

# DRAFT

## ANNEXE 1

### **SUMMARY OF RESPONSES TO THE TOPIC PAPER CONSULTATION REGARDING THE AMOUNT AND LOCATION OF NEW HOUSING**

#### **Introduction**

The issue of the amount and location of new housing was considered as part of the consultation on the Topic Papers for the Core Strategy, which took place between February and April 2009. The **Town and Country** Topic Paper included questions regarding:

- **TC1: How many new homes should we plan for?**
- **TC2: Where should new homes be built?**
- **TC3: Should the Council include an allowance for “windfall sites” in its overall housing strategy?**
- **TC4: In principle, should the Council seek to control the amount of unplanned housing that comes forward?**

#### **Responses to the Consultation**

Comments were made by individuals and organisations (that include the CPRE, amenity groups and residents’ associations) and developers/agents/landowners. In terms of specific consultees, those responding included: SEERA, SEEDA, Environment Agency, Natural England, English Heritage, Surrey County Council, Southern Water, Thames Water and the Highways Agency.

In total there were 149 respondents to the Topic Paper consultation. Responses mainly came in the form of choosing set answers to specific questions set out in the Council’s questionnaires on the Topic Papers. However, some respondents also chose to set out written comments to the Topic Papers in addition to or instead of the set answers given in the questionnaires.

Whilst the feedback from the consultation is valuable, the statistical analysis of the consultation responses to the questionnaires and the written comments needs to be put in context. Taking account of the overall number of responses and that the responses came from a mix of individuals and organisations, they do not comprise a wholly representative cross-section of the population or the other organisations and individuals who have an interest in Waverley.

The responses and written comments to the above questions include responses to the Council’s Topic Paper on the Draft Spatial Portrait, Spatial Vision, Core Objectives and Strategy Issues where it was considered that they have implications for the strategy for developing new housing. Summaries of the comments are set out below.

# DRAFT

## **Issue TC1 - How many new homes should we plan for**

On the question of how many homes to plan for, there were 100 respondents, comprising developers, organisations and individuals. 69% of respondents felt that the Council should be planning to deliver only the 5000 homes rather than more, with 31% favouring the option of actively planning to deliver more than 5000 new homes.

Specific written comments on this issue were also split between the two options. On the one hand there were comments that the figure of 5000 is significantly above that which the draft South East Plan thought sustainable. Waverley is a rural borough that is not designated for growth in the South East Plan. It is covered in places by constraints including the Surrey Hills AONB, Green Belt and SPA, SAC. Therefore, it will be difficult not have an impact on the environment and infrastructure if it is to meet the 5000 as a minimum figure. It was pointed out that the South East Plan encourages local authorities to consider higher allocations, rather than 'does not prevent' as stated in the Topic Paper – the emphasis is wrong.

On the other hand it was argued that the housing target in South East Plan is a minimum target as it is not a matter of just meeting housing numbers. The Council must aim to meet housing need as it is desperately needed to meet general affordable housing needs as well meeting the needs of specific groups, such as the elderly and students. This may mean allocating sites solely or mainly for affordable housing. Household projections, housing growth aspirations and current economic conditions could also mean planning for more than 5000 homes and looking beyond 2026. A point also raised was that the Council should not only plan for but also commit itself to the delivery of 5,000 new homes.

Some of the comments made it clear that the evidence base will inform the Council whether they should plan for more houses than that required in the South East Plan and whether the numbers are deliverable. Environmental issues such as the provision of infrastructure such as drainage, sewage, and flood risk management also need to be considered.

## **Issue TC2 - Where should new homes be built?**

There was a mixed response on the options about where development should be located. The following sets out the results from the questionnaires and some of the comments relating to where housing should go.

### **Option TC2A**

**Development within towns and villages. Effectively a continuation of the Council's current policy and would limit most new housing development to locations within the current settlement boundaries in the Local Plan. These comprise Farnham, Godalming, Haslemere and Cranleigh and all the villages identified under RD1.**

## DRAFT

22% of respondents to the questionnaires preferred the option of containing development to sites within settlements.

It was considered by some respondents that this approach would be the most sustainable location for new development with best access to infrastructure, services, transport and employment, in line with the South East Plan and the Regional Economic Strategy. The Core Strategy should make better use of urban housing stock to promote urban renaissance. Developing within the towns and villages should be used to create locally distinctive places. Affordable housing is best delivered within existing settlements where services and facilities are available.

In the opinion of some, development outside settlements will have a negative impact on the environment and the open countryside. It could lead to urban sprawl; it would be less sustainable and would render settlement boundaries meaningless.

It was suggested that the identification of sites in the main towns should be based on a sequential approach with town centre sites considered first, followed by edge of centre sites and out of centre sites. For others, previously developed sites should be considered first. However, it was suggested that the location of development on brownfield sites within settlements would also need to take into account biodiversity and environmental interests.

There was the comment that the evidence base would inform the selection process for choosing sites. Development on brownfield sites could also have implications for flooding given that town centres are usually based around rivers, and pollution. The opportunity should be taken to undertake remediation measures.

### **Option TC2B**

**Development within towns and villages together with some of the required new housing provided on identified sites on the edge of the towns and larger villages**

The option of having development within towns and villages, together with some new housing being on identified sites on the edge of the towns and larger villages, received the highest response (33% of the 81 respondents)

This option was considered preferable by some respondents because, like Option TC2A, it was sustainable in directing development to where access to facilities, services, transport and infrastructure is the greatest.

Such an approach, it was argued, should sequentially consider brownfield sites on the edge or close to the towns and larger villages first. However there was also a view that relying just on brownfield land would undermine an approach that seeks to meet housing needs and balances housing and employment growth.

## **DRAFT**

It was commented that undertaking green field releases and smaller scale local reviews of Green Belt boundaries is acceptable under the South East Plan. If development takes place on green field sites then certain mitigations in relation to biodiversity and conservation should be undertaken.

### **Option TC2C**

**Development within Towns and Villages, with some of the required new housing being provide on the edge of towns and villages generally irrespective of their size**

The option of locating development within towns and villages, with some new development on the edge of towns and villages generally was favoured by 12% of respondents to the questionnaires.

The written comments show there is support for development in rural areas because it will increase the sustainability of village schools and other education facilities as well as meeting local housing needs. It was also considered that a pragmatic view should be taken about the reliance on private cars in rural areas. A balance must be struck to avoid refusing very worthy applications purely on the grounds that they fail to meet unrealistic sustainable transport aspirations.

This approach was also attractive to some respondents because they felt that development within the towns and villages and outside the larger towns and larger villages would overload these settlements. However, spreading development to the edge of towns and villages irrespective of size must be on carefully selected sites.

### **Option TC2D**

**Development within towns and villages, together with some of the required new housing being provided in a new settlement or a single urban extension.**

The option of having development within the towns and villages, together with some new housing being provided in a new settlement or a single major urban extension was the second highest favoured option with 32% of respondents to the questionnaire preferring it.

Written comments include one that stated that any urban extensions should be limited to the four main settlements. Extensions to other settlements should be limited to “exception” sites solely for affordable housing to meet local needs.

One view was that any attempt to build a large urban extension would seriously undermine the existing character of the Borough. Another was that a single large extension would not be able to respond to the wider social and economic needs of the borough and towns, as it would leave other towns and the larger villages with little scope to meet their needs. It would result in a

## DRAFT

substantially larger single centre and place considerable pressure on the infrastructure of a single settlement.

There was a mixed opinion on a new settlement. On the one hand it was considered that the location of development is incorrectly being driven by the proposed settlement hierarchy that relies entirely on the current pattern of accessibility to services, jobs and public transport and not on other aspects of reducing climate change. The provision of a new settlement could achieve this. However, it is important to be clear about where the location of a new settlement should be otherwise this option would be meaningless. It is also not clear whether the other options are realistic in achieving the amount of development needed and what impact they would have on issues such as congestion, infrastructure and environmental and planning constraints.

Other respondents took a different view commenting that it is unlikely that there will be a suitable location for a single new settlement in Waverley, as confirmed by the South East Plan (Proposed Changes). A new settlement will not be able to meet the employment, shops and service needs of the new community compared to existing or new provision in an existing settlement. New homes and the provision of new facilities/service in a new settlement could be detrimental to the viability of existing settlements.

### **General considerations for the location of development**

Written comments also included a number of issues that the Council need to consider when deciding where major housing development should take place. These include protecting landscapes, habitats, sites, species and floodplains and promote sustainable transport patterns. Development should deliver significant benefits for natural environment including climate change mitigation and adaptation measures as well as provision for access and recreation and minimise impact on neighbouring uses.

It is important to identify the very different characteristics of each of the Borough's settlements including parking/traffic issues. Development should fit sensitively into its surroundings, and where "low density" areas are designated in the Local Plan these should be retained. Development should create high quality locally distinctive places.

The economic situation also needs to be taken into account. Locations will need to consider the implication of the financial downturn on the housing market and development viability.

Where development is needed inside settlements then this could be achieved by moving under utilised recreational space and allotments that are presently located inside settlements to undeveloped land outside settlements. The land inside settlements left vacant could then be developed. Such land swaps would allow the Council to achieve improvements in recreational and other facilities without prejudicing existing planning policies.

## DRAFT

Other issues raised include taking into account cross boundary issues, such as the impact of developing Whitehill/Bordon in East Hampshire and its impact on the Waverley's infrastructure and facilities.

Development should help deliver a balance of housing and employment in the most sustainable locations to meet housing needs and help provide appropriate accommodation for existing and new businesses.

In general terms it was pointed out that it is quicker to deliver infrastructure on a small number of clearly defined large sites than it is to deliver on a large number of small sites that may not be clearly defined.

There was concern about the Council's approach regarding the Thames Basin Heaths SPA. The view was expressed that the Council and Government have promoted unlimited development around the SPA without the required Waddenzee 'convincing evidence' for justification. The comment was also made that the Core Strategy cannot predetermine the review of the mini-plan and that the draft South East Plan states an acceptance that development in Waverley can be accommodated outside the Thames Basin Heaths SPA Zone of Influence.

It was also commented that the Core Strategy does not mention any potential Major Developed Sites within the Green Belt. The Core Strategy cannot be delivered without their consideration. Major Developed Sites have particular significance and should not be placed by omission in the category of a windfall site.

### **Specific Areas for Development**

Responses by landowners/developers promoted a number of different sites and settlements across the Borough where housing should go for a number of reasons. Similarly a number of areas and settlements have been suggested where development should not take place because of constraints.

### **Issue TC3 - Should the Council include an allowance for windfall sites in its overall housing strategy?**

The view on allowing windfalls was mixed, with 51% of the 79 respondents to the questionnaires saying that there should be no allowance for windfalls in the first 10 years of the strategy and 49% taking the opposite view.

There was a clear view from some that there is no evidence to support windfalls and therefore should not be included in the first ten years of the Core Strategy because.

Some respondents' case against windfalls was that they do not provide certainty and it will be difficult for infrastructure and service providers to plan investment. In terms of flooding, windfalls will not allow for sites to be identified and cannot be sequentially tested through the Strategic Flood Risk

## DRAFT

Assessment. It also places pressure on lower value land values and the consequent loss of other uses to other uses.

Another reason for not having a windfall allowance is that they can involve the subdivision of existing dwelling houses and their gardens. This has a detrimental impact on the character of the area that the site lies within, wildlife, and can result in run off and flooding caused by an increase in the built form. For some, windfalls should only be used to exceed the minimum housing targets set out in the South East Plan

On the other hand, some respondents felt that Waverley could justify a windfall allowance. It is a rural Borough. Historically this is the process that has delivered the greater proportion of new housing in the Borough and there is no reason why this would not continue. Without windfalls there will be pressure to deliver housing sites on green field sites.

Some respondents felt that windfalls could support wider development and housing goals to meet housing needs and help form part of the five year housing supply.

One respondent also linked the issue of windfalls to the SPA issue in Farnham. The comment was that there should not be an allowance for windfalls in the first ten years. If Waverley cannot identify specific sites in Farnham for the first ten years then there is no need for a mini plan.

### **Issue TC4 – In principle should the Council seek to control the amount of unplanned housing that comes forward?**

There was a mix of views on this issue. In terms of answers to the questionnaires, 68% of the 75 respondents favoured the option of having a policy to control the release of unplanned windfall sites in circumstances where it could be demonstrated that the required amount of housing can be delivered without reliance on these sites.

The other 32% responses to the questionnaires favoured the option of not having a policy to control the release of windfall sites. Respondents felt that the approach should not stop windfall sites that are appropriate for development.

### **Question TC5- What types of windfall development should the Council seek to control and why?**

In response to the supplementary question in the questionnaire and written comments the following are the types of windfall sites that respondents have suggested should be controlled.

Development that:

- Results in the subdivision of garden land as it ruins the character of an area (the most frequent comment). Gardens are important not only for

## DRAFT

environmental reasons but also because it has a detrimental impact on the local character of communities.

- Results in overcrowding and pressure on the road system and infrastructure.
- Detrimently affects protected low-density areas. The density should not be increased by in filling.
- Tries to avoid a mix of housing.
- Does not give 'certainty' to the public and developers. Windfalls are not a plan.
- Is poorly designed and eco unfriendly.
- Does not allow infrastructure providers to plan investment.
- Results in the loss of land or buildings that are valuable to the community.
- Reduces the provision of affordable housing.
- Does not support the housing strategy.
- Is in the floodplain and in areas that have drainage restrictions.
- That allows for protection of infrastructure, which includes foul and surface water sewers.
- Complies with a phasing of development strategy.
- Is not appropriate for the size of the settlement it is linked to and its existing infrastructure and facilities.

Tandridge District Council has a policy where windfalls of over 5 units or above (or 0.2 ha) are controlled where the Council's rolling 5-year housing supply figure is exceeded by more than 20%. Some respondents felt that Waverley could have a similar approach.

On comment stated that there should not be an assumption that all windfall sites automatically are entitled to development.