

## Representations on Core Strategy Policies

This note has been prepared by the Planning Policy team in consultation with an Independent Consultant. The document represents Officer opinion and will not prejudice the decisions of the Planning Committee.

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The Planning System: General Principles, which accompanies Planning Policy Statement 1: Delivering Sustainable Development (<http://www.communities.gov.uk/index.asp?id=1143815>) provides guidance on determining planning applications. Of particular note are the following two paragraphs:

- *“Local planning authorities must determine planning applications in accordance with the statutory Development Plan, unless material considerations indicate otherwise. If the Development Plan contains material policies or proposals and there are no other material considerations, the application should be determined in accordance with the Development Plan. Where there are other material considerations, the Development Plan should be the starting point, and other material considerations should be taken into account in reaching a decision. One such consideration will be whether the plan policies are relevant and up to date. The 2004 Act provides that if there is a conflict between policies in an RSS or policies in a DPD, the most recent policy will take precedence.*
- *Where a DPD has been submitted for examination but no representations have been made in respect of relevant policies, then considerable weight may be attached to those policies because of the strong possibility that they will be adopted. The converse may apply if there have been representations which oppose the policy. However, much will depend on the nature of those representations and whether there are representations in support of particular policies.”*

In light of this advice, the following table sets out the weight that should be attached to the submitted Core Strategy policies. Weight has been determined based on a graduation of significant, moderate and minimal levels of weight, according to the number and nature of representations received:

- Significant Weight: where significant weight should be attached to the policy in instances where no objections have been received or where objections to omissions have been raised.
- Moderate Weight: where significant weight should be attached to the policy in light of objections made to a policy.
- Minimal Weight: where significant objections have been raised.

Policy	Objection	Weight to Attach
GDC1: Design of new development	<ul style="list-style-type: none"> <li>• The main objections were from local residents who were concerned that the policy would not provide adequate protection of UASRC's. Objections were raised on the basis that the policy does not have regard to the ecological value of back gardens – again, this is an objection raised by residents living in existing UASRC's.</li> <li>• An objection was raised on the basis that TPO's were to be abolished.</li> <li>• Objections were also raised based on the indicator for monitoring the policy.</li> </ul>	<p>Significant weight should be attached to GDC1g) – k).  Only moderate weight should be attached to GDC1a) – f).</p>
GDC2: Sustainable construction	<ul style="list-style-type: none"> <li>• GDC2a) was considered to be unduly onerous, inflexible and likely to make some schemes financially unviable.</li> <li>• An objection was raised because the policy does not consider the impact of climate change arising from transport.</li> </ul>	<p>GDC2b) – f) should be awarded significant weight.  Only minimal weight should be attached to GDC2a)</p>
GDC3: Transport, highway safety and vehicle parking	<ul style="list-style-type: none"> <li>• The policy should set out thresholds for when Travel Plans are required.</li> <li>• The Council's adopted Parking Standards SPD does not provide sufficient parking restraint in the core of the town centre.</li> </ul>	<p>Significant weight should be attached to GDC3. Thresholds need not form part of the core policy; they are amplification of policy which can be considered as a part of the Reasoned Justification or SPD. The Parking Standards SPD has been through due process and is not the subject of consideration.</p>
GDC4: Environmental impact of development	<ul style="list-style-type: none"> <li>• The first paragraph should read "where they do not have a significantly adverse effect on the following".</li> <li>• The document refers to contaminated land rather than "land affected by contamination"</li> <li>• Reference to crime should be deleted from this policy.</li> </ul>	<p>Moderate weight should be attached to this policy. The objections raised are not significant and do not undermine the principal of the policy.</p>
GDC5: Planning obligations	<ul style="list-style-type: none"> <li>• Reference should be made to the definition of infrastructure as set out in the SEP.</li> </ul>	<p>Moderate weight should be attached to this policy. The objections raised are not significant</p>

	<ul style="list-style-type: none"> <li>Level and principle of obligations should be dealt with via negotiation to reflect viability of the scheme and in order to take in to account other community planning benefits.</li> </ul>	and do not undermine the principal of the policy. The definition of infrastructure already exists in the SEP and need not be repeated in the policy.
GDC6: Biodiversity	<ul style="list-style-type: none"> <li>Objection to use of words 'where appropriate' as this is not in conformity with paras iii) and vi) of PPS9, which requires mitigation to be provided on <i>all</i> sites.</li> </ul>	Significant weight should be attached to this policy.
GDC7: Water and sewerage treatment works	<ul style="list-style-type: none"> <li>The use of SuDs should be promoted in line with the Council's SFRA.</li> <li>The Core Strategy should refer to the definition of infrastructure as set out in the South East Plan.</li> </ul>	Significant weight should be attached to this policy. The use of SuDs is addressed in policy GDC2 and it is not necessary to repeat it here. The definition of infrastructure already exists in the SEP and need not be repeated in the policy.
ENV1 National and international nature conservation designations	<ul style="list-style-type: none"> <li>The policy should be amended to take in to account the TBH delivery plan when available.</li> </ul>	Significant weight should be attached to this policy. The TBH delivery plan is not a statutory document. In any event the Council must have regard to national policy and the provisions of the Habitat Regulations.
ENV2: Local and regional nature conservation designations	<ul style="list-style-type: none"> <li>Policy implies that some development related impacts may be unavoidable which is inconsistent with GDC6 and may impede application of GDC6</li> <li>Policy should ensure that developers mitigate against any adverse or potentially adverse effect on nature conservation sites in line with PPS9.</li> </ul>	Significant weight should be attached to the 1 <sup>st</sup> paragraph of this policy. Minimal weight should be attached to the second paragraph.
ENV3: Areas at risk of flooding	<ul style="list-style-type: none"> <li>The policy is not based on the findings of an SFRA x 3</li> <li>The policy may not be in line with PPS25.</li> <li>The policy may need to be revised in light of the outcome of the South East Plan EiP.</li> </ul>	Moderate weight should be attached to this policy. The policy does not have to reflect the findings of the SFRA – the Proposals Map but show the boundaries and the Council should use the SFRA in determining applications, etc. Any changes to the SEP will not mean that the Core Strategy policy will need to change.
DC1: Historic environment	None	Significant weight should be attached to this policy
DC2: Strategic	None	Significant weight should be attached to this

approach to design in Woking town centre		policy
GB1: Green Belt	<ul style="list-style-type: none"> <li>• Martins Press should be included as a MDS (will be subject to consultation under Reg. 32).</li> <li>• Woking Sewerage Treatment Works should be included as a MDS (Not duly made)</li> </ul>	Significant weight should be attached to this policy.
GB2: Safeguarded long term development sites	<ul style="list-style-type: none"> <li>• Policy should state that Transport Assessments will be required</li> <li>• Release of the sites should be part of the Site Allocations DPD</li> <li>• Consider that the safeguarded sites are site allocations and should then be subject to the Site Allocations DPD</li> <li>• There is no criteria to determine when the sites will be released and which one will be first</li> <li>• The decision to release the sites has not been based on a robust and credible evidence base</li> <li>• Concern about impact of release of Brookwood Farm on nature conservation designations.</li> </ul>	Minimal weight should be attached to this policy.
H1: Housing target	<ul style="list-style-type: none"> <li>• Concern that policy is not in conformity with PPS3</li> <li>• Housing target is unlikely to be adequate to meet requirement of emerging South East Plan</li> <li>• Seeks a commitment to prepare a Housing Delivery Action Plan in accordance with the South East Plan</li> <li>• Seek a commitment to make better use of existing housing stock.</li> </ul>	Significant weight should be attached to this policy. The detail of implementation will be set out in a Housing Implementation SPD. It is not an enabling DC policy.
H2: Strategic approach to location of new housing	<ul style="list-style-type: none"> <li>• Concern that policy is not in conformity with PPS3</li> <li>• Density thresholds are a matter for a DC DPD</li> <li>• Density range for Town Centre is too high</li> <li>• No density ranges are set out for the safeguarded sites</li> <li>• 30dph is too high for existing UASRC's.</li> </ul>	Moderate weight should be attached to this policy.
H3: Affordable housing	<ul style="list-style-type: none"> <li>• Concern that policy is not in conformity with PPS3</li> <li>• Policy is not founded on a robust and credible evidence base</li> <li>• Affordable housing requirement of 40% will make some</li> </ul>	Moderate weight should be attached to this policy.

	<p>schemes financially unviable</p> <ul style="list-style-type: none"> <li>• Concern regarding calculation of commuted sums</li> <li>• Affordable housing numbers must be considered in the calculations for total housing requirements and not treat affordable housing as separate</li> <li>• Policy should contain all key elements – deferring to SPD is unacceptable</li> <li>• No mechanisms are in place for implementation and monitoring</li> <li>• Concern over 'open book approach' to setting out the economics of a development</li> <li>• 60% affordable housing requirement is not in conformity with the SEP</li> <li>• Policy should provide flexibility in terms of quantum and tenure to reflect scheme viability and other planning benefits</li> <li>• Targets need to be set for different types of affordable housing to be in line with the SEP</li> <li>• A definition of affordable housing (in line with that set out in the SEP) is not included.</li> </ul>	
H4: Housing mix	<ul style="list-style-type: none"> <li>• The majority of the housing will be provided in the Town Centre and will therefore be 1 and 2 bed flats which will not provide a mix</li> <li>• Requirement for family housing should be a target.</li> </ul>	Significant weight should be attached to this policy.
H5: Proposals involving the loss of housing	None	Significant weight should be attached to this policy.
H6: Location of gypsy and traveller caravan sites	<ul style="list-style-type: none"> <li>• Following the Housing Needs Assessment for Gypsies and Travellers the policy should set out more locational criteria.</li> <li>• A separate DPD should be produced to address this issue.</li> <li>• There is confusion over the linkage between these sites and the definition of affordable housing.</li> </ul>	Moderate weight should be attached to this policy.
E1: Location of new employment	<ul style="list-style-type: none"> <li>• Policy should specify that Transport Assessments should be prepared where developments are likely to have significant</li> </ul>	Significant weight should be attached to the first part of this policy. Moderate weight should be

generating development	<p>transport implications</p> <ul style="list-style-type: none"> <li>• Policy may provide perverse incentives for location of offices outside of the town centre.</li> </ul>	attached to the last paragraph of this policy.
E2: Proposals involving the loss of employment generating development	<ul style="list-style-type: none"> <li>• Qualified support to policy on the condition that the Council supports the development of Martins Press for residential use. Without this, there is an objection on the basis that the Council has previously responded positively to the loss of this site to residential.</li> </ul>	Significant weight should be attached to this policy.
E3: Hotels and overnight accommodation	<ul style="list-style-type: none"> <li>• Qualify that large movement generating hotels will only be accepted in the most accessible locations.</li> <li>• Policy does not include anything regarding the Council's position on retention of existing accommodation.</li> </ul>	Moderate weight should be attached to this policy.
RET1: Location of new retail development (A1-A5)	None	Significant weight should be attached to this policy.
RET2: Primary and secondary retail frontages	None	Significant weight should be attached to this policy.
LC1: Location of recreation, leisure and community facilities	<ul style="list-style-type: none"> <li>• Whilst in general terms, the priority should be to locate such uses that are compatible with the town centre in the town and local centres, other uses may not be compatible with such central locations (Woking FC)</li> <li>• Mixed use community facilities should be encouraged to make the best use of resources and in order to be in line with the SEP.</li> </ul>	Significant weight should be attached to this policy.
LC2: Loss of existing leisure and community facilities	<ul style="list-style-type: none"> <li>• The policy should refer to the definition of infrastructure as set out in the South East Plan</li> <li>• Mixed use community facilities should be encouraged to make the best use of resources and in order to be in line with the SEP.</li> </ul>	Significant weight should be attached to this policy.
LC3: Location of new public open space	<ul style="list-style-type: none"> <li>• Qualification required that proposals for Brookwood Country Park need to be subject to Appropriate Assessment</li> </ul>	Significant weight should be attached to this policy.

and outdoor sports facilities	<ul style="list-style-type: none"> <li>Omission of new open space at Martins Press site should permission be granted.</li> </ul>	
LC4: Development involving the loss of public open space	None	Significant weight should be attached to this policy.
LC5: Provision of new recreational open space	None	Significant weight should be attached to this policy.
REN1: Sustainable and renewable energy	Policy should include requirement for amount of renewable energy required from new development.	Significant weight should be attached to this policy. The point of objection is covered by Policy GDC2.
TRA1: Strategic approach to new transport development	Mechanisms are not in place to monitor growth in traffic and to put in place mitigation measures where necessary.	Significant weight should be attached to this policy. Some mechanisms are in place; however, this is really a LTP issue.
IP1: Site assembly and land acquisition	None	Significant weight should be attached to this policy.

## **Appendix 1 – Summary of Representations**

### **GDC1: Design of new development**

Reps received:

- 1 support
- 5 objections to part of policy
- 2 objections to omissions from policy
- 4 general comments

Summary of objections:

- Need to have regard to biodiversity and recognition of ecological value of brownfield sites/ back gardens x 2
- Objection to indicator x 2
- Objection to loss of UASRC's – GDC1 is not adequate to protect character of these areas and 30dph is too high.
- Objection to loss of TPO's.

Summary of general comments:

- Need to have regard to biodiversity and recognition of ecological value of brownfield sites/ back gardens
- Para. 6.10 implies that all development requires parking provision
- GDC1j) – definition of 'area appropriate' should be clarified.

### **GDC2: Sustainable Construction**

Reps received:

- 4 support
- 6 objections to part of policy

Summary of objections:

- Climate change arising from transport is not mentioned
- The requirements for carbon reduction of 40% over prevailing Building Regulations are unduly onerous, inflexible and may make some schemes unviable x 3
- Forthcoming changes to Building Regulations will make 40% reduction requirement redundant.

### **GDC3: Transport, highway safety and vehicle parking**

Reps received:

- 3 objections to part of the policy
- 1 objection to omissions from policy
- 3 general comments

Summary of objections:

- Need to set thresholds for when Travel Plans and Transport Assessments are required x 3
- Woking's Parking Standards SPD is not believed to provide sufficient restraint in the core area of the Town Centre.

Summary of general comments:

- Travel Plans should also be required for leisure and retail developments, etc.
- Para. 6.25 should be expanded to include that planning obligations may be sought for reasons other than highway safety
- GDC3f) and g) would be better placed in policy ENV1.

#### **GDC4: Environmental impact of development**

Reps received:

- 3 objections to part of the policy

Summary of objections:

- The document refers to contaminated land rather than land affected by contamination
- Reference to crime should not be included in this policy
- Policy should refer to development that would have a 'significantly adverse effect'

#### **GDC5: Planning Obligations**

Reps received:

- 1 support
- 3 objections to omissions from policy

Summary of objections:

- Level and principle of obligations should be dealt with via negotiation to reflect viability of the scheme and in order to take in to account other community planning benefits x 2 (from 1 source, but objections based on 2 different tests of soundness)
- The Core Strategy should refer to the definition of infrastructure as set out in the South East Plan.

#### **GDC6: Biodiversity**

Reps received:

- 1 objection to part of the policy

Summary of objection:

Objection to use of words 'where appropriate' as this is not in conformity with paras iii) and vi) of PPS9, which requires mitigation to be provided on *all* sites.

#### **GDC7: Water and sewerage infrastructure capacity**

Reps received:

- 1 support
- 1 objection to part of the policy
- 1 objection to an omission from the policy

Summary of objections:

- The use of SuDs should be promoted in line with the Council's SFRA
- The Core Strategy should refer to the definition of infrastructure as set out in the South East Plan.

### **ENV1: National and International nature conservation designations**

Reps received:

- 3 objections to part of the policy (from 1 source, objections based on 3 different tests of soundness)

Summary of objection:

The policy should be amended to take in to account the TBH delivery plan when available.

### **ENV2: Local and Regional nature conservation designations**

Reps received:

- 2 objections to part of the policy

Summary of objections:

- Policy implies that some development related impacts may be unavoidable which is inconsistent with GDC6 and may impede application of GDC6
- Policy should ensure that developers mitigate against any adverse or potentially adverse effect on nature conservation sites in line with PPS9.

### **ENV3: Areas at risk of flooding**

Reps received:

- 7 objections to part of the policy

Summary of objections:

- The policy is not based on the findings of an SFRA x 3
- The policy may not be in line with PPS25
- The policy may need to be revised in light of the outcome of the South East Plan EIP.

### **DC1: Historic Environment**

Reps received:

- None

### **DC2: Strategic approach to design in Woking Town Centre**

Reps received:

- None

### **GB1: Green Belt**

Reps received:

- 1 support (McLarens support the policy and request that it be designated MDS in the Site Allocations DPD)
- 2 objections to part of policy

Summary of objections:

- Martins Press should be included as a MDS (will be subject to consultation under Reg. 32).
- Woking Sewerage Treatment Works should be included as a MDS (Not duly made)

## **GB2: Safeguarded long term development sites**

Reps received:

- 15 objections to part of policy
- 1 objection to omission from policy
- 1 general comment

Summary of objections:

- Policy should state that Transport Assessments will be required
- Release of the sites should be part of the Site Allocations DPD
- Consider that the safeguarded sites are site allocations and should then be subject to the Site Allocations DPD
- There is no criteria to determine when the sites will be released and which one will be first
- The decision to release the sites has not been based on a robust and credible evidence base
- Concern about impact of release of Brookwood Farm on nature conservation designations.

## **H1: Housing target**

Reps received:

- 7 objections to part of policy
- 2 objection to omission from policy

Summary of objections:

- Concern that policy is not in conformity with PPS3
- Housing target is unlikely to be adequate to meet requirement of emerging South East Plan
- Seeks a commitment to prepare a Housing Delivery Action Plan in accordance with the South East Plan
- Seek a commitment to make better use of existing housing stock.

## **H2: Strategic approach to location of new housing**

Reps received:

- 1 support
- 9 objections to part of policy
- 2 objection to omission from policy

Summary of objections:

- Concern that policy is not in conformity with PPS3
- Density thresholds are a matter for a DC DPD
- Density range for Town Centre is too high

- No density ranges are set out for the safeguarded sites
- 30dph is too high for existing UASRC's.

### **H3: Affordable Housing**

Reps received:

- 26 objections to part of policy
- 4 objection to omission from policy

Summary of objections:

- Concern that policy is not in conformity with PPS3
- Policy is not founded on a robust and credible evidence base
- Affordable housing requirement of 40% will make some schemes financially unviable
- Concern regarding calculation of commuted sums
- Affordable housing numbers must be considered in the calculations for total housing requirements and not treat affordable housing as separate
- Policy should contain all key elements – deferring to SPD is unacceptable
- No mechanisms are in place for implementation and monitoring
- Concern over 'open book approach' to setting out the economics of a development
- 60% affordable housing requirement is not in conformity with the SEP
- Policy should provide flexibility in terms of quantum and tenure to reflect scheme viability and other planning benefits
- Targets need to be set for different types of affordable housing to be in line with the SEP
- A definition of affordable housing (in line with that set out in the SEP) is not included.

### **H4: Housing mix**

Reps received:

- 1 support
- 2 objections to part of policy
- 2 objection to omission from policy

Summary of objections:

- The majority of the housing will be provided in the Town Centre and will therefore be 1 and 2 bed flats which will not provide a mix
- Requirement for family housing should be a target.

### **H5: Proposals involving the loss of housing**

Reps received:

- None

### **H6: Location of Gypsy and Traveller Caravan Sites**

Reps received:

- 3 objections to part of the policy

Summary of objections:

- Following the Housing Needs Assessment for Gypsies and Travellers the policy should set out more locational criteria
- A separate DPD should be produced to address this issue
- There is confusion over the linkage between these sites and the definition of affordable housing.

### **E1: Location of new employment generating development**

Reps received:

- 1 support
- 3 objections to part of the policy

Summary of objections:

- Policy should specify that Transport Assessments should be prepared where developments are likely to have significant transport implications
- Policy may provide perverse incentives for location of offices outside of the town centre.

### **E2: Proposals involving the loss of employment generating development**

Reps received:

- 1 objection to part of the policy

Summary of objection:

Qualified support to policy on the condition that the Council supports the development of Martins Press for residential use. Without this, there is an objection on the basis that the Council has previously responded positively to the loss of this site to residential.

### **E3: Hotels and overnight accommodation**

Reps received:

- 1 support
- 2 general comments

Summary of general comments:

- Qualify that large movement generating hotels will only be accepted in the most accessible locations
- Policy does not include anything regarding the Council's position

### **RET1: Location of new retail development (A1-A5)**

Reps received:

- None

### **RET2: Primary and secondary shopping frontages**

Reps received:

- 1 support

### **LC1: Location of recreation, leisure and community facilities**

Reps received:

- 3 support
- 3 objections to omissions to policy

Summary of objections:

- Whilst in general terms, the priority should be to locate such uses that are compatible with the town centre in the town and local centres, other uses may not be compatible with such central locations (Woking FC)
- Mixed use community facilities should be encouraged to make the best use of resources and in order to be in line with the SEP.

### **LC2: Loss of existing leisure and community facilities**

Reps received:

- 2 support
- 2 objections to omissions to policy

Summary of objections:

- The policy should refer to the definition of infrastructure as set out in the South East Plan
- Mixed use community facilities should be encouraged to make the best use of resources and in order to be in line with the SEP.

### **LC3: Location of new public open space and outdoor sports facilities**

Reps received:

- 1 objection to part of policy
- 1 objections to omissions to policy

Summary of objections:

- Qualification required that proposals for Brookwood Country Park need to be subject to Appropriate Assessment
- Omission of new open space at Martins Press site should permission be granted.

### **LC4: Development involving the loss of public open space**

Reps received:

- 2 support

### **LC5: Provision of new recreational open space**

Reps received:

- 1 support

### **REN1: Sustainable and renewable energy**

Reps received:

- 1 support
- 2 objections to part of policy

Summary of objections:

Policy should include requirement for amount of renewable energy required from new development.

### **TRA1: Strategic approach to new transport development**

Reps received:

- 1 objection to part of policy

Summary of objection:

Mechanisms are not in place to monitor growth in traffic and to put in place mitigation measures where necessary.

### **IP1: Site assembly and land acquisition**

Reps received:

- None.