

ANNEXE 1

KEY ISSUES RAISED IN THE CONSULTATION ON THE CORE STRATEGY PREFERRED OPTIONS AND DRAFT POLICIES

A total of 1360 comments were received from 288 Respondents. These range from very specific and detailed comments on the wording of the policies and supporting text to comments questioning the overall soundness of the Strategy and suggesting that it needs to be altered significantly. Set out below is a summary of the key issues emerging.

Most comments were made on the chapter containing the policy on the amount and location of housing (382 comments received) and the chapter setting out the overall Spatial Strategy, which includes the broad policy on where development generally should be located (115 comments)

Housing location and supply

Most of the Town and Parish Councils, as well as some of the local organisations and individual consultees support the capacity based approach set out in the draft policy. This is on the grounds that the Borough is constrained by a lack of deliverable land, overburdened infrastructure, important wildlife habitats, landscape designations and the Green Belt. The view of these responses is that the approach to build within settlements will therefore protect the existing character of the Borough's towns, villages and countryside.

However, a number of local organisations and individual consultees stated that the housing target set out in the draft policy should not be expressed as a minimum, both for the Borough as a whole and for individual settlements. In their opinion, if the housing target remains a minimum it renders the target meaningless as it could be significantly exceeded. The view of these respondents is that building more houses above the target would have a detrimental impact on the character of Waverley, contrary to the preferred approach in the Core Strategy. Therefore the housing target should be expressed as a maximum.

For others the housing target in the draft policy is too high because it will have a detrimental impact on Waverley's character. In their view the figure should therefore be reduced. Some consultees commented that the figure was too high for the specific settlement their local organisation represented or they, as individuals, live in. In these cases, the target should be reduced for their settlement only. If the Borough wide housing figure were to be retained then the housing would need to be redistributed to other settlements.

Developers, landowners and agents oppose the draft approach. Some of the local organisations and individuals also oppose it depending on the specific interest they are representing. They consider the preferred approach not to be justified, effective or consistent. Therefore they consider that the Core Strategy would be found unsound under paragraph 4.52 of PPS12: Local Spatial Planning. This is because the preferred approach:

- Is based on a target identified in the SHLAA that is not credible as it only looks at the capacity of sites within existing settlements to deliver housing contrary to advice set out in PPS3: Housing
- Does not meet identified affordable housing need or the demand for market housing set out in the SHMA and other evidence
- Will not meet the needs of the local economy
- Relies on unplanned windfalls that should not be included under the advice set out in PPS3: Housing, as well as relying on outstanding planning permissions that will not necessarily be built
- Has a target that is significantly less than the approved South East Plan that the Core Strategy is still legally required to conform with and has been robustly examined for soundness
- Does not set out the implications for the approach and why it is preferred to the other options for housing

The objectors state that the housing target should be increased to at least the South East Plan requirements of 250 homes a year. In addition, the comment is made that as there is evidence that this housing target cannot be met by developing deliverable sites within settlements, the Council should release deliverable greenfield sites outside settlements. A number of specific sites were put forward for consideration.

One of the sites put forward for housing development was Dunsfold Park. A number of representations from across all the groups of consultees commented on this site, both in support of housing and against it.

Key consultees such as the Environment Agency and Natural England made comments on the preferred approach to housing relating to their specific remit such as the risk of flooding and the approach to the SPA respectively.

The Spatial Strategy

Many of the comments concerning the overall spatial strategy are linked to the key issue of the amount and location of housing. In addition to these some of the other key issues raised include:-

- Comments from Environment Agency concerning addressing the cumulative impact of small developments in terms of flood risk/drainage and providing more evidence/clarity regarding the application of the sequential approach to identifying sites in relation to the risk of flooding.
- Highways Agency identified the issue of considering the potential impact of development in Hindhead on the A3.
- Some comments that the Strategy is not sufficiently 'bottom-up'.
- Some respondents feel that the Strategy needs to be strengthened in terms of setting out how development will be managed within the Green Belt and the countryside areas not designated as Green Belt.
- Different views were expressed in relation to the Green Belt. Some consider that it must be preserved. Others consider that in view of the housing need,

the Council should consider reviewing the Green belt to identify opportunities for housing to meet needs.

- The role of Dunsfold Park was raised as were concerns about the approach to deciding on the Strategy and whether it would pass the tests of soundness.
- Some comments on the role of villages and the issue of getting the balance right in terms of supporting sustainable development, meeting local needs and protecting the environment. These include questioning whether the Council should differentiate more in terms of the type of development that will be acceptable in villages, depending on their size.

Other key comments

- Suggested that the overall vision is not sufficiently specific/spatial to be sound.
- Climate Change issues need to be given more weight
- Need to refer to the Minerals and Waste LDF documents produced by the County Council and any implications for the Core Strategy and other LDF documents that Waverley will produce.
- Some comments that the Sustainability Appraisal is inadequate.
- Infrastructure has again been raised as a significant issue. In some cases the comments have been about perceived inadequacies of existing infrastructure and ability to cope with the additional demands from new development. Some of the issues are localised (i.e. different infrastructure issues raised in different parts of the Borough). Where infrastructure is raised as a concern it is often in the context of concerns about the number of new homes being planned.
- Cross boundary issues have again been raised. This is mainly in terms of putting the Core Strategy in the context of planned major developments in areas around Waverley (including Bordon/Whitehill, Aldershot Urban Extension, the Queen Elizabeth Barracks site in Church Crookham and various sites in West Sussex close to Waverley). In addition, a comment was made on the need to consider the implications outside Waverley from any planned expansion or intensification of commercial development at Dunsfold Park. A number of comments were made on behalf of the South Downs National Park Authority. It generally welcomes the draft Core Strategy, but feels that the document as a whole fails to recognise the constraints and opportunities presented by the location of the National Park on Waverley's southern boundary.
- Housing need – comment that the Council needs to analyse the Housing Needs Register to get a more precise picture of actual housing need in Waverley.
- A number of comments on the proposed affordable housing policy made a link with the overall number of new homes being planned for, again making the point that the lower overall target will not address the need for affordable housing.
- In terms of the proposed affordable housing policy, whilst there was support from some for the proposal to increase percentages and reduce thresholds, there were others opposed to the policy, citing impact on viability as the reason. There was also the comment that the Strategy on affordable housing does not take into account the impact of both the general economic climate and the more specific change in terms of the reduction in grant funding for affordable housing.

- In terms of rural exception sites, some sought more clarity/detail on the policy allowing rural exception sites in villages without a defined settlement boundary. There was also the comment that affordable housing need is generated in the main settlements and that the Council should consider a policy allowing exception sites around the main settlements, where the need has been demonstrated.
- In terms of other housing needs, there was the comment that the policy should be more specific in terms of quantifying and addressing specific needs (such as the need for housing for older people and the potential need for accommodation for students at the UCA in Farnham).
- In terms of employment there were a number of quite detailed comments. Of particular interest was the comment that the policy/strategy does not take account of the implications of the constrained growth model implied by the Policy on the number of new homes. It is suggested that the constraint on housing growth is not consistent with the planned economic growth for the area.
- In the employment section there were also a range of comments on Dunsfold Park and its economic role both now and in the future.
- In terms of the town centres and shopping policy, one of the comments requiring further investigation is whether the Plan should say more about other town centre uses over and above shopping.
- In terms of the rural environment there were a mix of views. Some supporting the general approach but suggesting that the strategy needs to go further, for example in dealing with protection of the wider countryside and the urban fringe areas.
- On the other hand some respondents referred to national policy in PPS7 and suggest that, in the absence of a formal assessment of landscape quality, local designations like the AGLV, the ASVI and Strategic Gap should be deleted.
- There were a number of detailed comments on the chapter on Townscape, Heritage and Design, including comments from English Heritage that will need to be followed up.
- In terms of biodiversity, a number of detailed points have been raised by the Environment Agency and Natural England, which will need to be followed up.
- Various comments were made on the issue of the SPA. In terms of Thames Basin Heaths, some suggested changes to the draft policy whilst others raised more fundamental issues, such as whether the policy of securing SANG works and whether development should be directed away from Farnham. There were also some comments to the effect that the Council should adopt a similar policy to deal with the impact of development on the Wealden Heaths SPA.
- In terms of Climate Change a number of very detailed comments have been made, requiring further consideration. This includes considering whether the policy goes far enough, alongside other comments concerning the financial implications for developers in meeting energy efficiency requirements and other sustainability measures.
- There were also comments on the proposed policy on freestanding renewable energy development. Friends of the Earth consider the policy is likely to prevent such developments from taking place.