the impacts of the allocation of land at Five Acres and West Hall on European designated sites. The HRA has been prepared with the input of Natural England. The sites have been screened out as having no likelihood of leading to significant adverse effects on European designated sites. Subject to identifying sufficient land to provide Suitable Alternative Natural Greenspace (SANG) to mitigate any adverse impacts on the Special Protection Areas, the Council is satisfied that the sites can sustainably be developed for Traveller pitches. The Council has identified sufficient SANG capacity to support housing provision than is needed in the plan period. Proposals coming forward for permanent use of temporary sites will also be subject to Appropriate Assessment at the Development Management stage to ensure any adverse impacts on European designated sites are avoided.

3.10 The proposed allocations include a list of key requirements to be met to make the development of the site acceptable. This includes making sure that site specific matters such as contamination, flood risk and biodiversity are fully assessed and where necessary mitigation measures identified to address adverse impacts. The requirements will also ensure that the siting, layout and design of the site minimises any adverse impacts on the amenity of nearby residents and the landscape setting of the area. It is also important to emphasise that the sites have been assessed in the context of an up-to-date Strategic Flood Risk Assessment. The siting of the pitches will be in areas with low probability of flooding. The Council is satisfied that the combined effects of these requirements will make sure that the development of the site are sustainable. Measures will also be taken through the development management process to make sure that the temporary pitches satisfies required standards before they are granted permanent approval.

3.11 The Council has considered the merits of the alternative site(s) such as the land east of Martyrs Lane being proposed to replace the proposed allocations. None of the sites are part of established Traveller sites and or in sustainable locations. Evidence in the SA Report and or the Green Belt boundary review does not provide any justifiable case why these alternative sites should be allocated instead of the proposed allocation. There is no alternative evidence submitted to the Council other than the Council's own evidence to demonstrate why these sites can deliver the Council's objectives in a more sustainable manner. Based on the above analysis the proposed allocations should be submitted to the Secretary of State for

Examination. Specific representations have been made generally regarding the allocation and safeguarding of Green Belt land for development and in relation to Travellers accommodation in particular that the Council has failed to provide adequate reasons for not releasing the land east of Martyrs Lane from the Green Belt for development. The Council carefully considered the suitability of safeguarding the land east of Martyrs Lane for future development at its meeting on 18 October 2018 and rejected this proposition for the following reasons:

- The safeguarding of the land for future development will not be justified by the recommendations of the Green Belt boundary review report and other evidence such as the landscape assessment and Green Belt review report by Hankinson Duckett Associates. As a policy requirement, the Core Strategy prescribes the Green Belt boundary review as the means to identify Green Belt land to meet future development needs. No alternative Green Belt boundary review report has been submitted to the Council to demonstrate why the Council's evidence is not tenable. Consequently, the safeguarding of the Martyrs Lane site carries significant risk of being found unsound and might not be able to withstand scrutiny at an examination when compared with other alternatives.
- The development of the site will lead to urban sprawl and an encroachment into the countryside. This will be contrary to the fundamental aim of Green Belt policy as emphasised in the NPPF.
- The development of the whole of the site to include the Golf Course will lead to the loss of a functioning recreational use in contradiction to Policy CS17: *Open space, green infrastructure, sport and recreation* of the Core Strategy. Development of the site north of the Golf Course (excluding the Golf Course) will lead to isolated development in the Green Belt;
- It is unlikely that a significant proportion of the land in the ownership of Zealand Golf Club and McLaren Technologies Group Limited would be made available now or in the future to be developed for housing. There is no realistic or reasonable prospect of the Golf Course or the McLaren site coming forward without the Council using its compulsory purchase powers to acquire part(s) of the land.
- The Council might therefore have to use its compulsory purchase powers to acquire land to enable the delivery of the entire site. A compulsory order application is unlikely to be successful.
- There is relatively limited scope for introducing sustainable transport measures to access key services and facilities as a means to minimise traffic congestion that will result from the development of the site. This is particularly the case with the part of the site north of the Golf Course.
- A number of sites north of the Golf Course have been assessed as part of the SA of the draft Site Allocations DPD and rejected. Safeguarding them for future development will not be justified to promote sustainable development.

It is therefore incorrect to suggest that the Council had failed to provide adequate reasons for not allocating this site for development.

3.12 There are detailed matters such as inability to provide safe access and parking. In any case, they are already specified as key requirements for making any development that comes forward acceptable. The Council is confident that these matters can successfully be address as part of the development management process.

3.13 Beyond the allocation of sites, the Council recognises the work that needs to be done to improve relations between Travellers and the settled community, and will continue to engage in this work.

3.14 There have been calls for the Council to review its TAA to take into account the revised definition of Travellers. This matter has been carefully considered and it is envisaged that the outcome of such a study would not change the overall quantum of the need for Travellers accommodation.

4.0 The proposed allocations will significantly reduce or take away Green Belt land to the detriment of the general wellbeing and amenity of residents.

4.1 The Council accepts that any land taken out of the Green Belt will lead to a reduction of the total amount of Green Belt land and the benefits it brings to the particular communities where the land is situated. Whilst the Council sympathises with this concern, it has ensured through a number of studies that any land that is released from the Green Belt will not undermine its overall purpose and integrity. Taking into account the constraints of the Borough and the available evidence, the proposed allocations are the most sustainable to deliver the objectives of the Core Strategy when compared against other reasonable alternatives. The Sustainability Appraisal Report and the Green Belt Boundary Review provides the evidence to support this view. Whilst not underplaying the significance of the benefits of Green Belt land to individual local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet development needs up to 2040 is about **1.93%** of the total area of the Green Belt. Presently, the Green Belt is about 63.27% of the total area of the Borough. When all the allocated sites have been developed the Green Belt will be about **61.34%** of the total area of the Borough. The amount of land being proposed to be released is therefore relatively modest.

4.2 While there is a loss of open space and Green Belt land, the Council seeks to ensure that sufficient high quality open space and green infrastructure is available to meet the open space and recreational needs of both existing and future residents, as set out in Core Strategy Policy CS17: Open Space, green infrastructure, sport and recreation. This is reinforced by Development Management Policies DPD Policy DM1: Green infrastructure. These policies, together with key requirements in the Site Allocations DPD, set out how this will be achieved. Sites such as West Hall (Policy GB10) outline that approximately 4.7ha of public open space and green infrastructure should be integrated at the site, and that large areas of woodland and parkland setting should be retained. Further detail can be found in paragraph 6.8 of this paper.

5.0 West Byfleet and Byfleet is losing most of its Green Belt for development

5.1 The Council has decided through the Core Strategy that the significant unmet need for housing justifies the in principle need to release Green Belt land for housing development. In doing so it has ensured that first and foremost development is directed to the most sustainable locations of the Borough in accordance with the spatial strategy of the Core Strategy. The Council accepts that the proposed allocation of sites for development is not evenly spread across the Borough. This could not be achieved because of the uneven distribution of constraints and the need to make sure that development is directed to the most sustainable locations when compared against all other reasonable alternatives. More importantly, the Council has to make sure that any land that is released from the Green Belt does not undermine its overall purpose and integrity. It is within this broad spatial strategic context that sites are allocated or safeguarded for development.

5.2 The Site Allocations DPD proposes to remove 43.5% of the existing Green Belt in the ward of West Byfleet (based on the previous Ward boundaries). Excluding site GB18 which will not be developed and will continue to provide open space and sports provision for the Junior and Infant schools, the total amount of Green Belt lost for development in West Byfleet is 37.8% (45ha). Whilst the Council sympathises with the concerns of local residents over the loss of this amount of Green Belt land, it has ensured through a number of studies that the land that is released from the Green Belt will not undermine its overall purpose and integrity.

5.3 In Byfleet, the Site Allocations DPD proposes to remove 18.3% of the existing Green Belt in the ward of Byfleet (based on the previous Ward boundaries). Excluding site GB12 which will not be developed and is proposed to be used as publically accessible natural greenspace (SANG), the total amount of Green Belt to be lost to development in Byfleet is 7.3% (10.26ha).

6.0 There is lack of adequate infrastructure provision to support the Site Allocations DPD

6.1 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. 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.

6.2 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 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 November 2018 to bring it up to date and therefore provides a robust basis for supporting the delivery of the Site Allocations DPD. The IDP sets out:

- 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. This includes the scale of the new infrastructure to be provided, by whom, how, at what cost and to what timescales.

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

6.3 The IDP is informed by a number of studies such as a Green Belt boundary review sensitivity teas - addendum report to Strategy Transport Assessment (2016), Surrey rail Strategy Position Statement, Woking Town Centre Modelling Assessment (2016), Network Rail Route Strategic Plan – Wessex Route (2018, A320 Corridor Study, A245 Potential Mitigation Study, Transport Assessment (2010), an Open Space audit (and Social and Community Facilities Audit (2011), Surrey Infrastructure Capacity Study and relevant information from key providers. The Council accepts that the IDP will continue to evolve with new information. Nevertheless, overall, the IDP provides adequate information on

infrastructure provision to support the delivery of the Core Strategy and the Site Allocations DPD.

6.4 The Council has worked with its partners to publish specific strategies and programmes to provide further details on how some of the infrastructure will be delivered. This includes:

- A Regulation 123 List with an indication of the priority infrastructure that the Council wishes to spend Community Infrastructure Levy contributions. The Regulation 123 list includes the list of schemes to be delivered, by whom, when, how, at what cost and how it will be funded. It is estimated that approximately £14M could be secured from CIL contributions over 10 years up to 2025 towards infrastructure provision;
- Woking Transport Strategy and Programme published by Surrey County Council, which sets out transport schemes that the County Council have identified to address the infrastructure requirements of the Core Strategy. The document takes a balanced approach with an appropriate range of schemes that includes pedestrian, cycling, road network and rail to deal with the transport implications of proposed development;
- Thames Basin Heaths Special Protection Areas (SPA) Avoidance Strategy published by Woking Borough Council to set out how Suitable Alternative Natural Greenspace will be provided to mitigate against development impacts on the SPA. The Council has identified sufficient Suitable Alternative Natural Greenspace (SANG) capacity to cover the entire plan period. The Avoidance Strategy is being reviewed;
- County Council's Education Programme on education provision across the Borough.
- The Council is working with Network Rail to delivery significant improvements to the rail network and other transport improvements in the vicinity of the Station. This includes the replacement of the Victoria Arch Bridge, the introduction of two-way carriageway under the Victoria Arch Bridge, the removal of the one-way gyratory and improvements to pedestrian and cycle connectivity between the north and south of the Station.

6.5 Whilst the above is non-exhaustive, they provide adequate information to demonstrate how key infrastructure will be secured to enable the sustainable delivery of the Core Strategy and/or the Site Allocations in a timely manner.

6.6 The Council has used the Site Allocations DPD process to review a number of the evidence to assess the development impacts of the proposed allocations and to address any further infrastructure that will be needed to mitigate potential adverse impacts.

6.7 The Council has carried out a revised Green Belt Boundary Review Sensitivity Test – Strategic Transport Assessment (TA) (2015) to assess the transport implications of the proposed allocated and safeguarded sites. The TA acknowledges that there will be a net but marginal increase in traffic over and above the existing situation, which could be mitigated to enable the delivery of the proposed allocated sites. The mitigation measures will comprise both strategic schemes to be funded by developer contributions and other sources of funding and by site specific measures to be determined as part of detailed Transport Assessments to support planning applications. Specific requirements have been incorporated in the relevant proposed allocations to make sure that development impacts are fully assessed and appropriate site specific measures are identified to address any adverse impacts. The County Council as Highway Authority for the area is satisfied that the approach to mitigation taken by

the Council will minimise any adverse traffic impacts of the DPD to enable development to be acceptable in transport terms.

6.8 Policy CS17: *Open space, green infrastructure, sport and recreation* of the Core Strategy provides a robust policy framework for securing and protecting open space provision in the Borough. The Regulation 123 List quantifies what is needed and how that will be funded. The Council has also identified sufficient Suitable Alternative Natural Greenspace (SANG) capacity for recreation and to mitigate development impacts on the Thames Basin Heaths Special Protection Areas.

6.9 Surrey County Council is the main provider of Education in the area. It provided detailed assessment of education needs to support the Core Strategy. It is satisfied that the combination of expanding capacity at existing schools and the allocation of the nursery land adjacent to Egley Road (site GB7) for a secondary school in the DPD will meet the education needs of the area for the plan period.

6.10 Affinity Water (Veolia Water) had confirmed that based on the projected growth in the Core Strategy there is no risk to the supply of water over the plan period.

6.11 The Thames Water AMP5 (2010 – 15) had informed the Core Strategy. At the time, it showed that there were no capacity issues. Thames Water has also provided input to the preparation of the Site Allocations DPD in its response to the Regulation 18 consultation. They have provided a robust wording for the Council to incorporate in the DPD to make sure that the wastewater and sewerage infrastructure needs of development are fully assessed and where necessary mitigation provided as part of the planning application process. They have also responded to the Regulation 19 consultation, and their representations will be taken into account. Together with the introduction of SuDS, which Thames Water support, the Council is satisfied that wastewater and sewerage issues will be addressed at the planning application stage.

6.12 The IDP notes that at present, GP provision varies across the Borough. It is accepted that there are locally specific pressures of over-subscription that need to be addressed. Whilst traditionally health provision reacts to meet projected demand, the Council is working with the North West Surrey Clinical Commissioning Group (CCG) to see how provision could be aligned to proposed development and avoid unacceptable standards of provision in the area. The CCG is aware of the total quantum of development that the Core Strategy seeks to deliver, and the likely spatial distribution of cumulative development as proposed in the Site Allocations DPD. 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 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.

6.13 The Council is by no means suggesting that the approach it has taken to mitigate development impacts of the Site Allocations DPD will be a panacea to address deficiencies in existing infrastructure provision. Nevertheless, it will ensure that the existing situation is not exacerbated and the negative impacts of any future development are minimised. In summing

up for his consideration of infrastructure matters at the Core Strategy Examination, the Inspector concluded that the Core Strategy addresses adequately the provision of infrastructure to support the delivery of the strategic objectives of the Core Strategy.

7.0 There is no proper assessment of the flood risk implications of the Site Allocations DPD, in particular, regarding the sites in Byfleet and West Byfleet

7.1 The NPPF requires development to be diverted away from area at highest risk of flooding. Where development is necessary at high risk areas, they should be made safe for its lifetime without increasing flood risk elsewhere. Strategic policies are expected to be informed by a strategic flood risk assessment. All plans are required to apply a sequential, risk based approach to the location of development, taking into account the current and future impacts of climate change, so as to avoid, where possible, flood risk to people and property.

7.2 The Council attaches significant importance to flood risk because of its potential threat to the livelihood of residents and local businesses. In this regard, the advice in the NPPF has been carefully followed, and the Site Allocations DPD directs development to areas with the lowest probability of flooding from all sources.

7.3 The Site Allocations DPD is informed by an up-to-date Strategic Flood Risk Assessment (2015). A Sequential Test has been applied to determine the suitability of sites according to their susceptibility to flood risk. The Environment Agency had been consulted on the Sequential Test. The Sequential Test demonstrates that the Exception Test will not be required for any of the proposed sites in the DPD where development is proposed.

7.4 The functional floodplain had been considered an absolute constraint and sites within it had been ruled out for consideration as reasonable alternatives for the purposes of the DPD. The defined areas of the allocated sites where development will be required to be sited are all in Flood Zone 1 where development is encouraged. Full consideration has also been given to the assessment of alternative sites through the Sustainability Appraisal (SA) process where flood risk is one of the key objectives against which all alternative sites were appraised.

7.5 Where relevant, the key requirements of the proposed allocated sites sets out conditions for the need for detailed flood risk assessment. This will ensure that the development of the site addresses any site specific issues relating to flood risk, including making sure that the development of the site do not exacerbate flood risk elsewhere. The Site Allocations DPD has evolved and it incorporated comments received from the Environment Agency to help make sure that the requirements of national policy are met. Based on advice provided by the Environment Agency during the Regulation 19 consultation, it is being proposed to include a further key requirement requesting for a sequential test to be undertaken at the development management stage.

7.6 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.

7.7 Based on the above, Officers are satisfied that flood risk has been sufficiently, adequately and appropriately considered in the preparation of the DPD and the development of the allocated sites will not lead to or be exposed to unacceptable level of flood risk. The Council has acknowledge concerns of local residents regarding flooding in particular in Byfleet and West Byfleet. The DPD takes due care to make sure that the risk of flooding is minimised.

8 Inadequate consideration has been given to the air quality and noise pollution implications of the Site Allocations DPD

8.1 Careful consideration has been given to the air quality implications of the Site Allocations DPD. The assessments include both the impacts on habitats and the wellbeing of residents.

8.2 In terms of implications on habitats, air quality impacts of the Site Allocations DPD have been appropriately assessed as part of the Habitats Regulations Assessment, available to read at the following link: <http://www.woking2027.info/ldfresearch/hra/sadpdhra>. Modelling of transport movements and associated air quality undertaken in support of Woking Core Strategy, subsequently updated to support the Site Allocations DPD, concluded that no significant adverse effects would occur on European protected sites as a result of development proposed in the Borough. The assessment also took into account 'in combination' effects with growth in surrounding authorities. The Council will continue to work proactively with other Surrey local authorities and Natural England to strategically monitor and mitigate any adverse impacts on the SPA, as recommended in the HRA report.

8.3 In terms of implications for health and wellbeing of residents, air quality impacts of each site have been assessed through the Sustainability Appraisal. Air quality in the Borough is generally good – nitrogen dioxide diffusion tubes are located throughout the borough which are changed on a monthly basis. Only two areas of the Borough have in the past not met the government's standards, and have been declared Air Quality Management Areas (AQMA): the junction at the top of Anchor Hill, and a section of Guildford Road. Steps are being taken to improve air quality at these locations. None of the sites proposed in the Site Allocations DPD are situated within an AQMA; are expected to adversely impact an AQMA; or to lead to designation of an AQMA.

8.4 It is acknowledged that there are potential implications for air quality arising from increased traffic associated with development. The Site Allocations DPD aims to concentrate most development in the main centres where key facilities and services are available, which reduces the need to travel. In addition, policies in both the Core Strategy (such as CS18: Transport) and Development Management Policies DPD (such as policies DM5: Environmental Pollution and DM6: Air and Water Quality) seek appropriate schemes of mitigation to minimise any adverse impacts on the environment from individual and cumulative development. Policy DM6 requires an Air Quality Assessment to be submitted for schemes in excess of 10 dwellings or 1,000sqm of 'other' floorspace within or adjacent to AQMAs; and for all schemes in excess of 100 dwellings or 10,000sqm of 'other' floorspace anywhere in the Borough. If a change in air quality is identified, a suitable scheme of mitigation should be put forward. These mitigation measures are reinforced by the 'key requirements' of each site allocation.

8.5 The combined effect is that air quality will not be affected to the extent that there will be a significant impact on the health and wellbeing of residents.

8.6 Noise issues were considered as a factor to assess site suitability in the Green Belt Boundary Review, and assessed to be a constraint on the parcel which included sites GB4 and GB5, although the review stated that this issue could be satisfactorily mitigated. It was also identified as a landscape issue affecting the parcel that includes sites GB10 and GB11.

8.7 The Sustainability Appraisal considered noise pollution and identified it as an issue affecting sites including GB1, GB4, GB5, GB7, GB10 and GB11. It recommended various mitigation measures, including requirements for Noise Impact Assessments, and these have been incorporated as key requirements for the policies for GB1, GB7, GB10 and GB11. Key requirements for the development of sites GB4 and GB5 will be defined as part of the review of the Core Strategy or Site Allocations DPD. This will be informed by the up to date evidence and policies at the time.

8.8 With regard to the current noise buffering role played by vegetation on sites GB10 and GB11, the allocation policies for these sites include significant measures by way of key requirements for the retention and expansion/strengthening of green infrastructure features, including woodland, tree belts, protected trees, landscape edges, wildlife corridors and off-site Green Infrastructure acting as a buffer to the Wey Navigation.

8.9 The addition of vehicles to the local road network as a result of proposed development has also been raised by consultees as a potential cause of noise pollution. Noise Impact Assessments, as required for sites GB1, GB7, GB10 and GB11, would identify, and specify mitigations for, any such impacts. More generally, the Strategic Transport Assessment, A320 Corridor Study, A245 Mitigation Study and Town Centre Modelling Assessment have assessed the impact of the proposed developments on traffic and proposed various mitigation measures to keep the impacts on traffic to an acceptable level.

8.10 Any scheme that comes forward through the development management process will also be required to take account of Policy DM7 (Noise and Light Pollution) of the Development Management Policies DPD and Policy CS21 (Design) of the Core Strategy.

9.0 Was the regulation 19 consultation of the Site Allocations DPD adequate?

9.1 The minimum level of public consultation required for a Regulation 19 consultation on a draft Development Plan Document such as the Site Allocation Development Plan Document (DPD) is prescribed by the Town and Country Planning (Local Planning) (England) Regulations 2012. The Council has also published a Statement of Community Involvement setting out how the community will be involved in the preparation of key planning policy documents. The Council published the DPD for a six weeks Regulation 19 consultation period between 5 November 2018 and 17 December 2018, and have carried out the following events, which it considered were successful:

- Sending direct mails to about 6,000 individuals or organisations on the consultation database;
- Depositing copies of the Site Allocations and its accompanying supporting documents at the main libraries across the Borough for public inspection;
- Doing presentations to local community groups, Resident Associations, Neighbourhood Forums, Agents Forum and the Chamber of commerce;
- Depositing information at places such as Shopping Centres, rail stations, community noticeboards
- Putting the Site Allocations DPD on the Council's website;
- Publishing press notices and the Statement of Representation Procedure in the local newspapers;

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

9.3 The Council is satisfied that it has done what it can within the available resources but has gone beyond the statutory requirements to engage the community during the Regulation 19 consultation. It has done so in accordance with the Statement of Community Involvement and all other statutory and policy requirements. The Council is also satisfied that sufficient time had been allowed for the consultation and the consultation events were spread across the borough and amongst various groups to give everyone the opportunity to participate.

9.4 In accordance with the Local Development Scheme the Council plans to submit the DPD to the Secretary of State for Examination in June / July 2019. Everyone will have the opportunity to be heard at the examination if they felt that their concerns have not been satisfactorily addressed by the Council at the Regulations 18 and 19 consultation stages. The examination process is a further opportunity for the public to be involved in the DPD preparation process.

10.0 The evidence base used to support the Site Allocations DPD is inadequate and not robust

10.1 Paragraph 31 of the NPPF requires the preparation of local plans to be underpinned by relevant and up to date evidence. The evidence should be adequate and proportionate, focused tightly on supporting and justifying the plan.

10.2 The Council is satisfied that the depth and breadth of evidence used to support the preparation of the Site Allocations DPD was sufficiently comprehensive, robust and will be able to withstand scrutiny at the Site Allocations DPD Examination. The list of evidence base studies used to justify the DPD is at Appendix 1 of the Site Allocations DPD.

- Strategic Housing Land Availability Assessment (SHLAA) (2017);
- Strategic Housing Market Assessment (SHMA) (2015);
- Green Belt boundary review (2014);
- Landscape Assessment (2014);
- Strategic Transport Assessment (2015);
- Travellers Accommodation Assessment (2013);
- Sustainability Appraisal Report (2018);
- Habitats Regulations Assessment (2018);
- Employment Topic Paper (2018);
- Standard method for calculating housing need;
- A320 Corridor Study;
- A245 Mitigation Study;
- Infrastructure Delivery Plan (2018);
- Surrey Infrastructure Study
- Woking Transport Strategy and Programme;
- Strategic Flood Risk Assessment (2015) and Sequential Testing of Sites in the Site Allocations DPD (2018); and
- Technical information captured from statutory consultees, neighbouring authorities and other key stakeholders during Duty to Cooperate exercises.

10.3 The evidence gathered is sufficiently comprehensive, adequate, proportionate and robust enough to inform planning judgments about the preferred sites in the DPD. They have all been prepared to high quality standards to meet all necessary requirements. It is an extensive list of studies and covers evidence base studies required or suggested by national guidance such as SHLAA and SHMA. The breadth and depth of the evidence base studies reflect the nature and issues that are pertinent to the preparation of the DPD. The evidence base required by the SEA Directive has also been covered as part of the Sustainability Appraisal Report and the Habitats Regulations Assessment. Information gathered from the responses to the Regulations 18 and 19 consultations have also been useful source of evidence to inform the DPD process. Overall, Officers are satisfied that the DPD is adequately and appropriately informed by robust and up-to-date evidence base.

10.4 A number of the representations has expressed concern that no traffic modelling has been undertaken to assess the traffic impacts of the development proposals. The Council disagrees. There has been extensive traffic modelling works undertaken to inform the DPD. This includes:

- Green Belt boundary review Sensitivity Test – Strategic Transport Assessment;
- County Highway Authority Green Belt boundary review Sensitivity Test – Addendum Report to Strategic Transport Assessment;
- Woking Town Centre Modelling Assessment;
- Strategic Transport Assessment – cumulative assessment of future development impacts on the highway network;
- Transport Assessment;
- Potential Mitigation – Transport Infrastructure Mitigation Measures for A245;
- A 320 Corridor Study.

Full details of the evidence base can be accessed by this link:
<http://www.woking2027.info/ldfresearch>.

11.0 There has not been a thorough assessment of reasonable alternative sites to inform the selection of preferred sites

11.1 The SHLAA, Employment Land Review, Green Belt boundary review report and the Sustainability Appraisal Report provides evidence of work undertaken to assess the capacity of both the urban area and the Green Belt to accommodate the projected growth set out by the Core Strategy. The spatial strategy of the Core Strategy seeks to concentrate most new development on previously developed land in the town, district and local centres which offers the best access to a range of services and facilities. However, it recognises that land in the Green Belt will have to be released to meet housing need between 2022 and 2027. This overall spatial framework has informed the appraisal of options regarding the prioritisation to focus development up to 2022 within the urban area.

11.2 The Sustainability Appraisal (SA) process has been used to appraise reasonable alternative sites to inform the Site Allocations DPD. The SA Framework used for the appraisal of the alternative options is objective-led and has provided a consistent basis for describing, analysing and comparing the sustainability effects of the various options and the specific proposals of the Site Allocations DPD. The SA Report is on the Council's website. It includes all the reasonable alternative sites that were appraised and why sites have either been selected or rejected.

11.3 The Strategic Housing Land Availability Assessment (SHLAA) and the Employment Land Review (ELR) has provided the basis of the reasonable alternative sites appraised. The SHLAA adopts a comprehensive methodology to assessing sites, including density and potential housing yield. It represents an adequate, proportionate and robust source of evidence to inform the Site Allocations DPD process. The methodology used for the SHLAA has been commended by the Inspector who conducted the Core Strategy. In this regard, the Council is satisfied that the SHLAA does not need an independent verification of either its process or its outcomes. The ELR is also a consultant's report prepared to high quality standards.

11.4 To make the Site Allocations DPD and appraisal process manageable, only reasonable alternative sites that will yield 10 dwellings or more or 500sq.m or more of employment floorspace were appraised. Sites in both the urban area and within the Green Belt were appraised. Every site with a realistic prospect of coming forward during the plan period that the Council is aware has been appraised before preferred sites were selected for the DPD. It is important to acknowledge that whilst the focus has been on sites for residential development, the Council also has a responsibility to identify sufficient land to meet the economic, social and environmental requirements of the Core Strategy.

11.5 The Green Belt boundary review assessed various parcels of land against various sets of criteria to make sure that any land that is released from the Green Belt will not undermine its purposes and integrity.

11.6 Overall, the Council is satisfied that there has been a thorough assessment of alternative sites to inform the preferred sites that are allocated and safeguarded in the Site Allocations DPD. Whilst most development will be focused on previously developed land in the urban area, the need for land to be released from the Green Belt continues to be justified.

11.7 Some representations had claimed that the Council should have engaged independent consultants to undertake a 'proper' SHLAA to assess the scope for brownfield land to accommodate the future development needs. The Council has published an up to date SHLAA to identify deliverable and developable sites to meet future development needs. The SHLAA was undertaken in-house and is considered robust and adequate to inform the DPD. It is based on a tried and tested methodology that has been commended by the Secretary of State. The Inspector has this to say about the methodology used for the SHLAA: 'it adopts a comprehensive methodology to assessing potential housing sites within the Borough. There is no substantive evidence to indicate that its density and housing yield assumptions, with due regard to exemplar schemes and the housing mix requirements proposed by the Core Strategy is flawed. With regard to the NPPF, it represents an adequate, proportionate and robust evidence source'. The Council has the expertise and resources to carry out the SHLAA. It would be a waste of public money in these circumstances to engage consultants to do the study.

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

12.1 The Green Belt boundary review is a key policy requirement of the Core Strategy. Policies CS1 (A spatial strategy for Woking Borough) and CS6 (Green Belt) expects the Council to carry out a Green Belt boundary review before 2016 to ensure that the release of Green Belt for development does not undermine its purposes and integrity. The requirement was a key recommendation of the Inspector who conducted the Core Strategy Examination.

12.2 Peter Brett Associates were commissioned to carry out the Green Belt boundary review. The consultants' brief was approved by the Local Development Framework Working Group. The Working Group considered the consultants' report and was satisfied that it had been prepared in accordance with the brief, and that the report provides a useful evidence base to inform the Site Allocations DPD. It is important to emphasise that Officers reviewed a number of examples of Green Belt boundary reviews before finalising the brief for the consultants. The Council believes that the Green Belt boundary review report is robust to inform the DPD and to make sure that any land that is released from the Green Belt does not undermine its purposes.

12.3 There is no prescribed methodology for carrying out a Green Belt boundary review. The Council had been concerned to ensure that the review is founded on a robust and credible methodology. In this regard, the consultants published the methodology for carrying out the Green Belt boundary review for stakeholder consultation to make sure that all technical aspects of how to carry out a Green Belt boundary review would be covered. Comments received were taken into account before the review was undertaken. The Council is satisfied that the methodology for the review is robust, logical, coherent, and comprehensive to form the basis of the review. The appraisal of individual parcels of land that were carried out and the conclusions and recommendations of the report follow the methodology in a logical and coherent manner. Contrary to concerns expressed by some of the representations that the Green Belt boundary review only considered large land parcels against the purposes of the Green Belt, it indeed also considered specific sites within land parcels where relevant. The methodology for carrying out the Green Belt boundary review makes this point very clear. The Methodology can be accessed by this link: <http://www.woking2027.info/ldfresearch/gbmethod>.

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

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

12.5 The combined information from these assessments provide sufficient basis to make informed judgments about the proposed site allocations in the DPD. It is emphasised that the

Green Belt boundary review report is only one of a number of evidence base studies used to inform the Site Allocations DPD. A detailed list of the evidence base studies is at Appendix 1 of the draft Site Allocations DPD.

12.6 There have been a number of representations objecting to the failure of the Green Belt boundary review to properly consider the historic status of some of the town and villages in the Borough. The Council appreciates and accepts that each of the distinct areas of the Borough have their respective rich histories dating back many years. However, the reference to historic towns amongst the purposes of the Green Belt refers to specifically designated historic towns. In this regard, the approach and context adopted by the Green Belt boundary review is correct.

13.0 Development will lead to significant levels of congestion – there has been no proper assessment of the impacts of the proposed development on roads.

13.1 The Council accepts that the proposed development will generate additional traffic. This has been quantified and can be mitigated. This matter has been comprehensively addressed in Section 9 above. The Council has undertaken a series of transport assessments to inform both the Core Strategy and the Site Allocations DPD. The Core Strategy was informed by a Transport Assessment and a Transport and Accessibility Topic Paper. The Inspector who conducted the Core Strategy examination had this to say on the approach to transport matters adopted by the Council ‘overall, the advocated approach to sustainable transport is the most appropriate strategy within the context of the Borough. The policy provides an adequate strategic framework to be further developed with stakeholders and partners to ensure that the Borough is served by an effective sustainable transport system. There is no substantive evidence to indicate the policy is not robust or capable of effective implementation.

13.2 Since the adoption of the Core Strategy, further studies have been carried to inform the Site Allocations DPD. The Council has carried out a revised Green Belt Boundary Review Sensitivity Test – Strategic Transport Assessment (TA) (2015) to assess the transport implications of the allocated sites. The TA acknowledges that there will be a net but marginal increase in traffic over and above the existing situation, which could be mitigated to enable the delivery of the proposed allocated sites. The mitigation measures will comprise both strategic schemes to be funded by developer contributions and other sources of funding and by site specific measures to be determined as part of detailed Transport Assessments to support planning applications. Specific key requirements have been incorporated in the relevant proposed allocations to make sure that development impacts are fully assessed and appropriate site specific measures are identified to address any adverse impacts.

13.3 The Council has also worked with Surrey County Council to carry out the A320 Corridor Study and the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the networks. A Town centre Modelling Assessment has been undertaken to allow a better understanding of potential traffic impacts in the vicinity of the Town Centre. With appropriate mitigation, the transport impacts of development can be addressed.

13.4 The Council has published a Regulation 123 list of transport schemes that CIL contributions would benefit. It also continues to bid for public sector funding to deliver transport improvements, and an example is £25M investment in transport improvements in the vicinity of the Railway Station which is currently being implemented.

13.5 The Council has worked with the County Council to review its Infrastructure Delivery Plan (2018). It includes up to date information on transport infrastructure and how that will be funded. The County Council as Highway Authority for the area is satisfied that the approach to mitigation taken by the Council will minimise any adverse traffic impacts of the DPD to enable development to be acceptable in transport terms.

14.0 The DPD should allocate more land to meet housing need rather than the Core Strategy requirement. Some specific sites are being promoted.

14.1 The Council has an up to date Core Strategy to set the strategic policy context for the preparation of the Site Allocations DPD. The Core Strategy was adopted in October 2012 and in accordance with paragraph 33 of the NPPF was reviewed in October 2018. The review followed guidance provided in the Planning Practice Guidance. In accordance with Section 6 of the Core Strategy, the Council is committed to the comprehensive delivery of the requirements of the Core Strategy and the preparation of the Site Allocations DPD is a key means to achieving this objective.

14.2 The Site Allocations DPD has a clear purpose set out in the Core Strategy to identify specific sites to enable the delivery of the Core Strategy. Policies CS1 (A spatial strategy for Woking Borough), CS2 (Woking Town Centre), Policy CS6 (Green Belt), Policy CS10 (Housing provision and distribution) and Section 6 (Monitoring and implementation) of the Core Strategy all highlights the role of the Site Allocations DPD to identify sites to enable the delivery of the Core Strategy. Previous Local Development Schemes also highlights the distinct purpose of the Site Allocations DPD. The Site Allocations DPD has been prepared to meet this objective by identifying sufficient land to enable the delivery of the Core Strategy. In accordance with paragraph 139 of the NPPF, the DPD goes further and safeguards land to meet future development needs beyond this plan period to ensure the enduring permanence of the Green Belt boundary.

14.3 The Core Strategy sets out the spatial strategy for the borough, including the broad spatial distribution of development and the timing for the release of Green Belt land. Policy CS1 directs most new development to previously developed land in the town, district and local centres which offers the best access to a range of services and facilities. Land in the Green Belt will only be released to enable housing provision between 2022 and 2027. Policy CS10 specifies the overall quantum of housing units to be accommodated in the Green Belt during the plan period. This is specified as 550 dwellings. The brownfield first approach adopted by the Core Strategy is necessary to ensure sustainable development across the Borough. The Inspector who conducted the Core Strategy Examination had this to say about the spatial strategy of the Core Strategy: 'with due regard to its means of production, the Core Strategy provides the most appropriate spatial strategy for sustainable development within the context of the Borough with clear objectives for the plan period in accord with the aims of national planning policy'. The Core Strategy recognises that Green Belt land will be needed to meet development needs between 2022 and 2027. The Green Belt and the Town Centre are therefore identified as future direction of growth.

14.4 Policies CS1 and CS6 prescribes the means for selecting Green Belt land for future development. These policies require the Council to carry out a Green Belt boundary review to ensure that the land that is released from the Green Belt will not undermine its purposes and integrity. Against this backdrop, any land that is being promoted that is not supported by evidence in the Green Belt boundary review will be resisted. Very special circumstances justification would not exist to allocate or safeguard such land.

14.5 Section 19 of the Planning and Compulsory Purchase Act (2004) and Part 4 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) expects the Site Allocations DPD to take into account the requirements of the Core Strategy.

It is critical that the Site Allocations DPD is prepared in the context of the above requirements. The preparation of the Site Allocations DPD is informed by a number of evidence based studies such as the Green Belt boundary review, which is prescribed by policy and the Strategic Land Availability Study which is prescribed by national policy. All the sites that are either allocated or safeguarded are justified by the available evidence. The Council has also carried out a Sustainability Appraisal of reasonable alternative sites urban and Green Belt sites to demonstrate that the allocated and safeguarded sites are the most sustainable when judged against all the other alternatives.

14.6 Regarding the Green Belt sites, there has been an additional material consideration to be taken into account. As required by paragraph 136 of the NPPF, once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. It is therefore important that very special circumstance justification exists for the sites that are allocated or safeguarded in the DPD. The Council is confident that the sites that are allocated or safeguarded meets this particular test. The same cannot be said for the alternative sites that are being promoted. For any other site to be accepted, a case has to be made to demonstrate that the site being promoted is the most sustainable when compared against the sites that are allocated and safeguarded in the DPD. No credible evidence has been provided so far to convince the Council that the alternatives sites being promoted are better alternatives.

14.7 It would be simplistic and bad planning for the Site Allocations DPD to allocate further land for development to meet Woking's objectively assessed housing need up to 2027. It is highlighted that it is not the purpose of the Site Allocations DPD to determine the housing requirement for the Borough. That is the distinct purpose of the Core Strategy. Paragraph 20 of the NPPF clarifies the role of strategic policies. Strategic policies should set out an overall strategy for the pattern, scale and quality of development and make sufficient provision for housing, infrastructure, community facilities and conservation and enhancement of the natural, built and historic environment. It would be wrong to expect non-strategic policies in the Site Allocations DPD to be performing the role of the Core Strategy by planning for a higher housing requirement.

14.8 The development requirements of the Core Strategy, including the housing requirement have been identified in an integrated manner and justified by a significant body of evidence base studies. These include an Infrastructure Delivery Plan, Employment Land Review and an Employment Topic Paper. The studies have informed the necessary scale and type of infrastructure and economic growth necessary to support and align with the expected quantum of housing growth. To allocate land to meet the objectively assessed need up to 2027 without due regard and a corresponding review of office floorspace, warehouse floorspace, retail floorspace and the necessary infrastructure to align with the revised housing requirement would at best be irresponsible, overly simplistic and ill conceived. It would undermine the overall purpose of the plan-led system to plan in a holistic manner and would also undermine the sustainable development of the Borough, which is the overall aim of national policy.

14.9 The Council's Green Belt boundary review report provides evidence to demonstrate that there is no further scope to release any Green Belt land other than those recommended in the report for strategic development without damaging the overall purpose and integrity of the Green Belt. This point is highlighted in paragraph 3.5.22 of the Green Belt boundary review

report. It states 'we do not consider any other parcels to be suitable for removal from the Green Belt to accommodate new strategic development'. Any additional sites being promoted in the Green Belt submitted during consultation have not been identified by the Green Belt boundary review report. Their allocation or safeguarding will be damaging to the purposes of the Green Belt. Very special circumstances justification would therefore not exist to allocate these sites.

14.10 There are some representations seeking to remove the time restrictions for releasing Green Belt land for development. To do so will be at odds with the spatial strategy for the Core Strategy. The timing for the release of Green Belt land is prescribed by Policies CS1 and CS6 of the Core Strategy. They require land to be released from the Green Belt to meet housing need between 2022 and 2027. This is necessary to ensure that most new development is focused on previously development land in the urban area which offers the best access to a range of services and facilities, in line with the objective of sustainable development. Policy SA1 of the Site Allocations DPD is drafted to be in general conformity with this objective. The Site Allocations DPD clearly demonstrates that sufficient land has been identified on previously developed land in the urban area to meet development needs up to 2022. The request to remove the time restrictions on the release of Green Belt land is therefore not justified and unacceptable.

14.11 It is acknowledged that the Green Belt boundary review report has recommended that the following sites as were identified in the Regulation version of the DPD could be released from the Green Belt to meet future development needs of the Borough:

- Land to the north east of Saunders Lane, Mayford (GB10);
- Land to the north west of Saunders Lane, Mayford (GB11);
- Land rear of 79 – 95 Lovelace Drive, Teggs Lane, Pyrford (GB12); and
- Land east of Upshot Land and south of Aviary Road, Pyrford (GB13).

14.12 The sites were identified in the draft Site Allocations DPD to be safeguarded to meet future development needs beyond the plan period between 2027 and 2040. This was published for Regulation 18 consultation between June and July 2015. The Council has considered the representations received during this consultation and has also reviewed all the available evidence and the policy context for safeguarding the sites, and has come to the conclusion that very special circumstances justification does not exist to safeguard the sites for the following reasons:

- All the sites would give rise to a certain level of harm to the sustainability objectives of the Sustainability Framework used for the Sustainability appraisal. In particular, it is noted that GB9, 10 and GB13 are all within the designated "Escarpment of Rising Ground of Landscape Importance" which policy CS24 Core Strategy specifically identifies as a "key landscape" to be "conserved" and where possible "enhanced". Furthermore, whilst GB12 is not within the Escarpment designation, it is adjacent to the Escarpment and forms part of an important rural landscape setting to the southerly boundary with the urban area of Woking it is consider to also be protected by policy CS24. Moreover, GB12 together with GB13 form part of the setting of the Registered Park and Garden at Pyrford Court and the Aviary Road Conservation Area (both designated heritage assets). In their present open and rural form these sites make an important contribution towards the respective heritage significance of those designated

heritage assets. Paragraph 193 NPPF requires “great weight” to be attached to the conservation of designated heritage assets. The Council is therefore of the view that exceptional circumstances do not exist so as to justify the release of proposal sites GB 10, 11 and 12 from the Green Belt because the use of those sites for residential development would: (i) conflict with policy CS24 Core Strategy and thus not be in accordance with the development plan’s strategy for sustainable development contrary paragraph 139(a) of the NPPF, (ii) fail to protect or enhance a valued landscape in accordance with paragraph 170(a) of the NPPF, (iii) in the case of GB12 GB13, fail to conserve designated heritage assets and (iii), result in the permanent loss of Green Belt land assessed within the Green Belt Review as performing variously a “critical” and “major” role to check urban sprawl and a “critical” and “major” role towards safeguarding the countryside from encroachment Moreover, contrary to Policy CS6 of the Core Strategy, it is considered that the development of GB10, 11 and 12 and GB13 would individually and certainly collectively, critically undermine the overall purpose and integrity of the Woking Green Belt.

- 14.13 The decision to determine whether very special circumstances justification exist to safeguard the sites is a matter of planning judgment. It is clear from the above reasons that the decision of the Council is well informed by the careful consideration of all the available evidence and defensible.

Other representations

The following issues attracted a significant number of representations, many of which are site or locally related, but may not necessarily be of a strategic nature.

15.0 Part of safeguarded site GB5 (Land to the south of Rectory Lane, Byfleet) is owned by the Church, and is consecrated as future burial land.

15.1 The Council has not sought to prepare key requirements for safeguarded sites as it has with allocated sites. These will be prepared and agreed as part of the review of the Core Strategy and/or the Site Allocations DPD, and will be informed by up to date evidence and policies at the time. The Council is aware of the matters raised by the representations and will be taking them into account when it defines the key requirements for the site. The anticipated capacity of the site as set out in Appendix 4 of the Site Allocations DPD takes account of the ownership issues raised by the representations. At this stage it is not envisaged that the ownership issues would preclude the entire site coming forward to meet future development needs.

16.0 The DPD – specifically the allocation of West Hall (site allocation reference GB10) and, to a lesser extent, West Byfleet Junior and Infant School Playing Fields (GB18) – conflicts with the objectives and policies of the West Byfleet Neighbourhood Plan.

16.1 The Core Strategy clearly specifies that Green Belt will need to be released to deliver the development aspirations and requirements of the Council. West Hall has been identified in the context of this broad strategic framework, taking account of a breadth of evidence that is robust and comprehensive. This evidence justifies the allocation of this site, and others put forward in the DPD. As stated in the NPPF, Neighbourhood Plans should support and be in conformity with the delivery of strategic policies contained in local plans or other spatial development strategies.

17.0 The allocation of West Hall (GB10) does not take account of and/or is in conflict with the safeguarding of the site by Surrey County Council's Minerals Plan.

17.1 The designation of mineral safeguarded areas is not an absolute constraint to development. Surrey County Council, the Minerals Planning Authority, have been consulted in the plan preparation process and have not raised an objection to the site's allocation on the grounds of the minerals allocation.

18.0 The density of development on allocated sites in urban areas should be maximised in order to reduce the need to release Green Belt land.

18.1 The Council takes the view that the proposed anticipated densities are reasonable and are broadly in line with the Core Strategy. It is always emphasised that the proposed densities are indicative, based on ranges provided in policy CS10 of the Core Strategy (which are in turn based on the character of the area and on exemplar sites) and actual densities can only be agreed on a case by case basis depending on the merits of each proposal at the planning application stage. Densities could go up or down depending on the nature of the scheme, and this will be managed at pre-application / planning application stage. Paragraph 1.7 above reiterates the need to allocate a range of sites to meet the variety of housing need across the

Borough. Green Belt sites will contribute towards the provision of family homes that could not be met by high density flatted development.

19.0 Development will have a detrimental impact on local habitats, including fields and woodland, and their wildlife.

19.1 During the preparation of the Site Allocations DPD the Council consulted with Surrey Wildlife Trust and Natural England to discover the biodiversity value of each of the proposed sites. Overall, Surrey Wildlife Trust and Natural England did not raise any objection to the proposed allocations based on biodiversity issues that could not be addressed. Nevertheless a number of the proposed allocations will require a detailed ecological and/or tree survey as a key requirement to assess any site specific ecological issues. The surveys will make sure that trees and other features of environmental, ecological and amenity significance are fully assessed and protected from development, where necessary. Furthermore, development will have to comply with the requirements of policy CS7 and CS8 of the Core Strategy. These policies seek to protect and enhance the biodiversity assets of the Borough.

19.2 The Council is committed to conserving and protecting existing biodiversity assets within the Borough. Outside of designated important sites and habitats, the Council will encourage new development to make positive contribution to biodiversity through the creation of green spaces and the creation of linkages between sites to create a biodiversity network of wildlife corridors and green infrastructure. This is clearly set out in Core Strategy Policy CS7: *Biodiversity and nature conservation*, and reinforced by Development Management Policies DPD Policy DM1: *Green infrastructure*. In addition to this the Council will consult with the relevant biodiversity organisations including Surrey Wildlife Trust and Natural England during the detailed planning application stage as well as require applicants to carry out prior assessments of the site to provide information on species and habitats, as set out in the site specific Key Requirements. This will ensure the effective avoidance and or mitigation of any adverse effects prior to approval of the development.

19.3 If at planning application stage any trees/woodland of value are identified and should be retained, then policies in the Development Plan will ensure any development proposal takes this into account. Examples of such policies include policy CS7 of the Core Strategy mentioned above, and also Development Management Policies DPD Policy DM2: *Trees and landscaping*, as well as the Key Requirements of the site allocation policy.

20.0 Green Belt land in Mayford is fundamental to the physical separation of Woking, Mayford and Guildford; and preserves the strong historical character of Mayford. This should be recognised.

20.1 The Green Belt boundary review assessed parcels of land against the purposes of the Green Belt, one of which is preventing neighbouring towns from merging into one another. Sites GB7, GB8 and GB9 are all in parcel 20 of the Green Belt boundary review. The review concluded that development in this parcel would not reduce the gap between the town and the northern edge of Guildford. Furthermore, the northern part of site allocation GB7 (Nursery Land adjacent to Egley Road) has been designated as an area of local separation to provide a visual gap between Mayford and the rest of the urban area, in order to strengthen the visual separation between Mayford and the rest of Woking.

20.2 The specific purpose of the Green Belt to preserve the setting and special character of historic towns was not considered relevant in the Green Belt boundary review because by definition Woking and its villages are not classified as historic towns. It is acknowledged that Woking has a variety of heritage assets and a rich history dating back many years, and there are sufficient and robust policies to preserve and/or enhance these assets. It is not envisaged that the integrity of any of these assets will be compromised by the proposed allocations.

20.3 It is acknowledged that residents of Mayford wish to preserve the identity and character of the village. The special character of Mayford is recognised by the Council and Core Strategy Policy CS6: *Green Belt* specifically highlights that development will not be allowed if it is considered to have an unacceptable effect on the primarily residential character of the village and Green Belt.

21.0 Development of Green Belt land will lead to urban sprawl.

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

22.0 The Council should use empty offices / commercial buildings in industrial estates for development instead of using Green Belt land.

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

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

23.1 It is not envisaged that the DPD will have significant adverse impacts on the heritage assets of the area. This is confirmed by the evidence in the SA Report. The Core Strategy (Policy SC20) and the Development Management Policies DPD (Policy DM20) has robust policies to conserve the heritage assets of the area as a result of development impacts. Historic England has also confirmed that they are satisfied that the relationship of the Site Allocations DPD to the policies of the Woking Core Strategy will ensure that development takes place in a sustainable form that reflects the requirements of the NPPF, and by definition, this includes the objective to conserve heritage assets in a manner appropriate to their significance.

24.0 The make-up of the LDF Working Group is unrepresentative. The Councillors are biased towards certain areas. There was also a lack of due process prior to and during the Council meeting in October 2018.

24.1 The Council has a laid down procedure for selecting Members to serve on Working Groups. This has been followed in selecting the cross-party Membership of the Local Development Framework Working Group to scrutinise the plan-making process and make recommendations to the Executive / Council. As an advisory Group, the Working Group appropriately carried out its duties by making recommendations to Council for the October 2018 meeting. The Group gave clear and specific reasons for its recommendations. The Council took them into account before coming to its decision to proceed to Regulation 19 consultation. The correct process has been followed at every stage of the Site Allocations DPD process.

24.1 The Council also has an Overview and Scrutiny Committee, which can recall matters for further scrutiny if deemed necessary. At full Council, all Members are involved in the discussions, making sure that the wider interests of all Councillors representing a range of community interests are taken into account.

24.2 Where necessary, in between these meetings there have been private Members briefings to ensure Members are clear on the reports, and decisions that they will be asked to make. In this regard, all aspects of the political workings of the Council have been engaged in preparing the DPD.