

**Proposed Changes to the South East Plan**

<b>Proposed Change Policy July 2008 (Proposed Change ref no)</b>	<b>Original Policy in Draft South East Plan (submission to Government) March 2006</b>	<b>Brief Summary of Proposed Changes to the Draft South East Plan</b>	<b>Recommended Response</b>
SP2 Chap 4 (8) (and Policy H1 Chap AOSR 1 (or 3 as shown in companion document) Chap 25 (22)		New text has been proposed for Strategic Development Areas (SDA) that includes the designation of a new SDA at Whitehill/Bordon. The Whitehill/Bordon Opportunity also has an indicative allocation of 5,500 dwellings (net) and has been given a policy on its own in the in the section on Isle of Wight and Areas outside sub-regions.	Object: The Proposed Changes should make it clearer why SDAs have been identified. Whitehill/Bordon has been identified as a SDA because it has a capacity for levels of development over 5,000 dwellings. However, the development's impact on surrounding districts has not yet been demonstrated. There are strong concerns that the development of Whitehill/Bordon could have a potential detrimental impact on Farnham, Haslemere and surrounding villages, as it could have a heavy burden on the capacity of the A325 and public transport provision and on community infrastructure and services. Although the Proposed Changes state that the housing figure is indicative, the identification of the Whitehill/Bordon as a SDA with its own policy prejudices the amount of redevelopment that is appropriate. Furthermore, unlike the other SDAs that have been identified in the South East Plan,

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			it has not been demonstrated why the development of Whitehill/Bordon is essential to the spatial strategy of the South East.
SP3 Chap 4(9)	<u>CC8a</u> Urban Focus and Urban Renaissance	Only very minor amendments to wording to recognise that some new development is planned to take place adjacent to urban areas and that Strategic Housing Land Availability Assessments have now replaced Urban Potential Studies	Object: It is agreed that new development may have to be located adjacent to settlements and it is agreed that the policy should acknowledge that this might have to be a strategic decision for LPA. However, it is for individual Core Strategies to determine this following the gathering of evidence through the SHMA and the SHLAA. The Proposed Change Policy should reflect this process in order that such a strategic decision is not prejudged.
Now SP5 Chap 4(14)	<u>CC10a</u> Green Belts	The broad extent of the Green Belt is appropriate and will be retained and supported. However, there are changes to the policy to allow for selective reviews of the Green Belt. Smaller scale local reviews are also likely to be required in other locations and these should be pursued through the LDF. Reviews should be in line with national criteria for Green Belt releases and ensure that the sufficient land is safeguarded to avoid needing a further review to meet needs to at least 2031.	Further Clarification is needed: The protection of the broad extent of the green belt is welcomed. However, the Proposed Change does not indicate what "small scale local reviews" are. If a decision is made through the Core Strategy and subsequent DPD by the LPA to release small areas of green belt land adjacent to existing settlements to meet local requirements, then can this be achieved at borough level through our LDF or will it require sub regional consideration? It is unclear why a date of 2031 has been set for the next time LPA can consider a

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			further Green Belt review when the housing targets set in the South East Plan are up to 2026. This will prejudice decisions about the location and distribution of development beyond the plan period.
CC4 Sustainable Design and Construction Chap 5(12)	<u>CC4</u>	Proposed so that the policy will apply to 'development' rather than individual buildings. Furthermore the reference to a contribution to standards of energy and water efficiency higher than required by the Building Regulations has been deleted	Partly Object: The reference to development means that the policy applies to more than just buildings, which is supported. The deletion of the reference to exceeding Building Regulations reflects the Government's programme to increase Building Regulations to zero carbon standards by 2016 (domestic) and 2019 (commercial). However, there is no reason why standards above the Building Regulations should not be sought now.
CC7 Infrastructure and Implementation Chap 5 (21)	<u>CC5</u>	Proposed Change to policy states that the scale and pace of development will depend on there being enough capacity being available in existing infrastructure to meet the needs of new development. Text relating to "sufficient capacity in existing infrastructure to meet the area's current needs" has been deleted. Where it can not be shown that there is not enough capacity is available in existing infrastructure to meet the needs of new development the scale and pace of development will depend upon additional	Object: The Secretary of State has moved away from the conditional approach where growth only takes place where infrastructure has already been put in place. She now proposes a "Manage and Invest" approach where existing infrastructure should be managed to meet the needs of future growth before new infrastructure is provided. This approach relies heavily on better management of infrastructure or a change in demand for its use. Although this is

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		<p>capacity being release through</p> <ul style="list-style-type: none"> <li>• Demand management;</li> <li>• Better management of existing infrastructure; or,</li> <li>• new infrastructure, which if needed a programme of delivery should be agreed before development begins.</li> </ul>	<p>considered a more sustainable approach, there is no evidence that behaviour and attitudes can be changed to reduce the demand for infrastructure. The provision of infrastructure under this approach could therefore be insufficient to meet proposed new development. The reference to delivery programmes is supported.</p>
Deleted Chap 5(31)	<u>CC10b</u> Strategic Gaps	<p>Policy deleted. It is felt by the Government that the options for strategically reviewing the Green Belt along with the requirements of PPS7 are enough to deal with development issues in the open countryside without having further local restrictive designations.</p>	<p>Object: Strategic gaps apply to areas of countryside that are vulnerable to pressure for development because they lie between built up areas. They are a powerful tool in shaping the character and setting of urban areas and preserving the countryside for recreational and landscape purposes where it is outside the Green Belt. It would be difficult to continue protecting gaps between settlements through local landscape designations where they lie across sub regional and county boundaries.</p>
H1 Regional Housing Provision Chap 7 (2)		<p>Regional Housing Provision has been increased from an average of 28,904 dwellings to 33,125 dwellings per annum. Waverley's figure has been increased from 4600 to a minimum of 5000 dwellings in the period 2006 to 2026 (an increase from an average of 230 dwellings to 250 dwellings per</p>	<p>Strongly Object: Together with the absence of mechanisms such as phasing policies and windfall allowances to manage housing growth, the treatment of housing targets as a minimum will seriously undermine the Council's ability to manage its housing land supply and</p>

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		<p>annum).</p>	<p>deliver sustainable development. This is because:</p> <ul style="list-style-type: none"> <li>• A minimum target means that the housing target to plan for is uncertain and it will be difficult to prepare Development Plan Documents to meet it.</li> <li>• If extra homes that are delivered in some years do not count towards the overall long term housing target, Waverley may significantly exceed its housing requirement. The surplus will not have been tested through the plan making process.</li> <li>• Sustainability Appraisal will be undermined if this approach results in a different amount of new homes in different locations than intended.</li> <li>• It will be difficult to consider what infrastructure will be needed to support any additional development planned for and what the impact will be on greenfield sites.</li> <li>• Together with the “Manage and Invest” approach to infrastructure, it will put additional strain on the capacity of infrastructure to meet needs</li> <li>• It will be difficult to allocate funding</li> </ul>
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			for affordable housing.
H2 Managing the Delivery of the Regional Housing Provision Chap 7 (6)	<u>New Policy</u>	<p>The new policy states that Local Authorities are required to work in partnership to deliver both the district housing provision, the sub regional area's or the rest of the county area's housing provision. The issues they need to take into account include:</p> <ul style="list-style-type: none"> <li>• The Need to test the longer term issues that arise from eco town and growth point proposals through the next review of the RSS</li> <li>• Scope to identify additional sources of supply including a sufficient quantity and mix of housing including rural affordable housing.</li> <li>• Meeting any backlog of unmet need</li> </ul>	<p>Object: The requirement for LPA to take a more proactive approach to strategic housing delivery is onerous given the requirement already to carry out evidence for DPD, such as the SHLAA and SHMA, and particularly because this is a role for a review of the SE Plan. It is considered unacceptable that LPA should manage delivery to achieve both the borough's provision and the sub regional/rest of county provision. Waverley is the only borough in the Rest of Surrey Area and it is not in a sub region. Therefore it is not affected by this policy requirement. However, it seems unfair and contrary to strategic planning principles to expect LPA to provide additional housing to make up for any under provision that neighbouring Councils have. It is agreed that the longer-term issues that arise from the eco town proposals should be tested in terms of impact on adjoining Councils. However, testing the impact at the next review of the RSS may be too late and there needs to be guidance on how the impact of eco towns can be tested. In terms of Bordon/ Whitehill the difficulty comes</p>

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			because the adjoining LPA, Waverley, lies outside the sub region/housing market area that it lies within.
Deleted Chap 7(10)	<u>H3</u> Location of Housing	Policy deleted because it was felt that it is already covered in other policies of the SE Plan. Reference to the need for providing enough housing at the right mix including affordable housing in rural areas is added to the new Policy H2 of the Proposed Changes.	Support: However, due to the importance of providing rural affordable housing, this Proposed Change is only supported if the text relating to this issue is kept in the new policy H2: Managing the Delivery of the Regional Housing Provision.
H3 Affordable Housing Chap 7 (11)	<u>H4</u> Affordable Housing	The policy now includes a reference that there can be locally set site size thresholds.	Support: Depending on the evidence from the SHMA and the Affordable Housing Financial Viability Study, there may be an option to meet housing needs to lower the site size thresholds lower than the Government's advice in PPS3 of 15 dwellings.
H4 Type and Size of Housing Chap 7(12)	<u>H6</u>	Wording changed to reflect the advice in PPS3 on housing mix and type and to remove a reference to joint working in the preparation of SHMA.	Object: Waverley is presently undertaking a SHMA jointly with other adjoining authorities. It is a necessity to have joint working and advised in PPS3. The removal of the wording on it must be an error given that it is referred to in the reasoned justification for the Proposed Change.
H5 Housing Design and Density	<u>H5</u> Housing Density and Design	Policy title changed and wording reordered to emphasise the need to seek high quality design and sustainability.	Support: The Proposed Change emphasises the importance that development at higher

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Chap 7(22)			densities must not be considered in isolation but meet high standards of design. This accords with PPS3: Housing.
T4 Parking Chap 8(19)	<u>T7</u> Parking	No change (except for a reference to PPS3: Housing, rather than PPG3).	
T5 Travel Plans and advice Chap 8 (21)	<u>T8</u> Travel Plans and Advice	Removal of the requirement that all major travel generating developments must have a travel plan agreed and implemented by 2011. The reasoned justification of the removal of this sentence is that the Government does not have any policy or targets for major travel developments to have travel plans and therefore would be difficult to enforce and monitor.	Object: It is considered that Travel Plans for all major developments are an important approach to achieving sustainable transport and enforcement of their implementation should be encouraged.
NRM5 Conservation and Improvement of Diversity Chap 9 (19)	<u>NRM4</u> Conservation and Improvement of Diversity	Proposed Change to: <ul style="list-style-type: none"> <li>• distinguish between internationally designated sites and nationally designated sites</li> <li>• avoid damage to areas outside Natura 2000 sites where these support the species for which the site as protected</li> <li>• add a reference to connecting sites as an opportunity to improve biodiversity</li> </ul>	Object: The Proposed Changes are generally accepted. However, it is not considered necessary to have a Thames Basins Heath type approach for all SPAs, SACs or Ramsar sites.
NRM6 Thames Basin Heaths Special Protection Area Chap 9 (23)		This is a new policy that applies the principles of Delivery Framework for the Thames Basin Heaths.	Support: This puts the principles of the Thames Basin Heaths Delivery Framework into the South East Plan and will give it more weight.



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<p>NRM11 Development Design for Energy Efficiency and Renewable Energy Chap 9 (40)</p>	<p><u>EN1</u> Development Design for Energy Efficiency and Renewable Energy</p>	<p>Policy amended to remove overlap with Policy CC4 and updated in line with the supplement to PPS1 (Planning and Climate Change). Also amended to state that in advance of local targets being set in DPD, new developments of more than 10 dwellings or 1000 sq m of non residential should secure at least 10% of their energy from decentralised and renewable or low-carbon sources.</p>	<p>Support in principle but express concern: Whilst there is support for the rationale of the policy, there is concern that the interim thresholds proposed would represent a retrograde step on what we presently apply under Policy SE2 of the Surrey Structure Plan. This policy states, “commercial and residential development should be designed such that a minimum of 10% of the energy requirement is provided by renewable resources”. The proposed new thresholds will therefore have a significant impact on the amount of energy/carbon saved as it will only apply to larger schemes and not all commercial and residential developments. However, the Proposed Change states that the target is only set out until LPA set their own targets in the DPD. This is an improvement to the draft South East Plan where the need to set local targets was not even mentioned. PPS1 expects that target based policies in the RSS should have a sound evidence base. There is a lack of evidence at the regional level, and the policy would compromise the soundness of any local policy that was based on the regional target. The reference to requiring locally set targets is therefore essential.</p>
<p>C3 AONB</p>	<p><u>C2</u> AONB</p>	<p>Proposed Change is the replacement of the words “Priority should be given to</p>	<p>Support: The Proposed Change is welcomed</p>

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Chap 11 (9)		conservation and enhancement of natural beauty...” with the words “High priority will be given to conservation and enhancement of natural beauty...”	because it strengthens the aim of the policy.
BE2 Suburban Intensification Chap 12(7)	<u>BE2</u> Urban and Suburban Intensification	The change to the title reflects the policy focus towards mainly residential neighbourhoods to allow a more logical hierarchy to the policies in the Management of the Built Environment Chapter. The Proposed Change identifies locations where intensification could meet planning objectives.	Support: The Proposed Changes are welcomed in that the ways the policy objectives can be met are clearer, logical and in line with PPS3: Housing.
BE4 The role of Small Rural Towns (‘Market’ Towns) Chap 12(2)	<u>BE5</u> The role of Small Rural Towns (‘Market’ Towns)	Proposed Change so that one of the objectives now refers to the provision of “sufficient housing development to meet “identified needs” rather than to the provision of “small scale housing development”. Also the supporting text has been changed so that small rural towns should take into account the size and function of the town, but that towns will generally be up to 20,000 population (rather than between 3,000 and 10,000)	Support: The Proposed Changes allows greater scope for providing housing development in sustainable locations in market towns to meet identified needs than the Policy in the draft SE Plan. The definition of size up to 20,000 is also welcomed given that the draft SE Plans definition of 3,000 to 10,000 would exclude Farnham, Godalming and Haslemere from the Policy. The new definition would still exclude Farnham so it is important that the words that “LPAs should take into account the of the function and size of the town”
BE5 Village Management Chap 12 (17)	<u>BE6</u>	Minor Change to Policy. Wording reordered to put emphasis on meeting defined local needs from the amount of development	Support: The change in emphasis to meeting defined local needs will help protect the character and role of individual villages.

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<p>TC1 Strategic Network of Town Centres Chap 13(13)</p>	<p><u>TC2</u> Strategic Network of Town Centres</p>	<p>Farnham has been removed from the list of Secondary Regional Centres (SRC) in line with the recommendation in the Panel Report. The Panel agreed with the concerns of the County Council about the impact of further growth on the historic market town. However, the Panel did have reservations about this given Farnham was ranked within the top 50 centres on the DTZ measure and all sensitivity rankings. The Panel Report remarked that any proposed development within the centre would have to take account of its setting and character, regardless of its classification as a SRC.</p>	<p>Support: It is agreed that development in Farnham should respect its historic character. Deletion from this list however, will not stop any new development taking place as it can be achieved through the spatial strategy under Policy TC2, New Development and Redevelopment in Town Centres.</p>
<p>TC2 New Development and Redevelopment in Town Centres Chap 13 (23)</p>	<p><u>TC3</u> New Development and Redevelopment in Town Centres</p>	<p>New wording is proposed. It sets out the considerations that LPA should be guided by when they are preparing their DPD on the amount of growth needed in town centres. It states LPAs should carry out further work to assess the need for further floorspace in town centres and set out a vision and strategy for the network and hierarchy within their area. This work should include other centres not listed in the TC1 as these centres may have an important role in meeting local needs.</p>	<p>Support: The wording recognises that other centres not listed in Policy TC1: Strategic Networks of Town Centres, may require development or redevelopment. Given that Farnham has been removed from Policy TC1 this new wording enables the redevelopment of East Street.</p>