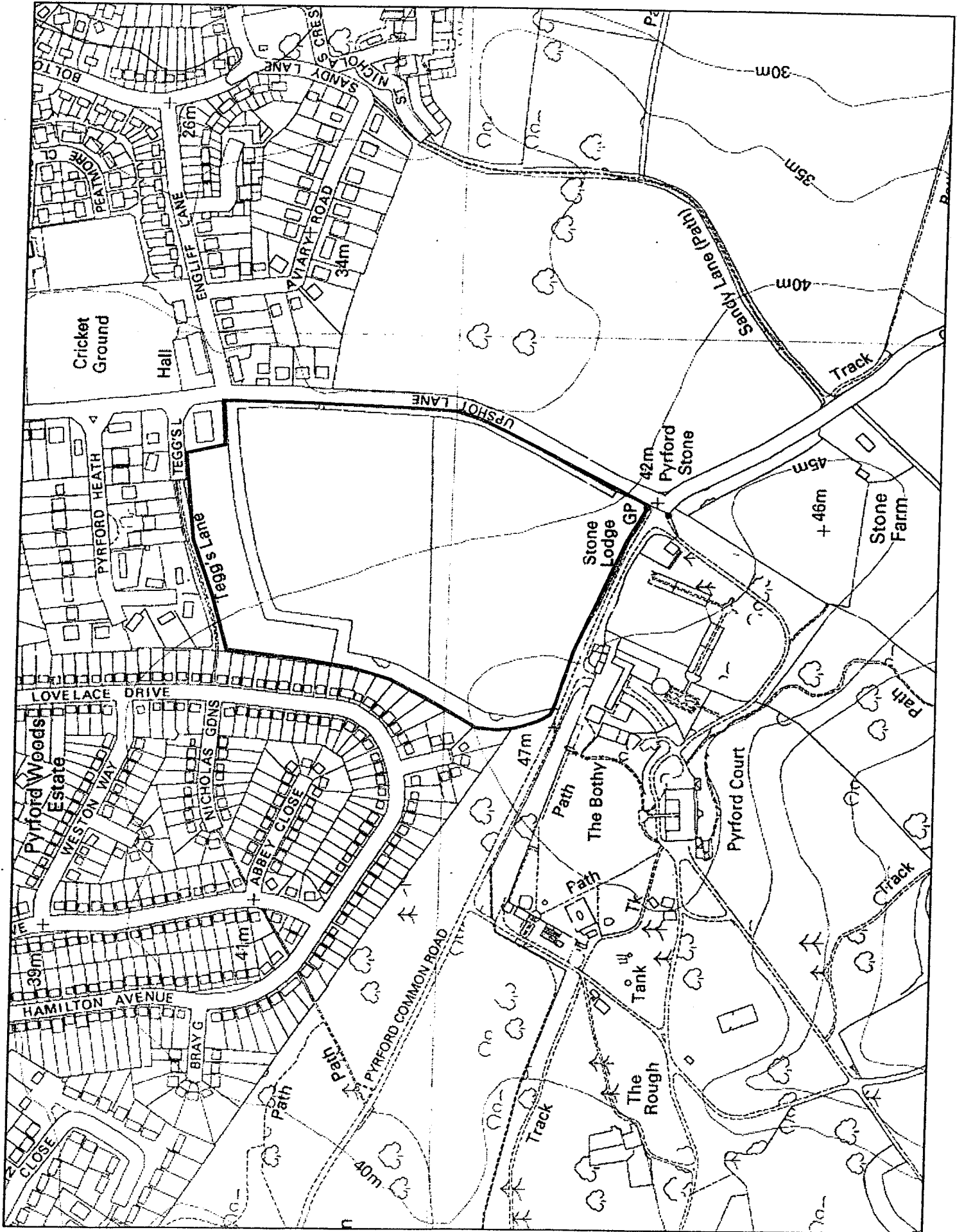


Randall's Field
PLAN 1
1 : 5000





REPRESENTATIONS ON THE WOKING LOCAL DEVELOPMENT FRAMEWORK
CORE STRATEGY
SUBMISSION STAGE

Woking Borough Council has now prepared its Core Strategy for public consultation and submission to the Secretary of State for independent examination. The Core Strategy sets out the Council's approach to development which meets the needs of the Borough and policies to guide development.

- If you wish to support or object to all or part of the Core Strategy please use this form. There are notes on the back of this form which may help you make your representation.
- Please **complete in full** and **use a separate form for each representation** that you wish to make. You can generally support the document, or object to specific content and recommend changes.
- You can photocopy the form or obtain further copies from the Civic Offices Planning Reception at the address below, or from Byfleet, West Byfleet, Knaphill and Woking libraries, or Sheerwater Neighbourhood Office. You can also find an electronic form and a printable version on our website: [www.woking.gov.uk/council/planning/ldf/Core Strategy](http://www.woking.gov.uk/council/planning/ldf/Core%20Strategy)
- Forms should be returned to: **Planning Policy, Woking Borough Council, Civic Offices, Gloucester Square, Woking, Surrey GU21 6YL**
- Representations received after 5pm on Tuesday 12 December 2006 will not be considered.

SECTION 1: NATURE OF REPRESENTATION

Please circle one of the following.

- Are you?
- A. Supporting all of the Core Strategy (go to Section 5)
 - B. Supporting part of the Core Strategy
 - C. Objecting to part of the Core Strategy
 - D. Objecting to the omission of a section or text within the Core Strategy

Please choose and respond to only one of the options.

B. If you are **supporting part of the** Core Strategy to which part of the Core Strategy does your representation relate?

Section Paragraph

Please go to Section 5

C. If you are **objecting to part of the** Core Strategy to which part of the Core Strategy does your representation relate?

Section Paragraph

Please go to Section 2

D. If you are **objecting to the omission of a section or text within the** Core Strategy to which part of the Core Strategy does your representation relate?

Section Paragraph

Please go to Section 2

SECTION 2: REASON FOR OBJECTION

Your objection needs to relate to one of the 'tests of soundness'. If you are objecting to the Core Strategy **please specify** on which of the tests of soundness you consider that this part of the Core Strategy fails. Please note you should complete a separate form for each test you consider the Core Strategy fails

| | | |
|---|---|---|
| 1 | | It has not been prepared in accordance with the authority's Local Development Scheme (LDS). |
| 2 | A | It has not been prepared in compliance with the Statement of Community involvement (SCI). |
| | B | Where no SCI exists, it has not been prepared in accordance with the minimum requirements of the Town and Country Planning (Local Development) (England) Regulations 2004. |
| 3 | | The plan and its policies have not been subject to sustainability appraisal. |
| 4 | A | It is not a spatial plan, or it has not properly had regard to any other relevant plans, policies and strategies relating to the area or to adjoining areas. |
| | B | It is inconsistent with national planning policy. |
| | C | It is not in general conformity with the regional spatial strategy (or spatial development strategy in London). |
| 5 | | It does not have regard to the authority's community strategy. |
| 6 | | The strategies/policies/allocations in the plan are not coherent and consistent within and between Development Plan Documents (DPDs) prepared by the authority and by neighbouring authorities, where cross boundary issues are relevant. |
| 7 | | The strategies/policies/allocations fail to represent the most appropriate in all the circumstances, having considered the relevant alternatives, and they are not founded on a robust and credible evidence base. |
| 8 | | There are no clear mechanisms for implementation and monitoring. |
| 9 | | The plan is not reasonably flexible to enable it to deal with changing circumstances. |

SECTION 3: CHANGES TO THE CORE STRATEGY

Please give details of the change(s) you would like to see to the Core Strategy and why, having regard to the test you have specified at 2 above. You will need to say why this change will make the Core Strategy sound. *Please be as precise as possible. (Use additional sheets if necessary.)*

BURHILL ESTATES CO LTD'S OBJECTION RELATES TO TEST OF SOUNDNESS 4B.
PLEASE SEE ATTACHED SHEET FOR FULL REPRESENTATION

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation. After this stage, further submissions will be only at the request of the Inspector, based on the issues he/she identifies for examination.

SECTION 4: Did you raise the matter that is the subject of your representation with the Council earlier in the process of the preparation of the Core Strategy, i.e. before it was submitted for examination?

Yes No

If 'No', can you briefly explain why you did not do so:

SECTION 5

In addition to your written representation you may also choose to make your representation orally at an Examination. Please specify whether your representation can be considered by written representations only or do you consider it necessary to attend the Examination?

Written Representation Attend Examination

If you consider it necessary to attend the Examination please explain why:

ISSUES OF CRITICAL IMPORTANCE POTENTIALLY REQUIRING NEED FOR IN-DEPTH DISCUSSION.

Please note: It is the decision of the Planning Inspectorate as to which procedure to adopt. A hearing will only be necessary where one or more of those making representations wish to be heard.

SECTION 6: Would you like to be notified of the publication of the recommendations of the Planning Inspector appointed to carry out the examination? YES / NO


SECTION 7: Would you like to be notified of the adoption of the Core Strategy? YES / NO

SECTION 8: CONTACT DETAILS

Personal Details

Agent Details (if applicable)

| | | |
|----------------------------|------------------------|---|
| Title | BURHILL ESTATES CO LTD | MR |
| First Name | | JAMES |
| Last Name | | CLEARY |
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| Post code | | SO21 2LD |
| Telephone No. | | 023 80 270 272 |
| Email Address | | j.cleary@pvprojects.com |

Signed: 

Date: 11/12/2006

IF YOU WOULD LIKE TO BE ADDED TO THE COUNCIL'S CONSULTATION DATABASE FOR THE PURPOSES OF CONSULTATION OF THE LOCAL DEVELOPMENT FRAMEWORK PLEASE TICK



REPRESENTATIONS ON THE WOKING LOCAL DEVELOPMENT FRAMEWORK
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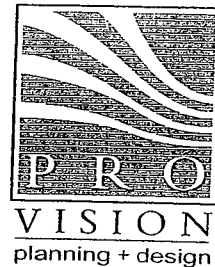
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Signed: _____ Date: 11/12/2006

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WOKING BOROUGH COUNCIL

**CORE STRATEGY SUBMISSION VERSION
REPRESENTATIONS**

**ON BEHALF OF
BURHILL ESTATES CO LTD**

Prepared by
Pro Vision Planning and Design

December 2006
Our ref: 664

Deer Park Court, Hursley, Winchester, Hampshire SO21 2LD
Telephone: 02380 270 272 Fax: 02380 270 274
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CONTENTS

| <u>SECTION</u> | <u>PAGE NO</u> |
|---|----------------|
| 1.0 INTRODUCTION..... | 1 |
| 2.0 PLANNING POLICY BACKGROUND..... | 3 |
| 3.0 CASE FOR OBJECTION..... | 7 |
| a) Prematurity and Failure to Consider Alternative Safeguarded Site Options | |
| b) Failure of the Core Strategy's Sustainability Appraisal to full assess the social, economic and environmental implications of the proposed Safeguarded Sites | |
| c) Failure to carry out a sequential test in relation to the proposed Safeguarded Sites | |
| 4.0 SUMMARY AND CHANGES SOUGHT..... | 13 |
| APPENDICES | |
| 1 Site Location Plan of Randall's Field | |
| 2 Constraints and Opportunities Analysis of Brookwood Farm, Moor Lane and Randall's Field | |
| 3 Masterplans and a schedule of proposed uses for Randall's Field | |

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1.0 INTRODUCTION

- 1.1 Pro Vision Planning and Design have been instructed by the Burhill Estates Co Ltd to object to the Submission Version of the Woking Borough Council Core Strategy.
- 1.2 In March 2006 Pro Vision submitted representations to the Woking Core Strategy preferred Options on behalf of Burhill in relation to Policies H1, H2, E1, E2, GB1 and GB2. It was argued that current safeguarded long-term development sites and Green Belt boundaries generally need to be re-assessed against current national planning policy (especially PPS1, PPG2 and PPG3 which all post date the last assessment), sustainable planning criteria generally and should take account of Environment Agency floodplain designations (and PPG25) and other environmental factors such as the Thames Basin Heath SPA.
- 1.3 The representations suggested that:
- Other sites such as Tegg's Lane (now known as Randall's Field), Pyrford may need to be allocated or safeguarded with consequential adjustments to the Green Belt boundary;
 - Brookwood Farm and Moor Lane are not well defined, defensible sites and, if properly tested, may not comply with relevant PPG3 guidance on Urban Extensions and other criteria; and
 - Additional Safeguarded Sites may be necessary to achieve the rates of development required by the South East Plan to 2026 and, as the Council acknowledge, high rates of development within the period to 2016 or 2021 are better able to meet social and economic needs especially those relating to affordable housing.
- 1.4 Burhill hold by these objections and now wish to object to the Submission Version of the Core Strategy on the basis that Woking Borough Council have not re-assessed the proposed Safeguarded long-term development sites and Green Belt boundaries against current national planning policy guidance. Burhill are seeking a full assessment of the proposed Safeguarded Sites and consideration of other suitable sites for long-term housing needs before work on the LDF is proceeded, to ensure that the Safeguarded

Sites are consistent with government guidance (especially PPS1, PPG2, PPG3 and PPS3).

- 1.5 This report sets out Burhill's objection in relation to Policy GB2 (Safeguarded long term development sites) and the changes sought to the Core Strategy and proposals map. Section 2 provides the planning policy background to this objection. Section 3 sets out the case behind the objection and the changes sought to the Core Strategy and proposals map. Section 4 provides a brief summary of the issues discussed and changes sought.

2.0 PLANNING POLICY BACKGROUND

- 2.1 Section 13 of the 2004 Planning and Compulsory Purchase Act requires Local Planning Authorities to keep under review the matters which may be expected to affect the development of the authority's area or the planning of its development. The designation of 'Safeguarded Long-Term Development Sites' is one such matter that could affect development, as they provide the potential direction for future development.

National Planning Guidance

- 2.2 **Planning Policy Statement (PPS) 1 – Delivering Sustainable Development** was issued in 2005 and sets out the government's overarching planning policies on the delivery of sustainable development through the planning system. Paragraph 5 is of particular relevance. It states that::

“planning should facilitate and promote sustainable and inclusive patterns of urban and rural development by making suitable land available for development in line with economic, social and environmental objectives to improve people's quality of life and ensuring that development supports existing communities and contributes to the creation of safe, sustainable, liveable and mixed communities with good access to jobs and key services for all members of the community”.

- 2.3 Paragraph 26 goes on to provide specific guidance on how Local Planning Authorities should prepare Development Plans including the need to ensure that plans and policies are properly based on analysis and evidence.
- 2.4 **Planning Policy Guidance (PPG) Note 2 – Green Belts** provides guidance on development in the Country's Green Belt as well as setting out how land within the Green Belt's should be protected. Paragraph 2.12 and Annex B provide specific guidance on Safeguarded Land.
- 2.5 Paragraph 12 advises that LPA's should consider the broad location of anticipated development beyond the plan period, its effects on urban areas contained by the Green Belt and on areas beyond it, and its implications for sustainable development.

- 2.6 Paragraph B2 of Annex B defines Safeguarded Land as comprising areas and sites which may be required to serve development needs in the longer term, i.e. well beyond the plan period and that they should be genuinely capable of development when needed.
- 2.7 Paragraph B3 continues to advise that Safeguarded Land should be located where future development would be an efficient use of land, well integrated with existing development, and well related to public transport and other existing and planned infrastructure, so promoting sustainable development.
- 2.8 Paragraph B4 provides guidance on identifying Safeguarded Land, advising that LPA's should take account of the advice on housing in PPG3 and on transport in PPG13. They should also have regard to environmental and landscape quality, to the contribution which future redevelopment might have to remedying urban fringe problems and producing attractive, well landscaped urban edges.
- 2.9 **Planning Policy Guidance (PPG) Note 3 – Housing**, was published in 2000 and provides guidance on a range of issues relating to the provision of housing, including advice on identifying, allocating and releasing areas and sites for residential development (paragraphs 28 to 34). Paragraph 31 of PPG3 sets out the government's criteria against which Local Planning Authorities should assess the potential and suitability of sites for residential development. The criteria are as follows:
- The availability of previously-developed sites and empty or under-used buildings and their suitability for housing use;
 - The location and accessibility of potential development sites to jobs, shops and services by modes other than the car, and the potential for improving accessibility;
 - The capacity of existing and potential infrastructure, including public transport, water and sewerage, other utilities and social infrastructure (such as schools and hospitals) to absorb further development and the cost of adding further infrastructure;
 - The ability to build communities to support new physical and social infrastructure to provide sufficient demand to sustain appropriate local services and facilities; and

- The physical and environmental constraints on development of land, including, for example, the level of contamination, stability and flood risk, taking into account that such risk may increase as a result of climate change.

- 2.10 **Planning Policy Statement (PPS) 3 – Housing** was published in November 2006 and replaces Planning Policy Guidance Note 3. Paragraph 8 of the statement advises that Local Planning Authorities are not required to have regard to this statement as a material consideration when making decisions on planning applications until 1 April 2007, although it may be capable of being a material consideration, in particular circumstances, prior to this date.
- 2.11 Paragraph 36 acknowledges that the Government's policy is to ensure that housing is developed in suitable locations which offer a range of community facilities and with good access to jobs, key services and infrastructure. Paragraph 38 goes on to set out a range of criteria which LPA's should take into consideration when identifying broad locations and specific sites for housing development. In addition to taking the criteria at paragraph 38 into account paragraph 39 advises that LPA's should undertake Sustainability Appraisal's to develop and test various options, considering, for each, the social, economic and environmental implications, including costs, benefits and risks.
- 2.12 Paragraphs 52 to 57 provide guidance on delivering a flexible supply of land for housing, advising that LPA's should set out in LDD's their policies and strategies for delivering the level of housing provision, including identifying broad locations and specific sites that will enable continuous delivery of housing for at least 15 years from the date of adoption.
- 2.13 **Planning Policy Guidance Note 13 (PPG13) – Transport** was published in March 2001 and provides guidance on how to manage travel demand as well as identifying how transport impacts on other planning policies and land uses, including housing. Paragraphs 75 to 80 are of particular importance. They deal specifically with development and the potential to encourage walking and cycling. Paragraph 75 states that "walking is the most important mode of travel at the local level and offers the greatest potential to replace short car trips, particularly under 2km".

Regional Planning Guidance

- 2.14 The draft Regional Spatial Strategy for the South East was submitted to the Government by the South East Regional Assembly on 31 March 2006. The Plan is subject of an Examination in Public between 28 November 2006 and 30 March 2007 which is expected to lead to Government approval of a final South East Plan in early 2006.
- 2.15 Policy CC1 of the Plan supports the principles of PPS1, emphasising that the principal objective of the plan shall be to achieve and to maintain sustainable development in the region.
- 2.16 Policy H3 deals specifically with the location of housing, stating that new houses need to meet the district requirements whether previously developed land or on greenfield land, should be in sustainable locations which have the necessary infrastructure, services and community provision, or where this provision is planned. Housing developments should generally be in locations that are, or can be, well served by a choice of transport modes, with higher densities in and near locations well served by public transport.

Barker Review of Land Use Planning – December 2006

- 2.17 Although not part of current planning policy it is relevant to note the findings of Kate Barker's review of land use planning, particularly in relation to Green Belts.
- 2.18 Paragraph 2.40 of the final report acknowledges that there is likely to be increased need for Green Belt reviews to ensure that the development that takes place in England is genuinely sustainable (with careful evaluation of the different environmental impacts of different patterns of development). The paragraph continues to recommend that policy framework's should clearly allow for this, stating that given the high proportion of land that is Green Belt, limited and properly justified change of classification could be allowed without jeopardising the overall goals for which Green Belts are designated.

3.0 CASE FOR OBJECTION

- 3.1 Proposed Policy GB2 identifies two Safeguarded Long Term Development Sites at Brookwood Farm and Moor Lane, which will be released if required to make up for a shortfall in either overall housing provision to meet proposed Policy H1 or the need for affordable housing identified through proposed Policy H3. Both of these sites are currently allocated as Safeguarded Sites in the Adopted Woking Borough Local Plan through Policies HSG05 (Moor Lane) and HSG06 (Brookwood Farm).
- 3.2 The Council's decision not to review the allocated Safeguarded Sites is contrary to National Planning Guidance (including PPG 3 and PPS 3) and Section 13 of the 2004 Planning and Compulsory Purchase Act which requires Local planning Authorities to keep under review matters which may be expected to affect development. The Core Strategy is thus not considered to comply with tests (iv) or (vii) of the Tests of Soundness, as set out in PPS12. The Core Strategy is therefore considered to be unsound.
- 3.3 Burhill consider there to be four principal concerns about the Core Strategy, each of which mean the Strategy does not conform with national planning policy and does not comply with tests (iv) or (vii) of the tests of soundness. The concerns are as follows:
- a) The allocation of site specific Safeguarded Sites is premature and the Strategy has not considered alternative Safeguarded Site options;
 - b) The Strategy's Sustainability Appraisal has not fully assessed the social, economic and environmental implications of the proposed Safeguarded Sites;
 - c) The Strategy has not assessed whether the Safeguarded Sites are sequentially preferable;
 - d) The Strategy does not make sufficient housing land supply for 15 years;

Points (a) – (c) relate to proposed Policy GB2 (Safeguarded long term development sites) and are addressed below. Point (d) refers to paragraph 4.1 of the Strategy and is addressed through separate objection.

a) Prematurity and Failure to Consider Alternative Safeguarded Site Options

3.4 The purpose of the Core Strategy is to set out the long term vision and spatial strategy for the Authority's area and the strategic policies required to deliver the vision. The Strategy should set out broad locations for delivering housing and other strategic development needs. Government guidance clearly acknowledges that the Core Strategy should not identify individual sites for development and that this will be dealt with through the Site Allocations DPD at a later stage.

3.5 The Core Strategy Issues and Options Report (June 2005) set out four options for the future development of Woking as follows:

- Option 1 – reduced rate of development – 200 dwellings per annum;
- Option 2 – trend rate of development – focussing development in Woking Town Centre – 280 dwellings per annum;
- Option 3 – above trend rate of development – focussing development on Woking Town Centre, and also in primary employment areas, West Byfleet and Moor Lane, Westfield – 340 dwellings per annum (would involve the provision of affordable housing on the safeguarded site at Moor Lane);
- Option 4 – as Option 3 with the addition of Brookwood Farm, Knaphill – 370 dwellings per annum (would involve the provision of affordable housing on the Safeguarded Site at Brookwood Farm).

3.6 Subsequently the Core Strategy Preferred Option approved by the Council's Executive Committee was to:

“Focus development on previously developed land in the urban area of the Borough, and in particular to focus higher density development in and around Woking Town Centre, which is the most sustainable location in the Borough”

3.7 In addition Key Objective 3 of the Preferred Option noted that

“if the preferred strategy (Option 2 of the Issues and Options) proves insufficient to meet the South-East Plan housing requirements, or meet the specific need for affordable housing in Woking identified through a Housing Needs Assessment, then part or all of the safeguarded long-term development sites will be released for housing development”.

This is a component of Options 3 and 4 in the Issues and Options consultations.

- 3.8 Consequently the Core Strategy Submission Version proposes Policy GB2 which seeks to retain the two Safeguarded Sites identified in the adopted Local Plan at Moor Lane and Brookwood Farm as sites to meet long term housing need.
- 3.9 The identification of these sites goes beyond the remit of the Core Strategy which is to identify "broad locations" for delivering housing and other strategic development needs. The Core Strategy is thus not considered to comply with test (iv) of the Tests of Soundness, as set out in PPS12.
- 3.10 Furthermore, in progressing the preferred strategy for growth in Woking between 2006 and 2026 the Council formulated 4 options internally before consultation. Inclusion of the Safeguarded Sites (Options 3 and 4) received little support throughout the public consultation periods. However, the two sites are to be retained as Safeguarded Sites to make up any shortfall in housing provision or affordable housing. It is therefore not clear how the Preferred Option for development in the Woking Borough (in particular the designation of Safeguarded Sites) was selected.
- 3.11 It should also be noted that at no stage during the preparation of the Core Strategy were alternative Safeguarded Sites considered.

b) Failure of the Core Strategy's Sustainability Appraisal to fully assess the social, economic and environmental implications of the proposed Safeguarded Sites

- 3.12 Section 39 (2) of the Planning and Compulsory Purchase Act (2004) advises that sustainability approval is mandatory for RSS revision and for new or revised DPD's or SPD's.
- 3.13 Paragraph 1.12 of the Department for Communities (ODPM at time of publication) guidance on Sustainability Appraisal's of RSS's and LDD's advises that:

"if a RSS revision or a DPD proposes a specific infrastructure project, development or type of land use for a particular area or location the Sustainability Appraisal report should include information which can reasonably be provided on the likely significant effects of the proposal and alternatives to it".

- 3.14 The Woking Core Strategy Sustainability Appraisal refers to the proposed Safeguarded Sites on several occasions, principally acknowledging that the overall scale of residential development in the Borough would be at least that in the South East Plan, with an average of 242 new homes per annum (2006-2026) and the potential to increase provision on Safeguarded Sites specifically to provide affordable housing.
- 3.15 The Appraisal does not provide a specific analysis of the proposed Safeguarded Sites and the likely effects of the proposals. Neither are alternatives to the sites explored through the Appraisal. This is consistent with the wider Core Strategy preparation which has failed to provide a full analysis of why the Safeguarded Sites have been allocated in the Strategy.
- 3.16 With reference to the consideration of alternative sites the Core Strategy Pre-Submission Consultation Statement (October 2006) sets out the Council's responses to Burhill's original representations. The responses in relation to the need to review the proposed Safeguarded Sites are as follows:

"The Safeguarded Sites meet or can meet adequate standards of sustainability and are currently excluded from the Green Belt. As such they remain suitable to be retained as Safeguarded Sites"

And

"It is not considered that the Green Belt boundary needs to be reviewed, or reassessed against national guidance.....Research found that the required growth in the Borough can be accommodated within the urban area. PPG2 outlines that alteration to the Green Belt boundaries should only be undertaken in exceptional circumstances and it is not considered that these circumstances exist"

- 3.17 The Council's responses do not cross reference research or evidence that justifies why the Safeguarded Sites meet adequate standards of sustainability and remain suitable to be retained as Safeguarded Sites'. The Core Strategy is thus considered to be unsound when considered against tests of soundness (iv) and (iiv), in that the Strategy:
- Has not assessed the sustainability of the proposed Safeguarded Sites and is thus inconsistent with national planning policy; and
 - Does not represent the most appropriate allocations, having considered the relevant alternatives and the allocations are not founded on a robust and credible evidence base.

- 3.18 It is therefore requested that a full Sustainability Appraisal is undertaken of the proposed Safeguarded Sites, including the consideration of alternative sites before work on the LDF is proceeded in order to comply with national planning policy and ensure that the most appropriate sites are allocated.
- c) Failure to carry out a sequential test in relation to the proposed Safeguarded Sites.**
- 3.19 At no stage during the preparation of the Core Strategy have the Council considered whether the proposed Safeguarded Sites carried forward from the Adopted Local Plan remain "sequentially" preferable. PPG 3 and PPS 3 set out criteria to be used in identifying broad locations and specific sites for housing development, focussing on the delivery of sustainable development and the need for sites to be sequentially preferable.
- 3.20 Paragraph 7.27 of the Core Strategy Submission Version acknowledges that the Council ***"will need to meet the criteria and sequential tests set out by Government guidance, before releasing these Greenfield sites"***. Notwithstanding paragraph 7.27 the Plan is considered to be unsound in that it did not assess whether the criteria and sequential tests were met before allocating the sites, as required by national planning policy.
- 3.21 It is requested that the proposed Safeguarded Sites and any potential alternative sites proposed are assessed against the criteria and sequential tests set out by national planning policy before work on the LDF is proceeded, in order to conclude whether the proposed Safeguarded Sites are the most sequentially preferable or whether an alternative site(s) should be allocated.
- 3.22 Should it be recommended that alternative Safeguarded Sites are explored it is requested that Land at Randall's Field (known as Tegg's Lane in previous representations) is assessed. A plan identifying the location of the Randall's Field site is attached at Appendix 1.
- 3.23 Burhill have commissioned initial investigations into the sustainability and suitability of the site for residential development in comparison to the proposed Safeguarded Sites. A Constraints and Opportunities Analysis of sites at Brookwood Farm, Moor Lane and Randall's Field has been carried out and is appended at Appendix 2. In summary, the report concluded that:

“there are a number of very significant constraints on the development of the allocated Safeguarded Sites, in particular that of Brookwood Farm. The site at Randall’s Field is considered to present a preferable alternative for residential or mixed use development. The site is located in a more sustainable location and is not the subject of major physical constraints. It provides an opportunity to develop a site on the edge of the existing built up area without extending the urban boundary of Woking into environmentally constrained countryside”.

- 3.24 A review of the infrastructure capacity and availability in the vicinity of Randall’s Field has been assessed, concluding that there are no apparent infrastructure, (education, water, drainage, electricity, gas or telecommunications) network or other capacity restrictions that suggest that development at Randall’s Field would not be viable.
- 3.25 To demonstrate possible disposition of uses on Randall’s Field three sketch concept masterplans have been prepared. Each masterplan includes residential development, a small employment area (B1), public open space and space for a doctor’s surgery. The masterplans and a schedule of proposed uses are attached at Appendix 3.
- 3.26 The Constraints and Opportunities Analysis, infrastructure review and sketch concept masterplans clearly demonstrate that the site at Randall’s Field is in a sustainable location and is capable of being developed with a balance of land uses to provide for approximately 260 new houses, employment development (0.9 ha) and public open space (1.6 ha). The site should therefore be considered alongside those at Brookwood Farm and Moor Lane.

4.0 SUMMARY AND CHANGES SOUGHT

4.1 Policy GB2 proposes to allocate two Safeguarded Sites for long-term residential development at Brookwood Farm and Moor Lane, both of which are currently allocated as Safeguarded Sites in the Adopted Local Plan.

4.2 The specific identification of sites in the Core Strategy goes beyond the Strategy's remit as set out in national planning policy. Furthermore, the Strategy has not assessed whether the Safeguarded Sites are sequentially preferable and has not undertaken a full sustainability appraisal of each site or considered potential alternatives.

4.3 This is contrary to Section 13 of the 2004 Planning and Compulsory Act which requires Local Planning Authorities to keep under review the matters which may be expected to affect the development of the authority's area or the planning of its development, such as the allocation of Safeguarded Sites. The Council's decision to allocate land at Brookwood Farm and Moor Lane as Safeguarded Sites without undertaking full sustainability assessments and considering potential alternatives means that the Core Strategy fails to comply with tests (iv) and (vii) of the Tests of Soundness, as set out in PPS12. The Core Strategy is therefore considered to be unsound and it is requested that:

- Options for alternative Safeguarded Sites are considered either before the LDF is proceeded or as part of the Site Allocations DPD, including a review of Green Belt boundaries where necessary to ensure that development will be genuinely sustainable;
- The sites are fully addressed in the Strategy's (or Site Allocations DPD) Sustainability Appraisal, assessing the full social, economic and environmental implications of the proposals; and
- A detailed analysis of the sites constraints and opportunities is undertaken to assess whether the proposed Safeguarded Sites are sequentially preferable, or whether alternative sites should be allocated.

4.4 As part of any review of the proposed Safeguarded Sites, as part of either the Core Strategy or Site Allocations DPD it is requested that land at Randall's Field is taken into account. The site is located to the south of the residential area of Pyrford and is within close proximity to a full range of services and facilities, including public transport,

employment, schools and shops. The site is bordered to the north, west and north east by residential development and its boundaries are very clearly defensible. Whilst the site is located in the Green Belt at present it is not constrained by any environmental designations or physical constraints. The site is therefore considered to be a sustainable and suitable location for additional residential development.