



**WOKING LOCAL DEVELOPMENT FRAMEWORK  
CORE STRATEGY DEVELOPMENT PLAN DOCUMENT  
SOUNDNESS SELF ASSESSEMNT**

**October 2006**

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## Core Strategy DPD – Soundness self-assessment

Test	Assessment
<b>Procedural Tests</b>	
<b>i) The DPD has been prepared in accordance with the Local Development Scheme (LDS)</b>	
<ul style="list-style-type: none"> <li>○ Is the DPD in the authority's LDS</li> </ul>	<b>Yes.</b>
<i>Action Required</i>	None
<ul style="list-style-type: none"> <li>○ Have the details set out in the LDS such as the role, rationale and scope of the DPD been met.</li> </ul>	<p><b>Yes.</b></p> <p>The core strategy generally performs the function set out in the "Role and Subject" set out in the LDS.</p> <p>Two minor issues need to be addressed.</p> <ol style="list-style-type: none"> <li>1. The end date for the Core Strategy set out in the LDS is 2017. The adoption date is now December 2007. To provide ten years housing land supply on a financial year basis requires an end date of 31 March 2018.</li> <li>2. The key diagram does not show the relationship to other local authority areas.</li> </ol>
<i>Action Required</i>	<ol style="list-style-type: none"> <li>1. Amend LDS as part of 2006 AMR to give end date of 2018.</li> <li>2. Amend key diagram to show other local authority areas</li> </ol>
<b>ii) The DPD has been prepared in compliance with the Statement of Community Involvement (SCI) or with minimum requirements set out in the regulations where no SCI exists</b>	<b>Yes it has.</b> However the Statement of Consultation needs to demonstrate how the regulations have been followed. Because the SCI has not been adopted there is no statutory requirement to show how we have followed it, but it would be a good idea to also show this.
<i>Action required</i>	Add to Statement of Consultation description of how regulations and draft SCI have been followed
<b>iii) The Plan and its policies have been subject to a Sustainability Appraisal</b>	<b>Yes.</b>
<i>Action required</i>	None.
<b>Conformity Tests</b>	
<b>iv) It is a spatial plan which is consistent with national planning policy and in general conformity with the RSS for the region, and has properly had regard to any other relevant plans policies and strategies relating to the area or to adjoining</b>	

Test areas.	Assessment
<ul style="list-style-type: none"> <li>○ It is a spatial plan which has regard to other plans, policies and strategies</li> </ul>	
<p>Does the DPD reflect the guidance on spatial planning which is set out in national planning policy in PPS1 – paras 30-32, and PPS12 paras 1.8 to 1.11</p> <p>Requirements in PPS1 para 32 are as follows:</p> <p>In preparing spatial plans, planning authorities should:</p> <p>(i) Set a clear vision for the future pattern of development, with clear objectives for achieving that vision and strategies for delivery and implementation. Planning should lead and focus on outcomes. Plan policies must be set out clearly, with indicators against which progress can be measured. Plans should guide patterns of development and seek to manage changes to the areas they cover.</p> <p>(ii) Consider the needs and problems of the communities in their areas and how they interact, and relate them to the use and development of land. They should deal not only with what can be built where and in what circumstances, but should set out also how social, economic and environmental objectives will be achieved through plan policies.</p> <p>(iii) Seek to integrate the wide range of activities relating to development and regeneration. Plans should take full account of other relevant strategies and programmes and, where possible, be drawn up in collaboration with those responsible for them. The aim should be to co-ordinate urban and rural regeneration strategies, regional</p>	<p>A Spatial Vision and Key Objectives are set out in a Spatial Approach section. Key delivery mechanisms for each objective, both through the LDF and other strategies and delivery mechanisms are highlighted, and described in the text.</p> <p>Policies to deliver the plan through Development Control are set out. All these policies are to be material planning considerations. A clear outcome based target and indicator is provided for each policy, focussing where possible on the expected level of change or development planned for.</p> <p>The Objectives set out in the Spatial Approach section cover a range of key Social, Economic and Environmental issues and identify how these can best be addressed. This includes both development control and other delivery mechanisms.</p> <p>The policies themselves then set out how these can specifically be addressed through the Development Control process.</p> <p>Key relevant strategies are listed where appropriate as key delivery mechanisms under the relevant objective and described in the text. These show where implementation will be not entirely through development control.</p> <p>The LDF is closely aligned to the LTP</p>

Test	Assessment
<p>economic and housing strategies, community development and local transport plans with development plans. Planning authorities should consult closely with the bodies responsible for those strategies to ensure a coherent and consistent approach. ... Local development documents should take forward those elements of the local community strategies that relate to the physical development and use of land in an authority's area.</p>	<p>and Woking Parking Management Plan in terms of actions and targets. The LDF is closely aligned to the Woking Climate Change Strategy, Housing Strategy, Cultural Strategy Green Spaces Development Plan, Social Inclusion &amp; Community Cohesion Strategy and to the Surrey Biodiversity Action Plan in terms of actions and targets.</p> <p>A range of service delivery strategies are addressed through the infrastructure needs research.</p> <p>Key components of the Community Strategy have driven the LDF Core Strategy.</p> <p>Spatial provisions of Minerals and Waste LDFs will be shown on the proposals map will be taken into account once those Plans are adopted.</p> <p>Section 8 of the Core Strategy sets this out. The detail is in Appendix 6 of the Sustainability Appraisal.</p>
<p><i>Action Required</i></p>	<ol style="list-style-type: none"> <li>1. Check that the role of all listed delivery mechanisms is clearly described in the Spatial Approach section, and amend text if necessary.</li> <li>2. Add wording making clear that all policies are intended to be material planning considerations, and that the extent to which objectives will be achieved by other means is set out in the Spatial Approach section.</li> </ol>
<ul style="list-style-type: none"> <li>o Has adequate account been taken of the relationship between the proposals in the DPD and other requirements, such as those of utility companies and agencies providing services in the area including their future plans or strategy and any requirements for land and premises, which should be prepared in parallel?</li> </ul>	<p><b>Yes</b> - Addressed through Woking LSP Common Understanding of Needs project – leading to the published Social and Community Infrastructure Requirements Study. An update is currently being produced. Maintaining this work up to date is a LSP key target.</p> <p>The issue of water utilities is still being addressed. This will be resolved prior to submission.</p>
<p><i>Action required</i></p>	<ol style="list-style-type: none"> <li>1. Complete update of Social and Community requirements Study</li> <li>2. Complete work on water utilities requirements</li> </ol>
<ul style="list-style-type: none"> <li>o Is it clear how the DPD relates to</li> </ul>	<p><b>Yes</b> - Transport Objective and Policy</p>

<b>Test</b>	<b>Assessment</b>
other plans and strategies such as local transport plans which will influence the delivery of policies and proposals within the Plan	TRA1 describe proposals in LTP and how these will help deliver the strategy. Indicators and targets for TRA 1 are the same as those in LTP.
<i>Action Required</i>	None.
<ul style="list-style-type: none"> <li>o In two tier areas, does the DPD integrate effectively with plans prepared by the County Council / District Council?</li> </ul>	Minerals and Waste Plans are not yet adopted. Introduction states that the proposals map will show the relevant sites once it has been adopted. Specific policies e.g. on recycled building materials are included.
<i>Action Required</i>	None.
<ul style="list-style-type: none"> <li>o Have any representations from bodies which consider that the Core Strategy does not pay sufficient regard to their strategies been properly addressed.</li> </ul>	<i>Awaiting response to proposed changes from remaining core consultees.</i>
<i>Action Required</i>	Address County Council response seeking additional reference to (traffic) demand management. Any other actions not yet known.
b) It is consistent with national planning policy	
<ul style="list-style-type: none"> <li>o Does the DPD contain any policies or proposals which are not consistent with national planning policy. If so is there a local justification.</li> </ul>	Only outstanding issue from GOSE is the gypsy and traveller sites policy (H6). This requires further consideration.
<i>Action Required</i>	Reconsider wording of Policy H6
c) The Plan is in general conformity with South East Plan.	<i>Awaiting response to proposed changes from SEERA.</i> Test is whether the Core Strategy would “cause significant harm” to the implementation of the South East Plan.
<i>Action required</i>	Not yet known.
<b>v) It has had regard to the authority’s community strategy</b>	
<ul style="list-style-type: none"> <li>o Does the DPD have regard to the community strategy, by setting out policies and proposals which deliver key components of that strategy so far as they are consistent with or in general conformity with higher-level planning policy and relate to the use and development of land.</li> </ul>	<b>Yes</b> – but this could be clearer. A schedule setting out how each theme and sub theme of the community strategy will be addressed by Objectives and Policies would be worthwhile.
<i>Action required</i>	Add specific schedule indicating how each relevant theme and sub theme of the Community Strategy will be addressed by the spatial approach, and refer to in text as appropriate.
<b>Coherence, Consistency and Effectiveness</b>	
<b>vi) The strategies /policies /</b>	

Test	Assessment
<p><b>allocations in the Plan are coherent and consistent within and between Development Plan documents prepared by the authority and by neighbouring authorities, where cross boundary issues are relevant.</b></p>	
<ul style="list-style-type: none"> <li>○ Do the policies clearly relate to the objectives in the Core Strategy</li> </ul>	<p><b>Yes</b> - Relevant policies are listed under each objective in the Spatial Approach section.</p>
<p><i>Action Required</i></p>	<p>None</p>
<ul style="list-style-type: none"> <li>○ Are the policy objectives within the DPD themselves consistent.</li> </ul>	<p><b>Yes</b> - The main area of representation on the preferred option was that the transport strategy did not adequately back up the spatial strategy. This has been addressed in the submission plan and Surrey CC is now satisfied with this element.</p>
<p><i>Action Required</i></p>	<p>None</p>
<ul style="list-style-type: none"> <li>○ Is it clear how the DPD relates to the LDF and to other relevant plans prepared by neighbouring authorities.</li> </ul>	<p><b>Yes</b> – Where an objective or policy will be delivered in part by another LDD this is set out in the text. There are no specific links to the plans of neighbours. However no objections have been received identifying any omissions in this respect.</p>
<p><i>Action Required</i></p>	<p>None</p>
<ul style="list-style-type: none"> <li>○ Where there are overlaps, are these consistent / complementary</li> </ul>	<p>I am not aware of any overlaps.</p>
<p><i>Action Required</i></p>	<p>None</p>
<ul style="list-style-type: none"> <li>○ Are there any obvious gaps in the coverage of the DPD having regard to its purpose and the relevant requirements set out in national planning policy statements</li> </ul>	<p>Gaps identified by respondents at preferred option stage have been addressed. Only outstanding issue for GOSE is gypsy sites <b>which we should address as set out above.</b></p>
<p><i>Action Required</i></p>	<p>None</p>
<ul style="list-style-type: none"> <li>○ Is it clear how any cross-boundary issues are addressed</li> </ul>	<p>The Core Strategy deals with cross boundary issues by being in conformity with SE Plan. There are no other obvious cross boundary issues which are directly addressed.</p>
<p><i>Action Required</i></p>	<p>None</p>
<ul style="list-style-type: none"> <li>○ Proposals Map is not subject to examination in its own right. Therefore any changes to the proposals map should be explained and justified in their own right in the DPD (Lichfield Inspectors report para 2.39)</li> </ul>	<p><b>Not currently covered.</b> This needs to be set out in the relevant policies or spatial approach.</p> <p><i>Plus there is the issue of whether we submit a whole new proposals map or only the changes to the adopted Local plan Proposals Map. PPS12 is not very clear on this point. Para 4.14 &amp; 5.17 suggests only the changes. We need some advice.</i></p>

Test	Assessment
<i>Action Required</i>	Seek advice from GOSE about required form of submitted proposals map.
<p><b>vii) The strategies/policies/allocations represent the most appropriate in all the circumstances, having considered the relevant alternatives, and they are founded on a robust and credible evidence base.</b></p>	
<ul style="list-style-type: none"> <li>o Is it clear that the Local Planning Authority considered all reasonable options and alternatives in preparing the DPD</li> </ul>	<p>The Issues and Options report set out 4 clear strategic options for the future spatial development of the Borough. These set out different ways to deliver a spatial vision and key objectives which had been developed through an earlier round of public consultation.</p> <p>The options included all reasonable options for development in the urban area. They explicitly did not include options involving Green Belt release. This was reasonable as there was no strategic justification given the approach in the emerging South East Plan, evidence of capacity in the Urban Area, and the fact that the earlier visioning exercise found no public support for changes to the Green Belt boundary.</p> <p>The strategic options at issues and options stage did not include the detailed policies. These were developed to deliver the preferred option once this had been selected. This enabled the Issues and Options consultation to focus on the strategic spatial issues.</p> <p>The preferred option sets out a clear and specific preferred option for the future spatial development of the Borough, and has been chosen with reference to the evidence base, public consultation, and the content of national, regional and local policy and guidance.</p> <p>Section 8 of the Preferred Option document should be set out more explicitly by explaining the role of research, consultation, Government guidance and sustainability appraisal in selecting the preferred option and rejecting the others (Stafford Inspectors report Para 3.2.5 refers to the need for this)</p>

Test	Assessment
	<p>Where objectors have proposed something from a rejected option this should be clearly identified in our response.</p> <p>The sustainability appraisal tests the options against sustainability objectives. The SA does not score the options, but seeks ways to integrate sometimes complex objectives and achieve them together. It therefore provides a thorough audit trail of how sustainability considerations have been taken into account in choosing the preferred option.</p> <p>The public consultation on issues and options has tested the options against public opinion.</p>
<i>Actions required</i>	<ol style="list-style-type: none"> <li>1. Redraft Section 8 of Core Strategy preferred option document to be clearer about the selection and rejection of options.</li> <li>2. Add back in the references to preferred and rejected options in Spatial Approach section</li> <li>3. Include in schedule of responses where a respondent at preferred option stage has proposed a previously rejected option.</li> <li>4. Seek advice from GOSE that they remain satisfied that carrying out issues and options consultation on Spatial Approach alone, and not the policies themselves, was a sound approach.</li> </ol>
<ul style="list-style-type: none"> <li>○ Are the assumptions in the DPD set out clearly and are they supported by evidence</li> </ul>	<p>Evidence Base for each objective is set out in Spatial Approach. This states clearly the assumptions which are derived from the evidence base.</p> <p>The evidence base comprises the following key documents:</p> <p>DCLG Statistical release 2006/0042: 2003-based household projections to 2026.</p> <p>Surrey County Council 2001- based population forecasts.</p> <p>Housing Potential Study. <i>(Currently being updated)</i></p>

Test	Assessment
	<p>Housing Need Assessment – as required under existing guidance. <i>(nb a sub regional housing market assessment is in preparation in accordance with the proposed approach in draft PPS3. This will be available spring 2007).</i></p> <p>Gypsy and Traveller Accommodation Needs Assessment <i>(in preparation – available before submission)</i></p> <p>Employment Needs Assessment and Commentary on Employment Land – as set out in Government Guidance</p> <p>Surrey Hotel Futures – looking at future demand in the hotel sector.</p> <p>Retail and Commercial Leisure Study – a study of demand, expenditure capacity and potential as set out in PPS6.</p> <p>Guildford and Woking Integrated Transport Study – which informs the South East Plan (London Fringe sub regional strategy), Surrey Local Transport Plan and the Core Strategy.</p> <p>Social and Community Infrastructure Needs Study – produced jointly with the Woking LSP and taking account of the delivery plans of all relevant service providers including health and education.</p> <p>Open space sports and recreation facilities audit – as required by PPG17.</p> <p>Strategic Flood Risk Assessment – as required by draft PPS25 <i>(results awaited).</i></p> <p>Appropriate Assessment of the impact of the Core Strategy on the SPA and SAC designations. <i>(results awaited)</i></p> <p>Carbon Emissions Reduction Research – research into costs to inform the climate change policy <i>(just received)</i></p>
<i>Action required</i>	<p>1. Include Housing Trajectory in justification to Policy H1. Although PPS12 states that this is a matter for the Housing Allocations DPD, both the Lichfield and Stafford Inspectors have</p>

Test	Assessment
	<p>concluded that it should be in the core strategy. (nb this must include an assumption about losses arising from H5)</p> <p>2. Identify in the text that some forecasts in the evidence base run to 2016, as this was the original end date intended for the Core Strategy when the evidence was commissioned, rather than the new end date of 2018. This particularly affects GWITS, the Retail and Commercial Leisure Study and Employment Needs Assessment. Where this is the case an assumption is made that any additional need /potential in the 2016-2018 period can be addressed at review stage. The key requirement for a 10 year supply of housing land is, however, addressed fully.</p> <p>3. Confirm with GOSE that they are satisfied that the absence of the sub-regional evidence base for housing proposed in draft PPS3 – Sub regional Housing Market Assessment and Sub Regional Housing Land Availability Study will not result in the Core Strategy being fundamentally unsound.</p> <p>4. Assess cost implications findings from Carbon Emissions research and identify an approach which delivers best practice without hampering the delivery of other planning obligation requirements or rendering development non-viable.</p>
<ul style="list-style-type: none"> <li>○ Is it “most appropriate in all the circumstances”? Stafford Inspector makes much of the requirement for the Core Strategy to reflect “local distinctiveness” – and not just to restate national guidance.</li> </ul>	<p>Each objective in the spatial approach section sets out a specific spatial approach for the Borough. Broad quantum and/or densities of development in different locations in the Borough are set out, and it is clear to what extent this will meet needs identified in the evidence base. This provides a locally distinctive spatial approach, which is then translated into the specific policies.</p>
<p><i>Action required</i></p>	<p>1. Obtain view from GOSE as to where they feel policies merely restate national guidance (They have cited Green belt policy as an example)</p>
<ul style="list-style-type: none"> <li>○ Plan monitor manage – Lichfield Inspector recommends need for a phasing policy to prevent housing development “racing ahead.”</li> </ul>	<p>The Core Strategy expressly explains why it does not include a phasing policy, and is not seeking to prevent “over provision” of housing in the urban area compared to South East Plan. This is because of the level of housing demand /</p>

Test	Assessment
	<p>need in the area and the lack of overriding infrastructure constraints. Surrey County Council appears to have climbed down on the need for such a policy, and SEERA haven't asked for one. In addition there is the strategic policy on phasing in the context of major infrastructure provision in the South East Plan.</p>
<i>Action required</i>	1. Obtain view from GOSE as to whether they are satisfied that this approach is sound.
<b>viii) There are clear mechanisms for implementation and monitoring</b>	
<ul style="list-style-type: none"> <li>o Does the DPD contain targets and milestones which relate to the delivery of the policies (including housing trajectories where the DPD contains housing allocations)</li> </ul>	<p><b>Yes</b> – each policy has an indicator (wherever appropriate this is a Core Output Indicator recommended by Government) and a target.</p> <p>As well as monitoring the effectiveness of the policies, the indicators and targets will be used to measure the achievement of the overall objectives, as the spatial approach makes clear which policies will contribute to delivering each objective.</p> <p>A housing trajectory is included based on the housing potential study, but it is not site specific. This will be refined for the Site Allocations DPD.</p>
<i>Action required</i>	Add to spatial approach section this description of how achievement of the overall objectives will be measured.
<ul style="list-style-type: none"> <li>o Is it clear how these are to be measured and are these linked to the production of the AMR</li> </ul>	<b>Yes.</b> Para 4.6c states that all indicators and targets will be reported in the AMR.
<i>Action required</i>	None.
<ul style="list-style-type: none"> <li>o Are the delivery mechanisms and timescale for implementation of the policies clearly identified?</li> </ul>	<p>Delivery mechanisms are set out for each objective in the spatial approach. The policies themselves are all to be delivered through the DC process, and are part of the delivery of the Spatial Approach.</p> <p>As a result no delivery mechanisms are set out for individual policies.</p> <p>This is considered to be a logical way of producing a spatial plan.</p>
<i>Action required</i>	Check with GOSE that they consider this a sound approach.
<ul style="list-style-type: none"> <li>o Is it clear who will implement each policy? Where the actions</li> </ul>	Again this is set out for the objectives and spatial approach, rather than the

Test	Assessment
<p>required to implement each policy are outside the direct control of the LPA is there evidence that there is the necessary commitment from the relevant organisation to implementation of the policies</p>	<p>policies themselves.</p> <p>Evidence of commitment from other organisations is given in the relevant strategies of that organisation, listed in the spatial approach.</p>
<i>Action required</i>	As above.
<ul style="list-style-type: none"> <li>○ Do the processes for measuring the success of the DPD accord with national guidance</li> </ul>	<p><b>Yes.</b> Core Output Indicators have been used as the basis for targets wherever possible.</p>
<i>Action required</i>	None
<ul style="list-style-type: none"> <li>○ Does the DPD explain how its key policy objectives will be achieved</li> </ul>	<p><b>Yes .</b> This is set out in the text of the spatial approach.</p>
<i>Action required</i>	None
<b>ix) Is it reasonably flexible to enable it to deal with changing circumstances</b>	
<ul style="list-style-type: none"> <li>○ Is the DPD flexible enough to respond to a variety of, or unexpected changes in, circumstances</li> </ul>	<p>A qualitative risk assessment has been produced for the Core Strategy. This was reported to the Executive in approving the preferred Option. This identifies the main risks to delivering the preferred option, and how the preferred option has minimised the risk.</p> <p>On housing numbers the Core Strategy specifically identifies the broad location of safeguarded long term development land. This will provide a contingency against under provision of housing against South East Plan provision.</p> <p>However, if objections to the submitted RSS prevail to the extent that fundamental changes are made to housing numbers then there may be insufficient flexibility to meet this change. It is impractical to deliver this if and until any changes to the submitted South East Plan are known</p>
<i>Action required</i>	<ol style="list-style-type: none"> <li>1. Include risk assessment as background document</li> <li>2. Obtain view from GOSE as to whether the risk assessment adequately demonstrates that the Core Strategy is robust enough to deal with likely risks.</li> </ol>
<ul style="list-style-type: none"> <li>○ Are Development Control policies written in a generic form to enable them to provide a robust and consistent framework for considering planning applications</li> </ul>	<p><b>Yes.</b> Core Strategy contains a suite of generic DC policies.</p>

Test	Assessment
Action required	None.

### **Core Strategy - Risk Management**

1.1 The Preferred Option is recommended as the best and most sustainable way of meeting the complex range of needs and aspirations which the Council has to address. However, it is not free of risk. The following are the key risks which affect the preferred option.

1. No / few improvements may be made to the transport network

1.2 Risk: There is considerable uncertainty over the transport strategy, the level of investment, and the impact which transport network improvements, and other measures could have.

1.3 Method of minimising risk: The strategy focuses development in the most sustainable locations where are the greatest opportunities to not use a car. In these areas parking will be restricted. A transport impact tariff will be sought to contribute to network improvement. Woking is a regional and county priority for investment through being a designated hub, which maximises the chance of investment being made in the network.

2. Rate of Development could exceed South East Plan provision

1.4 Risk: There is uncertainty over the rate at which development will take place. The housing potential study shows enough potential to meet the SE Plan requirements, but other sites could well come forward in a buoyant market, particularly in and around the town centre, which would result in the figure being exceeded. Government Guidance does not permit local authorities to set arbitrary ceilings on otherwise acceptable development, and there are no overriding infrastructure deficits which would justify a phasing policy.

1.5 Method of minimising risk: As far as can be seen ahead social and community infrastructure will cope with a forecast population rise of 3-5%. A tariff system will be applied to provide a pool of contributions to fund local improvements which may become needed to meet the demands of the new population.

3. Rate of development could be below South East Plan provision

1.6 Risk: The contrary risk is that development is below the South East Plan provision. This could happen if the apartment market does not remain buoyant, as many town centre sites would not be economically viable to develop for houses with gardens.

1.7 Method of minimising risk: Should this happen, the safeguarded long term development sites could be used to bring the provision up to the South East Plan level. In practice the safeguarded sites are more likely to be released for affordable housing, as this is a higher risk, as set out below.

4. Insufficient affordable housing may be provided to meet housing need

- 1.8 Risk: There is a high risk that the amount of affordable housing provided will be below identified need, and a significant risk that it will be below the level sought in the Woking Housing Strategy.
- 1.9 Method of minimising risk: The Council is using investment opportunities such as Woking Homes and the Private Finance Initiative to address this issue. In addition the Core Strategy provides for the safeguarded long-term development sites to be released for affordable housing if required to meet housing need.

5. Pace of change in the Walton Road area could impact on social cohesion

- 1.10 Risk: Of the three areas around the town centre identified for high density housing, the Walton Road area is different from the other two, in that it is an area with high levels of deprivation and is also the centre of the Borough's Asian community. Major redevelopment would have the benefit of creating a more diverse community, but could impact on the community by providing apartments in place of some existing large and relatively affordable houses, whereas the local need is for large family homes.
- 1.11 Method of minimising risk: This issue will be kept under review. Higher density housing has been permitted in the Walton Road area in recent years and this has not to date resulted in the loss of significant numbers of family homes. If this position starts to change a revision to the Core Strategy may be required.

6. Mix of market housing may not meet local needs

- 1.12 Risk: The core strategy does not seek to exercise detailed control over the mix of dwelling sizes of market housing except on the largest sites. In these cases a mix is required principally to create balanced communities, rather than to meet identified needs. The assumption is that developers will provide what people want to buy, and this will therefore meet the needs of those who can afford to buy on the open market. This is expected to result in a preponderance of smaller units in the areas suitable for higher density development close to Woking town centre, with more large units elsewhere. However an alternative assessment would be that a lack of control over mix will result in housing which favours people moving out of London, who may have more disposable income, rather than local people.
- 1.13 Method of minimising risk: No specific measures are put in place by the Core Strategy to minimise this risk. However the Council has commissioned a sub-regional housing market assessment, jointly with Guildford and Waverley, which will address this, amongst other issues. Dependent on the conclusions of the assessment this could lead to the inclusion of more prescriptive policies on housing mix for individual sites in the Site Allocations DPD.

7. Rate of commercial development may be below expectations

- 1.14 Risk: The preferred option provides for business and retail development largely in Woking Town Centre, and with more restrictive parking standards than in the past. This is being introduced following several years of little commercial development in the Borough. If the town centre location does not prove attractive to developers on these terms then economic growth in the Borough will be well below expectations.

- 1.15 Method of minimising risk: This approach is in line with the South East Plan, and relies on other Boroughs also following the Plan to avoid perverse incentives to locate in less sustainable locations. The parking standard chosen will reflect the South East Plan range but will not be overly restrictive.

*8. Impact of environmental constraints may be higher than expected*

- 1.16 Risk: The impact of some environmental constraints remains unclear. This applies in particular to the impact of the designation of, Sheets Heath, Brookwood Heath and part of Horsell Common as part of the Thames Basin Heaths Special Protection Area, and Thursley, Ash and Pirbright SAC. The need to prevent adverse impact on the designated area could impact on the ability to deliver the development set out in the preferred option. The same applies to Flood Risk.
- 1.17 Method of minimising risk: Appropriate Assessments and a Strategic Flood Risk Assessment have been undertaken to inform this issue.