

Comment	Council Response	Recommended change
<p>Housing number too high: Consider that a lower figure should be set to reflect constraints on development in Waverley. Concerns about inadequate infrastructure both now and inability of infrastructure to cope with extra houses. Some responses highlight infrastructure deficiencies in particular parts of Waverley. Some argue that circumstances have changed since the South East Plan was produced and that this justifies adopting a local figure. Some point out that the majority responding to the earlier consultation on housing numbers favoured a capacity-based figure, lower than the South East Plan. Some also comment that more account should be taken of the housing growth planned around Waverley (such as Whitehill/Bordon and the Aldershot Urban Extension and argue that this should justify a lower housing figure for Waverley.</p>	<p>Having regard to the evidence of need/demand, along with the evidence used for the production of the South East Plan, it is considered that it would be very difficult to justify a lower housing target for Waverley. The concerns regarding infrastructure are noted. There have been extensive discussions with infrastructure providers and whilst some mitigation measures will be required, no fundamental concerns have been raised that justify setting a lower housing figure.</p>	<p>No change to the Plan</p>
<p>Housing number too low: Others have argued that, notwithstanding the increase from the earlier draft Core Strategy, the housing target for Waverley is still too low. Many refer to the NPPF and the requirement plan to meet objectively assessed needs. In support of the argument, many refer to the evidence of unmet need for affordable housing and the high level of projected demand for market housing set out in the Strategic Housing Market Assessment (SHMA) 2009. Some also refer to the most up-to-date population and household projections for Waverley, arguing that 10,000 homes are needed over the Plan period of 2006 to</p>	<p>Waverley is not unusual in having a high level of housing demand as well as a need for affordable housing. However, a balance needs to be struck. Evidence of demand are based largely on projections of population change which are derived from previous trends. It does not follow that it is right to facilitate a continuation of these trends, including the significant amount of population change projected to result from high levels of net migration. Waverley is not within any</p>	<p>No increase in housing numbers is proposed, but see the list of other changes proposed to Chapters 5 and 6 below.</p>

<p>2028. Some also point out that the projections of population increase and household growth in Waverley have increased since the South East Plan was produced. Some argue that Waverley should have a more up-to-date local assessment of housing need.</p> <p>Some have also made the link with the local economy and the likely increase in employment floorspace over the Plan period. It is argued that more homes are needed to support this. There is particular reference to the ageing population. The comment is that businesses need affordable housing and affordable market housing for employees. Also the comment that if insufficient new homes are provided there will be an increase in cross-boundary commuting.</p> <p>Some have also argued that the Council has disregarded potential sources of housing supply that could, if used, help to deliver an overall increase in the amount of housing. For example through the use of some of the rural brownfield sites, including Dunsfold Park.</p> <p>Others argue that there is sufficient land available, such as countryside on the edge of settlements, that could support a higher housing target.</p> <p>Some argue that it is not reasonable to set a lower figure based on some housing needs being met in other areas.</p> <p>Some argue that there is an inconsistency between the Council's corporate priority of delivering affordable housing and the overall housing target that they believe limits the scope to deliver more</p>	<p>of the growth areas identified in the South East Plan and the South East Plan EiP Panel commented that there was very limited potential for the borough to contribute more than the 230 homes a year in a sustainable manner.</p> <p>It is reasonable to draw attention to the significant developments planned around Waverley and the potential contribution that they will make to meeting housing needs within the housing market area that Waverley shares with these districts.</p> <p>It is also considered that there is a reasonable case to revert to the South East Plan Option 1 figure as circumstances have changed since the South East Plan EiP Panel considered this issue and there is considered to be less scope to deliver the 250 a year in a sustainable manner.</p>	
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<p>affordable housing. In terms of what housing figure is needed, some argue that the Council should at the very least revert to the 250 requirement in the South East Plan. Others argue for a much higher allocation, based on projected population/household growth and the level of unmet need for affordable housing.</p>		
<p>Comments on the broad distribution of new homes: There have been a number of comments about the broad distribution of homes, particularly the proposed release of greenfield sites. Some are supportive of the broad approach, whilst others disagree for a variety of reasons:</p> <ul style="list-style-type: none"> • Some argue that the Council should not discount the use of Green Belt land to meet some of the projected need. It is argued that it may be more sustainable to consider allowing some change to the Green Belt boundary to allow for growth on the edge of the main settlements as well as the larger, second tier villages, such as Milford. There is a similar comment about the limitation of not considering land releases in the AONB/AGLV and the impact this has, for example, by limiting options for housing growth in the Haslemere area. • Some argue that by limiting greenfield releases to the non-Green Belt, non-AONB and non-AGLV areas it puts undue pressure on these locations. There is a particular reference to Farnham and Cranleigh. Some of those opposing the distribution refer to 	<ul style="list-style-type: none"> • Officers believe that if there is scope to meet the housing target in a sustainable way without the need to use Green Belt land or land that is designated as AONB or AGLV then this is a reasonable approach and is not inconsistent with either the NPPF or the South East Plan. There will still be scope for development within the main settlements that are surrounded by these designations and scope for limited development within villages. There will also continue to be the scope to provide local affordable housing schemes in/around villages, where a need is identified, in accordance with Policy CS6. There will also be the scope to consider development on rural brownfield sites on a case-by-case basis. 	<p>No change to the overall distribution of housing, but see below for other changes to Chapters 5 and 6</p>

<p>particular issues in these areas that they consider should be taken into account. For example, in Farnham the reference is to issues regarding infrastructure; particular concerns about the constraints imposed by proximity to the SPA, particularly Thames Basin Heaths SPA; and references to the impact of housing planned in the areas around Farnham. In relation to Cranleigh the concerns mainly relate to infrastructure capacity in Cranleigh and surrounding villages that are on the same road network, and a concern about the size of the proposed greenfield release compared to the small size of Cranleigh in comparison to the other main settlements. There is also a reference to Cranleigh not having a rail link.</p> <ul style="list-style-type: none"> • Some comment that there is a lack of justification for the 50:50 split of greenfield releases between Farnham and Cranleigh. • Some argue that more account should be taken of infrastructure limitations in determining the distribution of housing. • Some argue that the Council should look more actively at the potential for rural brownfield sites to deliver housing. • There is a particular reference to Dunsfold Park. It is argued that the Council has not properly considered the contribution that some housing at Dunsfold Park could make to meeting housing requirements. In relation to this there is a reference to the planning 	<ul style="list-style-type: none"> • It is not considered that the proposed strategy places undue pressure on the non-Green Belt countryside. • In relation to Farnham this is the largest settlement in Waverley and the most sustainable in terms of the range of services, access to public transport etc. Evidence does not indicate insurmountable problems in relation to infrastructure and this assessment has taken into account planned developments outside Waverley. In relation to the SPA issue, it is considered that if the Council were to seek to redistribute the housing planned for Farnham to other parts of Waverley, this would put undue pressure on other areas; is more likely to require use of Green Belt and/or AONB/AGLV land; and would result in a strategy that does not respond to housing needs arising in the largest settlement. Agreed measures are in place to provide avoidance/mitigation such that housing in Farnham would not have an adverse impact on the SPA. 	
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<p>appeal decision regarding Dunsfold Park and the expectation that the option of meeting housing needs at Dunsfold Park should be considered through the LDF alongside other options.</p>	<ul style="list-style-type: none"> • In relation to Cranleigh, it is acknowledged that this is the smallest of the main settlements. However, it is considered that there is the potential for limited releases of land on the edge of Cranleigh to contribute to meeting the overall target. • Given the size of Cranleigh and in recognition of some of the constraints around Farnham, it is considered that the 50:50 split in terms of the greenfield releases is appropriate. • In terms of other potential locations, it is recognised that there may be scope for some housing growth on rural brownfield sites and, in fact, some are identified in the SHLAA. In relation to Dunsfold Park, it is not considered that the planned strategy requires a new settlement of the size previously proposed and its limitations resulting from its unsustainable location. Even a lower level of development (such as 500 or 1,000 homes) would still be likely to result in an unsustainable development. 	
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	<p>Although there are employment opportunities on site, it would still be necessary to travel off-site to access a range of other services and facilities and the size of development would be unlikely to support the on-site provision of these facilities.</p>	
<p>Lack of flexibility in the Plan: Some argue that the proposed strategy for housing is not flexible enough and does not take account the impact should some sources of supply not come forward (i.e. what would the Council do in such circumstances to ensure that the planned level of growth is still delivered?) In relation to this some refer to the reliance on windfalls as well as some sites in the SHLAA and uncertainty about whether they will be delivered. There are also comments about what will happen if it is not possible to find enough SANG to deliver the required amount of housing in the Farnham area.</p>	<p>The concern is acknowledged. Based on historic rates of housing delivery, including windfall sites, it is considered more likely that housing delivery over the whole Plan period will exceed the target. It should also be noted that there expected to be a healthy supply of housing in the early years of the plan. However, if it transpires that supply is not coming forward as planned then the intention would be to release additional land in accordance with the strategy set out in Policies CS1 and CS2.</p>	<p>See proposed changes to Chapters 5 and 6 below.</p>
<p>Comments on the components of housing supply: Some have questioned the justification for elements of the projected supply, including arguing that there is insufficient evidence. In relation to this, there is a particular reference to the continued reliance on windfalls and the effect of the NPPF requirement that any windfall allowance should not include an allowance for housing on garden land. Similar comment questioning the level of housing envisaged in the villages.</p>	<p>Officers consider that if anything the discounted windfall allowance for small sites underestimates what is likely to come forward over the whole plan. However, in the event that supply from these or other sources is less than planned, then there will be a contingency to address this (see above)</p>	<p>See proposed changes to Chapters 5 and 6 below.</p>

<p>Trigger for releasing greenfield sites: Some have argued that the Council should not release greenfield sites early in the Plan period. In essence it is argued that the focus should be on making use of land within settlements and only releasing greenfield sites later in the Plan period if it is necessary to meet the planned housing target.</p>	<p>Current evidence shows a shortfall between what is expected to be delivered within settlements and other sites already identified as having potential for housing and the overall target, hence the need for greenfield releases. It is considered that, subject to delivery of any specific infrastructure, these greenfield releases should be allowed. This is in recognition of the levels of unmet need, particularly for affordable housing and the scope for any greenfield releases to make a significant contribution to meeting that need. It has been acknowledged that there should be a contingency in the event that planned levels of housing supply do not come forward. This would be through additional greenfield releases in accordance with the overall Spatial Strategy. However, these would be reserve allocations subject to specific triggers for their release</p>	<p>See proposed changes to Chapters 5 and 6 below.</p>
<p>Inconsistency between proposed policies CS1 and CS2: It has been argued that as presently written there is an inconsistency between Policy CS1 and Policy CS2. In essence this is because CS1 says that the focus for development should be on land with the main settlements, with limited development in the villages, whereas, Policy CS2 promotes use of land within settlements, but also</p>	<p>This is noted and it is agreed that both policies should reflect the fact that there will need to be some limited releases of greenfield land to deliver the planned level of housing.</p>	<p>See proposed changes to Chapters 5 and 6 below.</p>

allows for selected releases of greenfield land on the edge of main settlements.		
Strategic sites should be included in the Core Strategy: Some argue that the Core Strategy should be the place where decisions are made on which strategic sites are needed to deliver the strategy. In essence it is argued that the identification and allocation of sites key to the delivery of the Strategy should not be left until the Site Allocations document is produced. Those making this point refer to the NPPF for support.	In order not to add further delay to the process of getting the Core Strategy agreed, it is considered that the two-stage approach should be followed. The Core Strategy does provide clarity about how the Council will meet its housing requirements, but it is considered reasonable to leave the specific identification of sites to the site allocations stage.	No change to the Plan.
Green Belt: There is a mixed response to the proposed approach on the Green Belt. Some argue that the Council should have an even stronger worded policy to protect the Green Belt and to say that no changes to Green belt should be made over the life of the Plan. Others argue (see also above) that the Council should relax Green Belt boundaries to allow for some planned development within/around the towns and villages currently constrained by the existing Green Belt boundary. It is argued that this would be a sustainable approach and would support the vitality of these settlements.	The wording of Policy CS1 should be revised to reflect the NPPF. Beyond this, it is considered that the approach should continue to be that there is no justification for a review of the Green Belt boundary. As explained above there will continue to be scope for development within the main settlements that are surrounded by the Green Belt and for more limited development within/adjoining villages to meet local needs.	No change to the Green Belt boundary
The role of villages: Similar to the above, there are some who argue that generally the Council should allow some development in the villages.	Policies will continue much as they are with scope for small scale development within villages that have an existing defined settlement boundary, as well as affordable housing schemes on the edge of villages where a local need has been identified.	No change to the Plan
Duty to Co-operate: Some argue that the Council	The Council has undertaken extensive	References to the 'duty to co-

<p>has not adequately discharged its responsibilities under the new 'duty to co-operate'. There is particular reference to cross-boundary infrastructure issues and the levels of growth planned in some of the surrounding districts.</p>	<p>work to identify and, as far as is possible, to address cross-boundary issues. A separate statement on the Council's response to the Duty to Co-operate will be published alongside the Plan.</p>	<p>operate' have been clarified/expanded</p>
<p>Sustainability Appraisal (SA): Some have challenged the robustness of the SA that has been carried out. There is a particular reference to whether alternatives have been properly assessed and the extent to which the SA has informed the proposed approach and why other approaches have been discounted. There is a particular reference both to the consideration of housing numbers and the options for where housing should go.</p>	<p>The SA report to be published with the Plan will clearly demonstrate how SA has informed the development of the Core Strategy, including the assessment of alternatives.</p>	<p>No change to the Plan</p>
<p>OTHER KEY ISSUES BY CHAPTER</p>		
<p>Introduction and Context (Chapter 1)</p> <ul style="list-style-type: none"> • Concern that the document refers to old national policy rather than the NPPF. • Challenges to the proposed housing target. • Request that the document is simplified both in content and format. The consultation was a complicated exercise and should have been publicised more widely. • Re-consult with the public once the NPPF has been taken into account and any changes have been made. • What evidence has the housing figure been based on – particular reference to the pending abolition of the SE Plan. • Revised wording provided by SCC in relation 	<p>Housing targets are dealt with in chapter 6.</p> <p>Unnecessary text is being deleted from the document prior to submission which will make it clearer. All households and businesses in the Borough were sent details of the consultation, as well as other forms of consultation.</p>	<p>Removal of references to PPSs/PPGs. Insertion of references to the NPPF.</p> <p>There will be a pre-submission consultation; no other consultation are planned.</p> <p>Addition of text on Local Economic Partnerships.</p> <p>Amendments to text on minerals and waste.</p>

to minerals and waste.		Addition of text on Habitats Regulations Assessment.
<p>The Spatial Vision (Chapter 3):</p> <ul style="list-style-type: none"> Some have argued that the Vision should be tighter. It has also been argued that important issues have been overlooked in the Core Strategy, such as youth unemployment and local pockets of deprivation. 	Scope of the Core Strategy considered to be appropriate. Some detailed amendments proposed to the Vision.	<ul style="list-style-type: none"> Point 2: Includes reference to planned development on edge of main settlements. Point 3: Include reference to infrastructure improvements required as a result of major developments outside Waverley. Point 5: reference to the size of settlement being a further consideration influencing the amount and location of development. Point 6: Include mention of tenure of housing. Point 8: Reference to main centres instead of town centres. Point 9: Delete “where appropriate” Point 12: Reworded to clarify measures to combat climate change. Point 13: Reworded to clarify measures to adapt to the effects of climate change.
<p>Core Strategy Objectives (Chapter 4): Many of the comments on objectives were in relation to comments on particular policies etc. so have been</p>	<ul style="list-style-type: none"> Agree to amend reference to the role of the countryside. 	<ul style="list-style-type: none"> Objective 1 reworded to refer to the UK Sustainable Development Strategy.

<p>considered alongside other comments on those policies. Other comments include:-</p> <ul style="list-style-type: none"> • a suggestion that the reference to countryside should include its value resulting from its intrinsic character and beauty; • a comment that the objective relating to sustainable development should be more up-to-date; • a comment that sustainable transport should be addressed in the Objectives; • a comment about supporting rural business generally; • some detailed comments about the wording of the objectives relating to biodiversity and climate change/flood risk. 	<ul style="list-style-type: none"> • Agree to update the reference to sustainable development. • Agree to add a further Objective relating to sustainable transport. • Agree to add reference to supporting rural business. • Other detailed wording changes proposed – see opposite. 	<ul style="list-style-type: none"> • Objective 3: Expanded to refer to supporting expansion of rural businesses. • New Objective 6: Supporting sustainable transport. • New Objective 7: Maintaining and protecting the Green Belt. • Objective 8 (formerly 14): Amended to include reference to protecting the countryside for its intrinsic character and beauty. • Objective 11 (formerly 8): Expanded to include reference to infrastructure needs arising from employment-related development. • Objective 18 (formerly 16): Amended to include ‘sustainable communities’. • Objective 19 (formerly 17): Reworded as recommended by Surrey Wildlife Trust. • Objective 21 (formerly 19): Reworded for clarity
<p>Spatial Strategy (Chapter 5):</p>	<p>The response to the main issues raised in relation to this chapter, relating to the broad location of development are set out above.</p>	<ul style="list-style-type: none"> • Updated policy section to refer to relevant SE Plan policies and the NPPF. • Clarify position regarding

		<p>greenfield releases to ensure consistency between policies CS1 and CS2.</p> <ul style="list-style-type: none"> • Expanded section regarding the duty to co-operate and how this relates to housing and infrastructure. • Further information on Whitehill/Bordon cross boundary infrastructure issues. • Clarity regarding the policy approach to the Green Belt. • More clarity regarding rural brownfield sites. • Wording in policy regarding villages now refers to development being allowed to meet local needs and to maintain vitality of the village (as per NPPF wording). • Reference to Waverley-specific landscape designations included (ASVI and Strategic Gap) • Reference to the South Downs National Park included. • Clarification regarding Milford hospital/Upper Tuesley • Clarify that the four main
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		<p>settlements include Badshot Lea, Beacon Hill and Hindhead.</p> <ul style="list-style-type: none"> • Added reference to agricultural land classification and need to consider this when allocating sites.
<p>Amount and Location of Housing (Chapter 6):</p>	<p>The response to the main issues raised in relation to this chapter, relating to the amount of housing and how it is to be distributed, are set out above.</p>	<ul style="list-style-type: none"> • Housing figures updated to base date of April 2012. • Reference added to future review of village boundaries • Reference added regarding Upper Tuesley • Explanation of the greenfield split between Farnham and Cranleigh • Clarification of approach to windfalls • Fallback position/contingencies added • Clarification regarding Wealden Heaths SPA • Incorporated statistical data regarding housing. • Clarify that greenfield releases relate to all the main settlements (to date most potential sites are at Farnham and Cranleigh, but

		<p>this doesn't mean that a site around Haslemere that is also outside Green Belt, AONB and AGLV could not be considered.)</p> <ul style="list-style-type: none"> • Reference to suitability of rural brownfield sites for housing being considered on a case-by-case basis.
<p>Sustainable Transport (Chapter 7): Some comments on the pressure of additional planned development on local transport infrastructure.</p> <p>Some comments about taking more account of the limited public transport, including taking account of the recent review of local bus services.</p> <p>Some argue that more account should be taken of the cumulative impact on local infrastructure of both the development planned in Waverley and that planned in surrounding areas.</p>	<p>In relation to additional pressures on local transport infrastructure and the cumulative impact from developments in Waverley and the surrounding area, this has been assessed through the updated Transport Assessment.</p> <p>Any infrastructure requirements are dealt with through the policy specific to infrastructure and through the implementation of the Infrastructure Delivery Plan.</p> <p>The bus review is a Surrey County Council responsibility however the policy in Sustainable Transport does state that there will be partnership working with Surrey County Council and other key stakeholders.</p>	<ul style="list-style-type: none"> • Updated policy context to reflect the NPPF. • Added reference to car sharers and low and ultra low emission vehicles. • Included details of the 2012 update of the Transport Evaluation, in particular the possible impacts of development outside of the Borough. • Removal of options considered. • Addition of a monitoring indicator: <ul style="list-style-type: none"> ○ Monitoring of effects on AQMAs
<p>Infrastructure, Services and Community Facilities (Chapter 8):</p> <ul style="list-style-type: none"> • Some have commented on the importance of identifying infrastructure to support 	<p>Policy already refers to requiring new development to meet the cost of necessary infrastructure and the Council working with partners to</p>	<ul style="list-style-type: none"> • Addition to policy to refer to phased development to ensure timely delivery of infrastructure provision.

<p>development and taking into account the lead-in time if major infrastructure improvements are need to support delivery of development.</p> <ul style="list-style-type: none"> Some argue that current deficiencies in infrastructure should be remedied before additional development is allowed. 	<p>ensure that infrastructure in the IDP is provided in a timely manner. Amend policy to require phasing of development where delivery is dependent on infrastructure provision.</p>	
<ul style="list-style-type: none"> Particular comment regarding the lack of evidence in relation to the need for playing pitches. 	<p>Sport England have raised concerns over the soundness of the policy without an up to date Playing Pitch Strategy. This has been commissioned by the Council and will be referred to in the IDP.</p>	<ul style="list-style-type: none"> No change
<ul style="list-style-type: none"> Some argue that there should be a specific policy on green infrastructure 	<p>Green infrastructure was referred to in the text. Agree to include in policy wording and amplify linkages with adaptation to climate change and cross boundary green infrastructure.</p>	<ul style="list-style-type: none"> Policy wording amended to refer to Green Infrastructure specifically. Text amplified regarding linkages with climate change adaptation
<ul style="list-style-type: none"> Some argue that provision of infrastructure should be subject to viability testing 	<p>Agree to amend policy.</p>	<ul style="list-style-type: none"> Reference to viability in the policy added.
<p>Affordable Housing and Other Housing Needs (Chapter 9): Regarding Policy CS5:</p> <ul style="list-style-type: none"> Some comments questioning whether the proposed policy is flexible enough to respond to changing market conditions. Some raise concerns about the impact of the proposed policy on affordable housing on viability. Some suggest that the evidence in the SHMA is now out-of-date. 	<p>Wording considered to be sufficiently flexible.</p> <p>Follow recommendations of the updated Affordable Housing Viability Study relating to reduction in percentage on smaller sites.</p>	<ul style="list-style-type: none"> Reduction in the requirement on small sites (1-4 net) from 20% to 10% Wording on sub-division of sites within the policy text No change to Policy CS6 No change to policy CS7

<ul style="list-style-type: none"> Some very detailed observations, for example, in relation to the mechanism that will be used to determine the level of financial contribution required if affordable housing is not being provided on site. <p>Regarding Policy CS6: Some comments on the approach the Council will take in determining what level of market housing would be allowed to support a rural exception scheme for affordable housing.</p> <p>Regarding Policy CS7: Some comments on the extent to which the policy properly deals with and supports housing for particular groups. There is a mixed response to whether the policy should seek to be more prescriptive in dictating the amount and type of housing needed for particular groups, or whether the market should dictate. Some of the groups mentioned include older people (partly in response to the ageing population; and those looking for lower-cost market housing.</p>	<p>We are carefully balancing need and development viability.</p> <p>Further detail on financial contributions is provided in the current advice note which will be updated.</p> <p>Policy CS6 provides clarity but there will be a need for applicants to provide evidence to justify the inclusion on market housing element linked to viability</p> <p>Policy CS7 strikes a balance between considering and identifying particular housing needs, whilst retaining flexibility to respond to local circumstances.</p>	
<p>Regarding Policy CS8: A large number of respondents raised concern that the policy should be reworded in the light of “Planning Policy for Traveller Sites” (PPTS) to prevent development of traveller sites within the Green Belt and some specifically refer to the Hindhead Tunnel construction compound.</p>	<p>Text amended to refer to the approach to gypsy and traveller developments in the Green Belt.</p>	<ul style="list-style-type: none"> Reference to determining applications in accordance with national government guidance has been removed in the policy and the text now states that “traveller sites in the Green Belt will not be supported, except in very special circumstances” which reflects PPTS. Policy also amended to

		incorporate the criteria that were formerly included in the supporting text.
Employment and the Economy (Chapter 10):		
<ul style="list-style-type: none"> Some comments about whether the Council should be more specific about the amount of employment land that should be planned for. Some raise a concern about a potential shortfall in available employment land in the future. 	<p>The Employment Land Review (ELR) demonstrates that it is difficult to establish the specific amount of employment land required to meet needs. It estimates that between 16,700 sq m and 33,864 sq m of land for B1 employment use is needed up to 2027. However, the actual amount needed will depend on the amount of existing employment floorspace in B2 or B8 use that is forecast to be surplus to requirements up to 2027 that can be used for B1 purposes. The existing text to the policy states that there is sufficient available derelict or vacant land on existing employment sites (“opportunity” land) in the short term as well as the potential for other medium/long term “opportunity” land to meet Waverley’s employment needs up to 2027.</p>	<p>New wording has been inserted in the relevant paragraph of the explanatory text to make it clearer why the amount of employment floor space needed has not been specified in Policy CS9.</p>
<ul style="list-style-type: none"> Some argue that a regular review of employment/housing sites is needed. 	<p>The Council considers the potential of available sites for housing in its Strategic Housing Land Availability Assessment (SHLAA) and the need for employment floorspace in its Employment Land Review (ELR). These are updated regularly and include looking at the potential for releasing employment sites for housing in accordance with the NPPF.</p>	<p>No change needed.</p>
<ul style="list-style-type: none"> General comments about whether there is enough support for the rural economy. 	<p>The approach in the NPPF is to support the sustainable growth and expansion of</p>	<p>The explanatory text and the policy have been changed to make it clearer</p>

	all types of business and enterprise in rural areas, both through the conversion of existing buildings and well designed new buildings.	that new employment development within rural settlements; the expansion of existing businesses both within and outside defined settlement boundaries and; the conversion of existing rural buildings for employment use, is supported.
<ul style="list-style-type: none"> Comments on the text and policy on Dunsfold Park were mainly about its suitability as a housing site and the issues relating to the content and preparation of a masterplan for the site. 	<p>It is considered that in terms of promoting Dunsfold Park for housing, these issues should be addressed through the housing chapter. In terms of the content of the masterplan, it is considered that the issues set out in the policy are appropriate, relevant and sufficient to provide a framework for the future management of development on the site without the Core Strategy being too over detailed. Although, the levels of aircraft movement is not strictly an employment use, the level of aircraft movements will determine the appropriate scale of employment activity and the need for this to be considered in the masterplan is best raised in this policy. In terms of setting out the process for preparing the masterplan in the Core Strategy text or policy, it is considered that the Core Strategy is too strategic to detail such matters. However, its preparation will need to be fully in accordance with the regulations including carrying out public consultation.</p>	No change to the Plan
Town Centres and Shopping (Chapter 11)		
<ul style="list-style-type: none"> Concern that figures and data quoted from the Town Centre Study 2008 is out of date. 	<ul style="list-style-type: none"> This issue has been raised with the consultants who undertook the study. The response was as follows: 	<ul style="list-style-type: none"> No change to Core Strategy

	<p>".....the strategy for future retail development and the Borough's individual town centres flows from the C&P Study and it's findings. While there may have been some changes I do not believe that these have fundamentally altered the role function of the centres in question and therefore the overall approach towards the respective centres remains inherently sound. In my experience problems only really tend to arise when specific site allocations identify floorspace "thresholds" derived from a quantitative need assessment and where underlying assumptions may have been overtaken by events (e.g. Population or expenditure growth rates have changed, etc). I do not think this is an issue at this stage but may need to revisited when if, for example, specific retail development sites were identified in the Site Allocations DPD ."</p>	
<ul style="list-style-type: none"> • Updates required in respect of NPPF 	<ul style="list-style-type: none"> • Accepted 	<ul style="list-style-type: none"> • Amendment to policy emphasising the sequential approach and the need to accommodate all retail and leisure needs in full within town centres, without being compromised by site availability.

		<p>The Town Centre Study 2008 has already indicated that site availability in Waverley towns and on their edges is extremely limited due to geography and restrictive policies. Emphasis will be on redeveloping existing sites where possible within town centres and identified key sites. Waverley is not a borough that has great demands on its town centres by large retail companies, but each centre does need to continue to enhance its offer in order to compete with towns outside the borough. Further work will need to take place at Site Allocations stage to identify any potential sites and to look at the current shopping areas to define primary and secondary frontages.</p> <ul style="list-style-type: none"> • The NPPF has also placed greater emphasis on the importance of local, neighbourhood and village shops and the policies have been updated to reflect this requirement.
Leisure, Recreation and Culture (Chapter 12)		
<ul style="list-style-type: none"> • Concern about the absence of a playing pitch strategy as part of the evidence base for the 	<ul style="list-style-type: none"> • Noted. Revised Playing Pitch Strategy and replacement Play 	<ul style="list-style-type: none"> • No change to the Plan

leisure and recreation policies.	Strategy due Autumn 2012.	
<ul style="list-style-type: none"> No dedicated theatre space in Farnham. Other arts buildings not suitable for various reasons. 	<ul style="list-style-type: none"> Not considered that there is evidence to justify a specific statement in the Core Strategy regarding provision of a theatre 	<ul style="list-style-type: none"> No change to the Plan
<ul style="list-style-type: none"> Changes due to the NPPF which proposes a Local Green Space designation. 	<ul style="list-style-type: none"> Accepted 	<ul style="list-style-type: none"> An addition to the chapter has been made to include the designation of Local Green Spaces through Local and Neighbourhood Plans. Currently the NPPF wording is used to describe such spaces. Further work will be needed in later documents to refine how nominated spaces can be assessed and designated.
Rural Environment (Chapter 13):		
<ul style="list-style-type: none"> Mixed response concerning the approach taken in relation to the AGLV. Some support the intention to retain the AGLV designation at least until the boundary of the AONB has been reviewed. Others suggest that the AGLV should be retained for the whole life of the Plan. Others opposed to the designation consider that development affecting landscape areas should be judged through criteria based policies. Mixed response in relation to the Strategic Gap. Again some support retention of the designation. Others consider that it should be reviewed and its objectives consistent with the original intention of preventing the 	<p>Local landscape designations will be reviewed at a later stage, through the Site Allocations and Development Management DPD.</p> <p>Any allocations of land such as the identification of any land considered to be of environmental/historic significance and the designation of local green spaces will be considered through the neighbourhood planning process – a reference to this has been inserted in the Leisure, Recreation and Culture chapter.</p>	<ul style="list-style-type: none"> Addition of text recognising the importance of agricultural land as well as using the agricultural land classification as a criterion when assessing sites in the Site Allocations DPD. Update policy context to reflect the NPPF.

<p>coalescence of Farnham and Aldershot.</p> <ul style="list-style-type: none"> • Opposition from some to the retention of the ASVI designation. • Comment that land considered to be of environmental/historic significance should be identified. • Comment that the designation of 'local green spaces' should be given weight in this chapter. • Concern about possible conflict between the rural environment policy CS15 and the policy on freestanding renewable energy development (CS20). 	<p>Policy CS20 states that the benefits of a proposal for renewable energy will be weighed taking into account the importance of the protection of the local environment. The AONB is afforded protection by the application of the NPPF and the Surrey Hills AONB Management Plan, and these same principles will apply to the AGLV. These variances in policy would be enough to ensure that there is no inappropriate renewable energy development in the AONB/AGLV.</p>	
<p>Townscape, Heritage and Design (Chapter 14): Some detailed changes to the wording of Policy CS16 and associated text proposed by English Heritage</p>	<p>Agree</p>	<p>Some changes to wording to reflect up-to-date terminology</p>
<p>Comment that there should be a policy relating to preservation of wooded ridge tops.</p>	<p>This can be considered when the Development Management and Site Allocations DPD is produced.</p>	<p>No change to Core Strategy</p>
<p>Comment that this chapter should promote energy efficient design.</p>	<p>Noted, but consider that this can be addressed through cross reference with the policy on sustainable design and construction (Policy CS19).</p>	<p>Add appropriate reference to CS19</p>
<p>Comment that the word 'must' be used instead of 'should' when referring to taking account of other documents, such as design statements</p>	<p>Noted but consider it would be preferable to use 'will'</p>	<p>Change to point 1 of policy CS16.</p>
<p>Request that specific area in South Farnham be designated as a low density character area.</p>	<p>This can be considered through the Development Management and Site Allocations DPD</p>	<p>No change to Plan</p>
<p>Some detailed changes to policy wording proposed by the Surrey History Centre</p>	<p>Agree</p>	<p>Changes to policy CS16, including adding reference to archaeological</p>

		sites and historic landscapes.
Comment that Areas of Strategic Visual Importance should be mentioned.	Noted. These are covered in the policy on Landscape Character (Policy CS15)	No change to Plan
<p>Biodiversity and Geological Conservation (Chapter 15):</p> <p>Policy CS17</p> <p>Some comments regarding the strength of wording and flexibility of the policy and consistency with the NPPF. Clarity required regarding the hierarchy of sites and protection of habitats and species outside designated sites.</p> <p>Proposed amendments from the Environment Agency regarding the protection of river banks and the Water Framework Directive.</p> <p>Need to consider green infrastructure.</p>	<p>Noted.</p> <p>Agreed in part. Some amendments made, however some of the suggestions will be more appropriately placed in the Development Management and Site Allocations DPD or a Supplementary Planning Document.</p> <p>There is existing evidence on green infrastructure and this forms part of the existing biodiversity policy and the infrastructure policy.</p>	<p>The structure of the policy and wording has been amended to provide clarity and ensure the policy is consistent with the NPPF.</p> <p>Amendments have been made to include reference to the protection of river banks and the Water Framework Directive.</p>
Habitat Regulations Assessment recommends that new dwellings within 400m of Wealden Heaths SPA should be subject to project level HRA.	Agree	Amendment to Policy CS17 that a project level HRA will be required for any development which results in a net increase in residential dwellings within 400m of the Wealden Heaths Phase 1 and 2 SPAs.

Natural England recommend large scale development within 5km of Wealden Heaths SPA should be subject to project level HRA.	Agree	Amendment to policy that project level HRA required for large scale development within 5km of the Wealden Heaths Phase 1 and 2 SPAs
There has been confusion over the reference to the proximity of SANG to developments of fewer than 10 dwellings. Some have mistaken this to mean there is no requirement for SANG.	The policy wording is taken from Policy NRM6 of the South East Plan which is due to be revoked.	No change to Plan
Concerns have been raised that development should be directed away from Farnham to avoid impact on the SPA and that there is no evidence that the SANG and SAMM approach is effective in terms of the Waddenzee judgment.	The SANG approach is considered appropriate following advice from Natural England which is consistent with the examinations of Core Strategies in other Thames Basin Heath authorities.	No change to Plan
Climate Change (Chapter 16): Concerns that policy on renewable energy development is not positive and puts too many constraints. Out of keeping with NPPF.	Agree	<ul style="list-style-type: none"> Policy CS20 has been made more positive, removing the criteria and requirement for landscape character assessments.
Comment that building at higher density is out of keeping with other policies in Core Strategy	Disagree – the policy supports higher density development where appropriate	<ul style="list-style-type: none"> No change to the Plan.
Comment that benefits of green infrastructure for climate change adaptation should be highlighted.	Agree	<ul style="list-style-type: none"> Links between climate change and green infrastructure have been amplified
Water shortages, mains water provision and sewerage network issues (infrastructure).	Noted – these issues are dealt with under the chapter on and infrastructure	No change
Concern over location of development in areas prone to flooding.	Noted – this has been assessed as part of the sustainability appraisal and SFRA	No change

Policy should relate to all forms of flooding.	Agree	Change to policy text as per EA's recommendations and Thames Water's recommendations.
Recommendation to include a policy on the location of development in relation to wastewater treatment works.	Noted – if appropriate this will form part of the Development Management and Site Allocations DPD.	No change
Flood risk management should continue to be monitored.	Agree	Additional monitoring indicator – number of permissions granted contrary to EA advice.