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## ANNEXE 2

### WAVERLEY BOROUGH COUNCIL LOCAL DEVELOPMENT FRAMEWORK

### CONSULTATION ON HOUSING OPTIONS FOR THE CORE STRATEGY

#### INTRODUCTION

Waverley Borough Council is producing its Local Development Framework (LDF), which will set out the planning policies that will be used to guide and manage new development in the coming years. The LDF will contain a number of documents which, over time, will replace the existing planning policies that are in the Waverley Borough Local Plan.

The most important document in the LDF will be the Core Strategy. As the name suggests, the Core Strategy will set out the overall planning framework for Waverley and the key policies needed to deliver this strategy. One of the main issues that the Core Strategy will have to address is the Council's approach to delivering the amount of new housing that is required in Waverley in the period up to 2026.

The purpose of this consultation is to seek the views of the local community and other key stakeholders on some options for delivering this housing. This will build on previous consultations when the Council has invited views on this important subject. In February 2009, the Council consulted on Topic Papers, which set out issues and options for the Core Strategy. One of the Topic Papers included questions regarding the amount of new housing the Council should plan for, and the location of housing.

This consultation differs from the earlier consultations, because the options have been worked-up in more detail and because there is more supporting evidence available to help to explain the context and potential implications of these options.

It should be pointed out that the purpose of this consultation is to look at further options for the location of housing generally. It will also be necessary, in due course, to consider issues of housing need, for example the need for affordable housing and the need for housing for specific groups, for example in response to the age profile of the local population.

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## HOW MANY NEW HOMES MUST THE COUNCIL PLAN FOR?

In May 2009 the Government published the South East Plan. This identifies the amount of new housing required in the South East region and allocates this across all the relevant local authorities. The South East Plan requires that local authorities across the South East allocate sufficient land and facilitate the delivery of a total of **654,000** net additional dwellings between 2006 and 2026. Waverley's contribution to this is to provide for at least **5,000** net new dwellings in that 20-year period, (an average of **250** dwellings per annum.)

## NATIONAL AND REGIONAL PLANNING POLICY

The policies in the Council's LDF, including the Core Strategy, must comply with National planning policies and must be in conformity with the policies in the South East Plan.

### National Planning Policy

The Government's main planning policy document dealing with housing matters is Planning Policy Statement (PPS) 3 – "Housing". Attached as **Appendix 1** is a summary of the main issues in PPS3 that have a bearing on the location of housing.

One of the key messages in PPS3 is that the Council must be more pro-active in its approach to the provision of new housing. This means being less reliant on "windfall sites". These are sites that have not previously been identified/allocated for housing by the Council. In the past, a very large proportion of new houses built in Waverley have been on windfall sites.

According to PPS3, the Government's objective is to ensure that the planning system delivers a flexible, responsive supply of land. This means setting out the strategy for delivering new housing, including identifying broad locations and specific sites, to enable a continuous delivery of housing for at least 15 years from adoption of the Core Strategy. As the anticipated date for adoption of the Core Strategy is 2011, this means having a strategy to deliver housing up to 2026.

There is a particular focus on identifying enough specific **deliverable** sites to provide housing for the first 5-years.

In terms of the location of housing, the preference is to build in locations that offer a range of community facilities and have good access to jobs, key services and infrastructure. There is also a preference for making effective use of land by re-using previously developed land (PDL). PPS3 refers to the national target that at least 60% of new housing should be on PDL.

Other Government guidance/policy relevant to the broad location of new housing include PPS1, PPS7 and PPG13.

### The South East Plan 2009

The South East Plan does more than just setting out the housing allocations for each local authority. There are many other policies that will have a

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bearing on decisions about where new housing should go. Attached as **Appendix 2** is a summary of the main South East Plan policies that are relevant to the location of housing.

Policy SP3 relates to urban focus and urban renaissance. It states that the prime focus for development in the south east should be urban areas, in order to foster accessibility to employment, housing, retail and other services, and avoid unnecessary travel. It states that local authorities should formulate policies to concentrate development within or adjacent to the region's urban areas, with a regional target of at least 60% of new development being on PDL.

## **THE SURREY SUSTAINABLE COMMUNITY STRATEGY**

The draft Surrey Sustainable Community Strategy (SSCS) was published for consultation between November 2008 and February 2009. It is a plan for achieving a better Surrey, as set out in the Vision for Surrey in 2020. Where relevant, it is important for the LDF Core Strategy takes account of priorities identified in the Community Strategy.

The SSCS identifies 10 priorities, to be addressed through five thematic partnerships. The priorities most relevant to the issue of housing supply are:

- Improve the global competitiveness of Surrey's economy through sustainable growth;
- Make Surrey's economy more inclusive;
- Help people in Surrey to achieve more sustainable lifestyles;
- Create better, more sustainable developments that deliver more social, environmental and economic benefit.

In relation to the economy, the SSCS refers to the high house prices in Surrey and the need to provide more affordable homes for key workers, lower earners, young people and migrant workers.

One of the Thematic Groups deals with Housing, Infrastructure and Environment. It envisages a Surrey in which housing is affordable, built in sustainable communities with supporting infrastructure. It also refers to facilities being within easy access to reduce car-use and travel options being better organised, helping Surrey to achieve a low carbon society.

The Group recognises that the challenge is to provide the level of development necessary to meet people's needs and sustain a successful economy while preserving Surrey's character and natural environment.

## **HOUSING SUPPLY IN WAVERLEY**

As explained above, the majority of new housing in Waverley has traditionally come forward on windfall sites. It has also been the case that the Council has managed to consistently meet its annual housing requirement through development within settlements, without the need to identify and release

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greenfield sites. In fact, over the first three years of the South East Plan period (2006-2009), annual completion rates in Waverley averaged 341 dwellings, exceeding the 250 per annum required by the South East Plan.

Notwithstanding this, PPS3 requires a new approach which is less reliant on windfall sites. In previous housing projections, the Council would have made an assessment of likely future supply based on past performance. This “windfall allowance” would have been included in the Council’s projections for future housing supply.

Since the introduction of PPS3, there have been other LDF Core Strategy Examinations where the role of windfall sites has been considered. The Planning Inspectorate has also considered this issue in the document “*Local Development Frameworks (Examining Development Plan Documents: Learning from Experience)*” September 2009. Evidence from these suggest that it may be difficult to justify an allowance for windfall sites in the first 10 years of the 15-year period. Even in the period from years 11-15, it is expected that local authorities wishing to include an allowance for windfalls will have to have good reasons for doing so.

## **THE STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT (SHLAA)**

An important piece of evidence relating to housing supply is the Strategic Housing Land Availability Assessment (SHLAA). The SHLAA was produced by Baker Associates on behalf of the Council. It was carried out in two phases. The first phase sought to identify potential sites within existing settlements. The threshold was to seek to identify sites capable of accommodating six or more additional dwellings.

The second phase was to examine the potential for greenfield releases around the four main settlements of Farnham (including Badshot Lea), Godalming, Haslemere (including Beacon Hill and Hindhead) and Cranleigh, together with the five next largest villages, namely, Bramley, Chiddingfold, Elstead, Milford and Witley. This second phase also involved looking at some specific brownfield sites in rural locations: (Dunsfold Park, the Weyburn Engineering and Tanshire Holdings sites outside Elstead, Milford Hospital and the Shackleford Mushroom Farm).

The SHLAA is not a static document. The Council is already working on an update to the SHLAA to ensure that the evidence on housing supply is as up-to-date as possible when the Core Strategy is finalised.

## **THE CURRENT HOUSING SUPPLY POSITION IN WAVERLEY**

In terms of meeting the housing requirement for the South East Plan Period of 2006 to 2026, the following initial sources of supply have be considered:-

- Houses already completed in the period 2006 to date;

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- Unimplemented or partially implemented planning permissions;
- Sites where there is a resolution to grant permission;
- Sites already identified in the Waverley Borough Local Plan that are considered to have development potential, (such as Milford Hospital, the town centre key sites and the land at Bourne Mill)

In addition, the SHLAA identifies specific sites within settlements that are considered to have potential to deliver housing.

The approach to meeting the South East Plan housing target has been to start by identifying sources of new housing within the settlements. The options on which the Council will be consulting all have one thing in common. They all presuppose that a proportion of new development will continue to take place within the four main settlements (Farnham, Godalming, Haslemere and Cranleigh), reflecting the broad thrust of national and regional policy. Therefore, the five options that form the basis of this further consultation are all about how to deal with the additional housing that is required over and above what can be provided within the main settlements. An added factor will be what allowance, if any, the Council makes for windfall sites.

Two other factors will need to be considered:-

- The SHLAA is not a static document. The published SHLAA is based, in part, on data from 2007 and 2008. The Council is already going through the process of updating the SHLAA. This is particularly with a view to identifying any further opportunities for development within settlements. Clearly if further suitable sites are identified, then this will have the effect of reducing any shortfall. One aspect of this consultation will be an opportunity for landowners, developers etc. to identify any additional sites that should be considered as part of the update to the SHLAA.
- Even though the Council has limited scope to identify a windfall allowance in advance, these sites will still come forward. The Council will continue to monitor the amount of new housing that is built on windfall sites. Their contribution towards housing supply will potentially reduce the residual housing requirement to 2026. In turn, this may reduce the amount of greenfield land needed to deliver the required amount of new housing. There will need to be a mechanism to phase/control the release of sites, particularly potential greenfield sites, taking account of the year-on-year monitoring of housing completions and new permissions, set against the overall target.

The housing supply position in Waverley as at April 2009 was as follows:

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Source	Number of dwellings	Comments
Completions 2006-09	1026	
Outstanding planning permissions	623	
Sites where there is a resolution to grant permission	257	This includes the East Street scheme
Sites within settlements identified in the SHLAA as having potential for housing	<b><i>To be inserted once the SHLAA is finalised</i></b>	
Other identified sites	120	This is Milford Hospital
TOTAL	<b><i>To be inserted once the SHLAA is finalised</i></b>	

***This table will identify the potential shortfall from the South East Plan housing requirement, based on figures in the SHLAA once it is finalised.***

As explained above, there may be scope to include a windfall allowance, particularly in the final 5 years of the 15 year period. The Council will keep this under review as the Core Strategy is developed and as this issue continues to be clarified through LDF examinations and other sources. As it stands, however, it is considered that there may be a reasonable case to make some allowance for windfalls after the first 10 years of the plan period. The justification for this would be:-

- Given the character of Waverley, it is difficult to identify specific sites within the built-up area in advance.
- Notwithstanding this, delivery of these sites continues to be high as evidenced by past completion rates. For example, between 2001 and 2009, completions on small sites (1-9 dwellings net) represented 38% of total completions in Waverley, with an average of 102 completions on these small sites each year;
- The current SHLAA has not identified any specific sites within settlements that are likely to deliver housing in years 11-15. However, it is unrealistic to suggest that no sites within settlements will come forward in that period.

### OTHER SOURCES OF EVIDENCE

As part of the development of the LDF Core Strategy, a number of evidence documents have been produced. Those of particular relevance to the housing options are:

- The Draft Settlement Hierarchy
- The Strategic Housing Market Assessment (SHMA)
- The Draft Employment Land Review (ELR)

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The Settlement Hierarchy places the settlements in Waverley in different categories based on the range of services available. The Hierarchy gives a measure of the sustainability of each settlement and provides valuable evidence that will support the assessment of where new housing should be directed. The latest version of the Draft Settlement Hierarchy is available to view as supporting evidence for this consultation. ....***web link to Settlement Hierarchy document***

The Council has also published a Strategic Housing Market Assessment (SHMA), which was commissioned jointly with Guildford and Woking Borough Councils, and an Employment Land Review (ELR). Both of these documents are available to view and download on the Council's web site. ...***web link to SHMA and ELR*** The ELR considers both the current supply of employment land in Waverley and provides an assessment of likely demand for employment land over the plan period. A summary of the key findings from the SHMA is attached as **Appendix 3**.

In addition to these, the Council is working on further evidence documents that will inform final choices about the preferred location of new housing, as follows:-

Strategic Flood Risk Assessment (SFRA) - The Council already has information identifying the areas at highest risk from river flooding. However, the Council has also commissioned consultants to carry out a Strategic Flood Risk Assessment (SFRA), which will provide information on the risks of all forms of flooding. This document will influence final choices about broad locations and specific sites for future housing. It is currently anticipated that the SFRA will be completed by the end of January 2010.

Transport Assessment - Discussions are already taking place with Surrey County Council and the Highways Agency regarding the transportation implications of the Core Strategy and, in particular, the implications in terms of the location of housing. This is an iterative process in that it is not possible to properly assess the transportation issues without some quantitative indication of where housing will be located. The work on the Transport Assessment will continue during and beyond the Housing Options consultation and will clearly be a factor when the Council selects its preferred strategy for housing delivery.

## **INFRASTRUCTURE DELIVERY**

Another key consideration is infrastructure. Issues about infrastructure figure prominently in the responses received to date on the LDF. Given the emphasis on delivery, it is a requirement that the Core Strategy be accompanied by an Infrastructure Delivery Plan (IDP). This will identify the new/improved infrastructure that will be required to support the additional housing, together with the arrangements for delivery. This means working closely with the key infrastructure and service providers in the area, including the utility companies, transport providers and service providers such as the education authority and the PCT.

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There have already been discussions with the key infrastructure and service providers. To date these have not thrown up any locational issues of such significance that they prevent specific housing options being considered. However, it became clear that until the housing options are quantified further, it is difficult for the service/infrastructure providers to provide more specific responses. The dialogue with these service providers will continue and the forthcoming consultation will be an opportunity to engage with these providers to obtain a clearer indication of the implications for current and future infrastructure provision arising from the options.

## **FACTORS AFFECTING DECISIONS ABOUT THE LOCATION OF HOUSING**

As indicated in PPS3, there are a number of factors that determine both the broad strategy for the location of housing as well as choices about specific sites. These include:

- Strategic designations like the Metropolitan Green Belt (MGB)
- National and international designations such as the AONB, SPAs, SACs
- Local landscape and townscape designations (such as conservation areas, special character areas, strategic gaps etc.)
- Physical constraints such as areas liable to flooding
- Local housing needs
- Access to services, public transport etc
- Climate change factors
- Existing land use (for example where development would result in the loss of existing uses such as commercial land or land used for community facilities)
- The availability and capacity of existing infrastructure and the scope to improve or expand infrastructure to meet demands arising from new development.

## **HOUSING OPTIONS FOR CONSIDERATION**

As previously explained, the common factor in all the identified options is that development within the main settlements will continue to make a significant contribution towards housing supply. This is as it should be, given the national and regional policies encouraging development on previously developed land and in the most accessible locations.

Given past completion rates, it is also likely that the SHLAA will underestimate the potential that exists within settlements. The fact that a new windfall site is not identified in the SHLAA does not mean that it is unacceptable. These unidentified sites will continue to come forward.

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Phase 2 of the SHLAA sought to identify possible opportunities for development adjacent to the main settlements and the five largest villages. ***This section of the document will identify the potential capacity on greenfield sites identified in the SHLAA, once it is finalised.***

In addition, there may be other greenfield sites that will emerge through the process and that could be as suitable or more suitable than sites identified in the current version of the SHLAA.

The response to this consultation will help the Council to decide broadly what approach should be taken to meeting any shortfall. Before the Core Strategy is finalised, it will be necessary to further refine the options and develop a mechanism for weighing up the relative merits of possible sites and broad locations.

For example, how much weight should be given to the impact of the Thames Basin Heaths SPA? This affects development opportunities in most of Farnham. If it is proposed that a proportion of the housing requirement should be in Farnham, within the zone affected by the SPA, then it will be necessary to have an avoidance strategy, including the identification of Suitable Alternative Natural Greenspace (SANG) to deal with the impact of this new housing. However, there is also the option of considering whether the Waverley housing requirement could be met without the need to build houses within the zone of influence of the SPA.

South East Plan Policy NRM6 deals specifically with the Thames Basin Heaths SPA. It indicates that priority should be given to directing development to those areas where potential adverse effects can be avoided without the need for mitigation measures. However, if this approach were taken it would have potentially significant implications for other parts of Waverley, given that Farnham has traditionally delivered about a third of the new homes built in the Borough. Consideration of such an approach would also need to be balanced against other factors and constraints influencing the location of development elsewhere in Waverley.

For example, there is the issue of the Green Belt. If the Council took the view that all existing Green Belt land should be safeguarded, then it would have the effect of preventing the release of new greenfield sites across much of Waverley.

Planning Policy Guidance Note (PPG)2 sets out the national policy on green belts. It makes it clear that the Green Belt boundary should only be altered in exceptional circumstances. Therefore, if the Council were seeking to alter the Green Belt boundary it would need to demonstrate that it had considered the opportunities for development within urban areas contained by the Green Belt and beyond the Green Belt. The main settlements in Waverley are affected by the Green Belt to different degrees. Godalming is surrounded by the Green Belt and the Green Belt abuts Haslemere for much of its northern and western side. Farnham lies largely beyond the Green Belt, as does Cranleigh.

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PPG2 has specific advice concerning villages in the Green Belt. In Waverley, most of the villages are within the Green Belt. The main villages lying beyond the Green Belt are Dockenfield, Dunsfold, Alfold and Ewhurst. Currently, the villages within the Green Belt are “washed over” by the Green Belt rather than being excluded from it. PPG2 advises that if only very limited development in the form of infilling were proposed then the Green Belt can wash over the settlement. However, if development other than infilling, including limited expansion, were proposed then the village should be inset (i.e. excluded from the Green Belt). This will be a factor when considering the contribution of villages to meeting housing supply. For those villages outside the Green Belt, the current approach in Waverley is that these are washed over by the countryside notation rather than being specifically excluded from it. Local Plan policy RD1 identifies specific villages with a settlement boundary and allows for some limited development within these villages. Other smaller and loose-knit villages are subject to the general Green Belt/countryside policies.

Another factor will be accessibility to jobs services etc. As previously explained, the broad thrust of national and regional policy means that the focus should be on developing in the most accessible locations. On this basis, development in less accessible settlements is likely to be more limited.

A further factor will be the availability of infrastructure and, where needed, the scope to improve/expand infrastructure. This will be informed by the outcome of the further consultation with key service and infrastructure providers.

## **HOW MANY HOMES TO PLAN FOR AND WHEN?**

Before considering the options for where housing might go, it is necessary to consider how many houses to plan for. This question was asked in the consultation on the Core Strategy Topic Papers earlier this year. The majority of those who responded at that time were of the view that the Council should only plan for the 5000 new homes.

What Waverley must do is to plan to deliver at least 5,000 new homes as required by the South East Plan. The South East Plan says that local authorities can, if they choose, test higher housing numbers through their LDFs provided they are consistent with the principles of sustainable development set out in PPS1 and tested through sustainability appraisal and Habitats Regulations Assessment.

The arguments for planning for more than 5000 new homes include the high level of identified need for affordable housing in Waverley and the demand for market housing. There is also the fact that the South East Plan will be subject to an early review to consider higher levels of house building across the South East.

On the other hand, it will be a challenge delivering the 5000 new homes, given the shift in national policy away from windfalls and the implications for Waverley in terms of possible greenfield releases. Moreover, Waverley is not

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a sub-region or growth area within the South East Plan and is not seen as a focus for growth. Whilst it may be the case that a revised South East Plan will require higher levels of housing, that is not the case now. Therefore, the Council's focus will be on the immediate task of delivering the 5,000 homes required by the South East Plan.

## OPTIONS FOR THE LOCATION OF DEVELOPMENT

The options presented for comment have been derived from the relevant planning policy context; the previous consultations and the evidence base, particularly the SHLAA, the draft Settlement Hierarchy and the Housing Market Assessment. Account has also been taken of the recent planning appeal decision in relation to the new settlement proposal at Dunsfold Park. To put the options in context, the current approach to housing provision is to focus on development within settlements, particularly the four main settlements. Some limited development is also allowed within the villages specifically covered by Local Plan Policy RD1. There is also a policy allowing for small scale schemes for affordable housing within or adjoining villages where a need has been identified.

In addition to setting out the strategy for housing delivery, the Core Strategy should also set out the role of the different settlements. This should include identifying what type of development, if any, will be allowable within settlements. In relation to the options below, where development is envisaged within/around villages it is anticipated that the type and amount of development will have regard to the size and function of the settlement and the availability of infrastructure and services. It is also envisaged that whatever option is chosen there would still be a policy allowing for small scale affordable housing schemes to meet identified needs in the villages.

Each Option assumes that a proportion of the required housing will be within the main settlements of Farnham (including Badshot Lea), Godalming, Haslemere and Cranleigh and, therefore, the options are about where to locate the additional housing required to meet the South East Plan requirement.

The following five options have been identified for consultation:-

**OPTION 1: Development within the main settlements of Farnham, (including Badshot Lea), Godalming, Haslemere and Cranleigh, with any shortfall being met by selected releases of land around these settlements.**

<b>Advantages</b>	<b>Disadvantages</b>
<ul style="list-style-type: none"><li>Potentially the most sustainable option in terms of locating development where there is the best access to</li></ul>	<ul style="list-style-type: none"><li>Impact of new development more concentrated than in an option that distributes development more widely.</li></ul>

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<ul style="list-style-type: none"> <li>jobs, services etc.</li> <li>• Could be more deliverable as potential “available” sites have been put forward through the SHLAA</li> <li>• More flexible and easier to control the release of land, including phasing, compared to Options 4 or 5</li> </ul>	<ul style="list-style-type: none"> <li>• Less scope to meet local housing demand in the villages</li> </ul>
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**OPTION 2: Development within the main settlements (as listed in Option 1), with any shortfall being met by selected releases of land around these settlements and within and potentially around Beacon Hill and Hindhead and the five largest villages (Bramley, Chiddingfold, Elstead, Milford and Witley).**

Advantages	Disadvantages
<ul style="list-style-type: none"> <li>• It could provide additional development to sustain and support the local services that exist in these large villages.</li> <li>• More scope to meet local housing demand in these larger villages than with Options 1, 4 or 5.</li> <li>• Some potential “available” sites have been identified in the SHLAA.</li> <li>• More flexible and easier to manage the release of land, including phasing, compared to Options 4 or 5</li> </ul>	<ul style="list-style-type: none"> <li>• Potentially less sustainable than Option 1 in terms of access to services, jobs etc. particularly for those villages without a rail link.</li> <li>• Potential impact on the Green Belt if the villages in question were identified for limited expansion.</li> <li>• Could have a negative impact on the delivery of affordable housing exception schemes if landowners were to hold back sites on the edge of villages in the hope that they will be released for market housing.</li> <li>• Less scope to meet local housing demand in the smaller villages than with Option 3.</li> </ul>

**OPTION 3: Development within the main settlements (as listed in Option 1) with any shortfall being met by selected releases of land around these settlements and within and potentially around the villages generally.**

Advantages	Disadvantages
<ul style="list-style-type: none"> <li>• Impact of new development less concentrated.</li> <li>• More scope to meet local housing demand in the villages than with other options.</li> </ul>	<ul style="list-style-type: none"> <li>• Depending on the amount of development this is potentially a less sustainable option than either Option 1 or Option 2 in terms of access to jobs,</li> </ul>

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<ul style="list-style-type: none"> <li>• Depending on scale/location of development, could assist in supporting the retention of local services</li> <li>• More flexible and easier to manage the release of land, including phasing, compared to Options 4 or 5</li> </ul>	<p>services etc. Even if it helps to support the limited local services, the need to travel to access other services increases. None of the additional villages that would be included in this option have rail access, so in terms of public transport they are more reliant on local bus services.</p> <ul style="list-style-type: none"> <li>• Could have a negative impact on the delivery of affordable housing exception schemes if landowners were to hold back sites in the hope that they will be released for market housing.</li> <li>• Depending on size/location, it may be more difficult to introduce new development in/around smaller settlements without impact on the countryside than with development in/around larger settlements.</li> </ul>
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**OPTION 4: Development within the main settlements (as listed in Option 1) with any shortfall being met by a single urban extension to one of the main settlements.**

<b>Advantages</b>	<b>Disadvantages</b>
<ul style="list-style-type: none"> <li>• The potential benefits arise principally from scope to maximise economies of scale in terms of new infrastructure and services to support the development, and the scope to address climate change and sustainability issues on a larger scale (for example in relation to the use of renewable/low carbon technology).</li> </ul>	<ul style="list-style-type: none"> <li>• Potential impact of a single large development on local character and existing infrastructure.</li> <li>• Could be difficult to identify a single location suitable for this amount of development</li> <li>• Makes management of housing supply more difficult because it is an “all or nothing” option.</li> <li>• Less responsive to wider social and economic needs across the Borough than with Options 1-3.</li> </ul>

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## OPTION 5: Development within the main settlements (as listed in Option 1) with any shortfall being met by a new freestanding settlement.

Advantages	Disadvantages
<ul style="list-style-type: none"><li>• As with Option 4, the potential benefits arise principally from scope to maximise economies of scale in terms of new infrastructure and services to support the development, and the scope to address climate change and sustainability issues on a larger scale (for example in relation to the use of renewable/low carbon technology).</li><li>• In the Dunsfold Park case, the appeal inspector and the Secretary of State acknowledged that there were some advantages with that specific proposal, such as the low carbon lifestyle, the level of affordable housing proposed and the conclusion that the development would not materially harm the character and appearance of the countryside.</li></ul>	<ul style="list-style-type: none"><li>• Potential impact of a single large development on local character and existing infrastructure.</li><li>• The Dunsfold Park scheme failed on appeal due to the unsustainable location of the site in transport terms, the impact of traffic on the local road network, and the conflict with planning policy arising from the siting of a major housing and industrial development in a rural area.</li><li>• No deliverable alternative locations have been identified</li><li>• If the objective were to avoid development of this scale in the Green Belt, then the options in terms of location are very limited</li><li>• Makes management of housing supply more difficult because it is an “all or nothing” option.</li><li>• Less responsive to wider social and economic needs across the Borough than with Options 1-3.</li></ul>

### Option 6: Other (please specify)

Please specify any other option or combination of options that you think the Council should consider.

### Comments