

Annex 1

Schedule of Responses

1. Introduction and Context

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
Cranleigh Parish Council	CSPS101	1.1	CPC welcomes the Core Strategy and how it will guide development in the Borough over the next 16 years. CPC makes the following general points on this section: 1. CPC is concerned that the soundness of the core strategy could be questioned as it does not conform fully with national planning policy (see sec 6.6). This could result in uncontrolled development in Waverley and particularly in Cranleigh. 2. CPC wants to see full consultation with the residents of Cranleigh over the Core Strategy including exhibitions in public areas including major shops and other community facilities.	Added protections for Cranleigh are required, and more attention to the impact of the proposed development on the village infrastructure, including transport.	Regarding point 1, the Council considers that the Plan complies with the NPPF. The Council is aiming to get the Core Strategy in place as soon as possible to minimise the risk of uncontrolled development. Regarding point 2, there has already been extensive consultation and publicity on the emerging Core Strategy. The Development Management and Site Allocations DPD will focus on more specific issues and sites and the consultation arrangements for that document will reflect this.	No change to the Plan
Mrs. Margaret Jones	CSPS157	1.1			Noted	No change to the Plan
Mrs. Margaret Jones	CSPS192	1.1	My general comment would be that it appears to my very inexperienced eye to have been carefully compiled and looks legally sound. It is interesting reading, and takes into account all aspects to be considered when granting planning applications, and planning future building needs. As I read the plan to "assist and encourage retailers and businesses", I wondered whether Council rates for shops, and parking prices do really assist and encourage retailers and businesses.		Noted , however issues such as business rates and public car park charges are not dealt with through the Core Strategy.	No change to the Plan
Mr. Brian Keen	CSPS245	1.1	This comment is in relation to the consultation process. Consider that the notification in relation to the Pre-submission Core Strategy was very poor, with inadequate publicity. Found		There have been a number of consultations on the Core Strategy and extensive publicity through a variety of means as set out in the associated consultation statement. The Council	No change to the Plan in response to these comments.

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			access to the document difficult. Only found out with a week to go and found the web site not user friendly.		has also been flexible in relation to the different ways in which people have been able to make comments.	
Mrs Kathy Smyth - Guildford and Waverley Friends of the Earth	CSPS239	1.6	Reference to the previous consultations on the Core Strategy and the fact that Friends of the Earth has responded to all but one. Did not comment on the consultation in 2010 on the options for the number of new homes as it considered that this consultation was flawed. Objection is to Council's whole approach, which it considers has been capacity-based with the objective of keeping development to a minimum. Reference to earlier consultations and the Council's Brief for the Sustainability Appraisal in 2010. Consider it to be a negatively prepared Plan.		The Core Strategy has evolved over a number of years in the context of various changes in national policy as well as the background of the South East Plan. At various stages the Council has considered the implications of delivering a higher number of new homes. The Council has decided to proceed with a Plan that seeks to deliver the South East Plan Option 1 figure of 230 homes a year (the South East Plan final figure is 250 a year). The Council considers that there is a justification for this approach and this has been set out in the emerging Core Strategy and the associated Sustainability Appraisal.	No change to the Plan in response to these comments.
Mrs Sheila Smith	CSPS15	1.9	The comments from this respondent relate to the Sustainability Appraisal (SA). 1) SA Objective 6 is to "Encourage community identity and participation. One of the related questions concerns actions to address specific social/economic issues at Ockford Ridge and Aarons Hill in Godalming. Consider that there are also parts of Farncombe that should be mentioned. 2) The second point concerns flooding and the importance of considering this when planning the location of development, particularly as incidences of flooding are expected to increase. 3) This concerns health issues. This is with specific reference to the factual information in Appendix 11 of the SA. The comment is about the impact of the fact that Waverley has an ageing		Regarding point 1, this is not necessarily an exhaustive list. The point here is to flag up that even within a generally prosperous area like Waverley, there are still small areas which have very specific social/economic issues. Regarding point 2, the Council is very mindful of the issues regarding flooding, but feels that they have been addressed as far as they can be in the Core Strategy, which does not consider detailed site allocations. Regarding point 3, The Council is mindful that Waverley, like other areas, has an ageing population. It is considered that as far as it can, the Core Strategy addresses the issue, for example through Policy CS7. Regarding point 4, these matters are addressed in the policy on sustainable design and	Amend the SA report on page 144 to say that work has been carried out in Godalming and Farnham town centres to improve access for pedestrians and and cyclists. The document currently says Godalming and Farncombe.

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			population, with the associated implications for a range of services. 4) This point concerns carbon efficiency and the respondent comments that all new buildings should incorporate an element of solar energy. 5) This concerns water resources and comment on the potential strain on water resources. 6) Draws attention to a typing error in the transport section of Appendix 11 of the SA report.		construction (Policy CS19). It is not considered reasonable to require all buildings to include an element of solar energy, as there are a number of means by which carbon reductions can be achieved. Regarding point 5, the Council has liaised closely with infrastructure providers and this has not resulted in any fundamental issues regarding water supply that cannot be dealt with by providers. Regarding point 6, it is agreed that there is a minor typing error in this part of the SA that needs to be corrected.	
The Homes & Communities Agency	CSPS324	1.9	This comment relates to the Key Diagram (paragraph 1.8 in the Plan not 1.9).	The key diagram should be amended to make it clear that the Major Developed Site in the Green Belt is Upper Tuesley.	Agree - Key Diagram should be amended.	Amend Key Diagram by identifying the 'Milford Hospital/Upper Tuesley Major Developed Site in the Green Belt'.
UCA	CSPS349	1.9	The comment relates to the Sustainability Appraisal and the fact that the Education section of the Baseline Report (Appendix 11 of the SA) does not refer to Higher and Further Education generally or the University of the Creative Arts (UCA) specifically. Also comment that some of the evidence documents refer to the UCA using its old name of the University College of the Creative Arts.		Noted - the Baseline Appendix can be updated accordingly.	Update Appendix 11 of the SA Report to provide a short section on Further and Higher Education.
Natural England	CSPS353	1.9	No detailed comments to make on the Sustainability Appraisal.		Noted	No change to the Plan
Mrs Kathy Smyth - Guildford and Waverley	CSPS240	1.1	This respondent challenges the Sustainability Appraisal (SA) on a number of grounds. 1) Firstly it is argued that the SA fails to meet the SEA Directive. There is specific reference to	We can identify the problems. In some cases such as issues with monitoring we think these can be addressed but in others, such as the problem of failure to appraise alternatives, we do not think	Regarding point 1, it is considered that the Baseline does address the specific SEA requirement referred to. Regarding point 2, It is not a requirement of the SEA/SA to show	The SA could be updated to change to monitoring indicators if necessary.

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Friends of the Earth			<p>the the requirement to set out the environmental characteristics of the area likely to be affected. Not considered that this has been done as the relevant part of the SA is just the Baseline (Appendix 11). 2) It does not show how the Core Strategy objectives have been met. In relation to this, there is a specific mention of the issue of housing in rural areas. Reference to the SA saying that access to housing in rural areas is a particular issue. 3) Does not consider that the SA shows compliance with the NPPF. The example given is the NPPF requirement to to meet the full requirements for market and affordable housing. 4) The SA is not considered to be sufficiently thorough and analytical. In relation to this, the example given concerns monitoring indicators for the SA objective of using water, energy and other natural resources efficiently and to minimise carbon emissions so as to address the causes of climate change. The respondent challenges the effectiveness and relevance of the monitoring indicators attached to this SA Objective. There is also reference to the the monitoring indicators for renewable energy. 5) The SA fails to appraise alternatives properly. There is particular reference to Dunsfold Park and how this compares in sustainability terms with the Council's preferred option for housing deliver of greenfield releases on the edge of main settlements. It is not considered that there has been a proper comparison between the option of building homes at Dunsfold Park or edge of settlement land releases. 6) It is considered that</p>	<p>they can be remedied and this is one of the reasons we regard this Final SA report and Core Strategy as currently unsound.</p>	<p>how the Core Strategy objectives have been met. On the specific point of housing in rural areas, this has been addressed in the Core Strategy with the continuation of a policy to allow development within settlement boundaries and a policy to allow schemes outside village boundaries, which are predominantly for affordable housing, where a need has been established (see Core Strategy policies CS1, CS2 and CS6). Regarding point 3, it is not a requirement for the SA itself to comply with the NPPF. Regarding point 4, it is a matter of judgement as to whether the SA is sufficiently thorough and analytical. On the specific point of monitoring indicators, then if there are considered to be other means by which monitoring can take place then these could be considered as an amendment/addition to the SA. The point is that this is about how to monitor significant effects after the Plan has been adopted. Regarding point 5, it is again a matter of opinion as to whether alternatives have been appraised properly. In this case the respondent's specific concerns are in relation to the comparison between the option of building new homes at Dunsfold Park and the option of releasing land on the edge of the major settlements. It is considered that the SA itself, together with the various version of the Core Strategy, have demonstrated how the Council has considered alternatives, including the alternative of a new settlement. Regarding point 6, the Council considers that it has responded to comments made on the SA during the</p>	

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			<p>the SA fails to deal properly with responses to consultations. Again the reference here mainly concerns the previous representations made by this respondent in terms of the way in which Dunsfold Park and other alternatives have been addressed in the SA.</p>		Core Strategy consultations.	
Natural England	CSPS350	1.11	<p>The first part of this paragraph explaining the requirement for the Core Strategy to be assessed under the Habitats Regulations is unclear. We suggest the following: "The European Directive on the conservation of natural habitats and of wild fauna and flora (92/43/EEC) is transposed into UK law by the Conservation of Habitats and Species Regulations 2010 (as amended). Regulation 102 requires plan-making authorities to assess the impact of land use plans (such as Core Strategies) on internationally designated nature conservation sites. The impact of the plan must be assessed both alone and 'in combination' with other plans and projects. The Council is completing a Habitats Regulations Assessment of the Waverley Core Strategy, which will be available alongside the Publication of the Core Strategy."</p>		Agree - amend paragraph 11 accordingly.	<p>Amend paragraph 1.11 to read: "The European Directive on the conservation of natural habitats and of wild fauna and flora (92/43/EEC) is transposed into UK law by the Conservation of Habitats and Species Regulations 2010 (as amended). Regulation 102 requires plan-making authorities to assess the impact of land use plans (such as Core Strategies) on internationally designated nature conservation sites. The impact of the plan must be assessed both alone and 'in combination' with other plans and projects. The Council has completed a Habitats Regulations Assessment of the Waverley Core Strategy."</p>

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Natural England	CSPS354	1.11	Natural England commends your Authority for its approach of early and continued engagement throughout the HRA process, both with ourselves and with key neighbouring authorities such as East Hampshire District Council. Natural England has provided advice throughout the HRA process, most notably in our formal responses of 27 April 2011, 04 February 2012 and 03 August 2012. This last response was based upon the June 2012 version of the HRA which has now been submitted in support of the Pre-Submission Core Strategy. Natural England had no significant outstanding issues in relation to this version of the HRA and we therefore have no additional comments to make.		Noted	No change to the Plan
D&M Planning	CSPS292	1.19	These comments relate to two saved Local Plan policies that the Council is proposing to save alongside the Core Strategy. Policy BE3 relates to a designated part of south Farnham. The respondent disagrees with the policy for various reasons and considers that it should be omitted. The second policy is saved policy RD2. It is argued that this policy is now inconsistent with the NPPF in that it relates only to domestic extensions whereas the NPPF refers to all buildings. It is considered that this policy should be amended accordingly.		It is the Council's intention to save both of these existing Local Plan policies, pending completion of the Development Management and Site Allocations DPD. That will be the time to review these and other development management policies. It is recognised that the weight that can be attached to saved policies such as these may vary depending on the extent to which they accord with the NPPF.	No change to the Plan.
Rudgwick Parish Council	CSPS179	1.21	For information the Rudgwick Brickworks has been shut down permanently and the site recently sold.		Noted.	No change to the Plan
Surrey County Council	CSPS275	1.23	Update regarding progress with the Aggregates Recycling Joint DPD for the Mineerals and Waste Plans. This is currently going through Examination		Noted	Addition to the end of paragraph 1.23: "It is anticipated that the Aggregates

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			and, subject to the outcome of this, it is anticipated that this will be adopted early in 2013. Policy AR1 of the emerging DPD allocates the Alton Road site in Farnham for aggregates recycling.			Recycling Joint DPD will be adopted early in 2013. This emerging plan allocates Alton Road in Farnham for aggregates recycling."
A . Dovey	CSPS21	1.24	In the section dealing with Local Enterprise Partnerships (LEPs) there is no mention of the Surrey LEP. It is acknowledged that this is an unofficial LEP.		Noted, however, the proposed Surrey LEP has not been agreed. Therefore, it is the Council's view that paragraphs 1.24 and 1.25 should only refer to the officially recognised 'Enterprise M3' LEP.	No change to the Plan
UCA	CSPS336	1.24	UCA looks forward to continue playing an active role in the Enterprise M3 LEP		Noted	No change to the Plan
A . Dovey	CSPS28	1.27	The Core Strategy mentions the Surrey Strategic Partnership but it does not say how it will help meet its aims. Particularly the concept of the "limits of sustainability".		The relevant part of the Surrey Strategic Partnership Plan sets out the challenges facing Surrey, not the solutions. The Core Strategy recognises the need to balance the demands for development in the County against the constraints that limit the opportunities for growth.	No change to the Plan

2. Spatial Portrait

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
Cranleigh Parish Council	CSPS105	2.1	<p>Greatly improved infrastructure and services is needed in the Cranleigh area, particularly transport, energy, waste water processing and medical facilities. Support the need for continuing development of affordable housing to allow children of residents to remain in the area.</p> <p>Developments in the Horsham area will increase traffic on the A281 and impact the ability of Cranleigh residents to travel to Guildford.</p> <p>Ageing of Cranleigh population will reduce the market for Cranleigh shops. Maintaining the vibrancy of Cranleigh centre is vital for the wellbeing of the village. As many services as possible should be provided locally, to reduce the need for Cranleigh residents to travel.</p>	Added protections for Cranleigh are required, and more attention to the impact of the proposed development on the village infrastructure, including transport.	Noted. These issues are dealt with more detail under specific chapters and policies in the Plan.	No change to Spatial Portrait.
Central Land Holdings Ltd	CSPS243	2.3	Policy CS1 Location of Development specifically refers to Badshot Lea as being part of the built-up area of Farnham. The description of Farnham in 2.3 does not refer to Badshot Lea as being included, which it should be for consistency.	The description of Farnham in 2.3 should refer to Badshot Lea as being included in the area.	To specifically include Badshot Lea in this description of Farnham in the Spatial Portrait would make it different to all of the other descriptions. All of the main towns are made up of settlements of various sizes (Godalming has Farncombe and Binscombe, Cranleigh has Rowly, Haslemere has Hindhead and Beacon Hill,) within their parish boundaries. Farnham has a number of defined areas other than Badshot Lea (such as Wrecclesham, Rowledge, Hale etc) and these have not been referred to specifically in the Spatial Portrait, which is intended to be a brief snapshot of the character of the	No change to Core Strategy.

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		2.3				borough, while later chapters and policies such as CS1 are more site/location specific.
A. Dovey	CSPS22	2.5	2.5 mentions ageing population but fails to draw attention to the shortage of care staff.		This comment is noted and acknowledged generally, but it is too detailed an issue for the Core Strategy.	No change to Core Strategy.
Mrs. Sheila Smith	CSPS9	2.7	When heat maps are drawn should show in detail the large areas of deprivation such as Farncombe, Binscombe and Ockford Ridge/ Eashing Lane, Godalming; as in some instances some areas of deprivation are combined with areas of affluence which mask the areas of deprivation.		Waverley is aware of the specific areas of deprivation mentioned.	No change to Core Strategy.
UCA	CSPS337	2.9	UCA is grateful for reference.		Noted	No change to Core Strategy
Environment Agency	CSPS241	2.14	It is not clear where the names of the reaches of the River Wey have come from and 2.14 omits the stretch from Farnham to Tilford.	We recommend the following text: Rivers flowing through the Borough include the River Wey and Cranleigh Waters. The North Wey (a chalk river until Farnham) flows from Alton to Tilford, joining the Borough at Wrecclesham. The South Wey flows from Haslemere to Tilford and the combined Wey from Tilford to Godalming. The Cranleigh Waters flows from Cranleigh to Bramley. Without this change the policy will omit a large section of watercourse and will not therefore provide the same level of protection across the remainder of the Borough. This would conflict with the Water Framework Objectives and would also be contrary to the National Planning Policy Framework. A simple, minor, change to the policy would address this to a point where we would consider it sound.	Accepted.	Factual change to be made to Core Strategy. Para 2.14 to read: Rivers flowing through the Borough include the River Wey and Cranleigh Waters. The North Wey (a chalk river until Farnham) flows from Alton to Tilford, joining the Borough at Wrecclesham. The South Wey flows from Haslemere to Tilford and the combined Wey from Tilford to Godalming. The Cranleigh Waters flows from Cranleigh to Bramley. The Wey and Arun Canal is

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		2.14				gradually being restored in parts and its recreational value has increased.
Mr. Neville Carter - Bourne Residents Association	CSPS167	2.15	Bargate stone is not uncommon but it is not the vernacular style.		This information came from a reference book on West Surrey Architecture, and has been substantiated by Waverley's Historic buildings officers.	No change to Core Strategy
English Heritage	CSPS214	2.15	This section should use both quantitative and qualitative data to explain the heritage characteristics of the Borough.	Section should reference the number of locally important assets within the Borough and document the state of the Borough's historic environment.	Chapter 14: Townscape, Heritage and Design does quantify some of the heritage characteristics of the Borough. The Spatial Portrait is intended to be a snapshot of the Borough, and the Core Strategy a high level document which does not go into this level of detail. There are however, an increasing number of Town and Village Design Statements, Health Checks and Conservation Area Appraisals which are able to give more detail about the heritage aspects of Waverley, and Neighbourhood Plans are also likely to comment on these aspects. These documents contain locally produced assessment of character through the village and town design statements that the Council has adopted as material considerations. It is noted that although the consultee makes these points he does consider the Core Strategy to be both sound and legally compliant.	No change to Core Strategy.
Cranleigh Parish Council	CSPS102	2.19	Cranleigh is also affected by heavy traffic in the A281 (its main link to Guildford), even though it is not actually on that road.	Added protections for Cranleigh are required, and more attention to the impact of the proposed development on the village infrastructure, including transport.	Comments noted, however discussions with Surrey County Council about the distribution of development have not revealed any fundamental traffic issues relating to this part of the Borough.	No change to Core Strategy.

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South Downs National Park Authority	CSPS374	2.19	The spatial portrait does not highlight the important issue of accessibility to the main line railway stations. It is essential that all opportunities are explored to improve parking capacity and access by sustainable modes of travel to these stations. A particular issue is access and congestion during peak periods.	The spatial portrait should make reference to the existing standards of access to mainline railway stations. This is a critical infrastructure issue that has a bearing on the delivery of development to the south of Haslemere. The portrait should identify how journeys are currently undertaken and identify the need for sustainable forms of transport, such as commuter shuttle buses, to address this issue.	Paragraph 7.16 refers to the use of the station car parks and the scope for increasing their capacity in conjunction with improvements to other modes of access. It also states that any such increases in parking should be accompanied by measures to improve access to railways stations by bus, cycle and walking. This will be considered more fully in the Site Allocations and Development Management DPD.	No change to Spatial Portrait.
Cranleigh Parish Council	CSPS103	2.20	Cranleigh does not have access to a rail link. CPC wants to see continued study of bringing a light-rail link back to the Village along the retained transport corridor which was feature of the previous Waverley plan. The Core Strategy should refer to the existence of this transport corridor and its potential.	Added protections for Cranleigh are required, and more attention to the impact of the proposed development on the village infrastructure, including transport.	The Council's Infrastrucutre Delivery Plan notes that the Association of Train Operating Companies highlighted the former route of the track from Guildford to Cranleigh as a route that might be considered for re-opening, although studies by Surrey County Council have indicated that this is unlikely to be financially viable. Therefore it is not necessary to include it in the Core Strategy at this time.	No change to Core Strategy
South Farnham Residents Association	CSPS108	2.20	CS acknowledges the burden of traffic congestion caused by the level crossing in Farnham. Does not point out the poor air quality in the vicinity of the level crossing or give these burdens sufficient weight. Avoiding the acceptance of these significant issues brings doubt into the soundness of Waverley's ability to deliver the infrastructure to support the housing numbers that they consider sustainable in Farnham. It also brings into question whether Waverley has given local knowledge sufficient weight.		The Spatial Portrait is intended to be a snapshot of the Borough with a brief indication of the main issues and challenges that the area faces. Local knowledge is useful and valued, but always needs to be verified before actions are taken. The area around the level crossing is continually monitored for air pollution. The most recent report in 2011 stated: "A Detailed Assessment of annual mean nitrogen dioxide concentrations in the vicinity of Farnham level crossing has been carried out. This area was identified as being at risk of exceeding the annual mean objective for nitrogen dioxide in	No change to Core Strategy.

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		2.20			the Council's 2009 Updating and Screening Assessment. The Detailed Assessment has been carried out using a combination of measurements and detailed dispersion modelling, with the model results verified against the measurements. The assessment has determined that the annual mean nitrogen dioxide objective is not being exceeded at locations of relevant exposure in the vicinity of Farnham level crossing. It is therefore recommended that an Air Quality Management Area is not required. However, concentrations are close to the objective and monitoring should continue; it is further recommended that monitoring be carried out at first floor level close to the Receptor 1 site identified in this report. If measured concentrations increase in the future, then the results of this Detailed Assessment should be reconsidered."	
Cranleigh Parish Council	CSPS104	2.21	In terms of bus services Cranleigh is currently treated as a rural area and buses are infrequent in the evenings and Sundays and, except for the Guildford route, infrequent even at peak times.	Added protections for Cranleigh are required, and more attention to the impact of the proposed development on the village infrastructure, including transport.	Noted.	No change to Core Strategy.
Surrey County Council	CSPS269	2.22	It is not clear what is meant by 'limited road connectivity'.	Revise as follows: delete: The limited road connectivity and the limited public transport infrastructure, particularly in rural areas, and in some of the more urban areas does affect... Substituted text: This has an impact on the accessibility for residents, particularly those without access to a car, to jobs and services/facilities such as shops, education facilities, health	Accepted.	Amend Core Strategy.

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		2.22		services and leisure and recreational facilities.		
South Downs National Park Authority	CSPS378	2.36	Need to signpost the context of the South Downs National Park as a significant visitor and tourist attraction on the doorstep of the Borough. Haslemere has the potential to act as a gateway to the National Park. This means that it is important that serious examination is given to how visitor accommodation can be improved and how marketing and interpretation for the National Park can be enhanced within the town. It is also important that opportunities are taken to improve sustainable forms of access between Haslemere and the National Park.	There is an opportunity for Haslemere, because of the presence of the mainline station, to act as a gateway to the National Park. Consideration should be given to the different types of visitor likely to come into the South Downs National Park and the role Haslemere could perform for National Park visitors.	Paragraph 5.6 of the Spatial Portrait states: 'Waverley also adjoins the northern boundary of the South Downs National Park and Haslemere in particular is a gateway into the National Park from the north. The National Park provides a significant recreational asset close to Waverley.' Consideration of the types of visitors and the role of Haslemere is too detailed for this part of the Core Strategy, which is intended to be a snapshot of the Borough. The issue of improving access between Haslemere and the National Park could be considered in a review of the Infrastructure Delivery Plan and/or ongoing dialogue between Waverley and the South Downs National Park on planning and other matters.	No change to Core Strategy.
West Cranleigh Nurseries / Knowle Park	CSPS253	2.37	Fails to meet aims of the NPPF in particular 173 on ensuring viability and deliverability, most notably with the under provision for affordable housing. Consideration should be given to ways of encouraging the development of sites that provide social and physical infrastructure needs required to support the development and viability of settlements.		The Council is mindful of para 173 of the NPPF and has a sound evidence base for assessing viability. The Infrastructure Delivery Plan is a key document which addresses infrastructure requirements in the Borough.	No change to Core Strategy.

3. Vision

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Thursley Parish Council	CSPS212	3.1	Support the need to protect the essential character of the Borough's predominantly rural environment. Any compromise would deprive the Borough of its greatest attraction.	None	Noted	No change to Core Strategy.
UCA	CSPS338	3.2	University looks forward to working with the Council, and others, to ensure that this Vision becomes reality.	None	Noted	No change to Core Strategy.
West Cranleigh Nurseries / Knowle Park	CSPS357	3.2	Land adjacent to the settlement boundaries should also be considered. Point 11: To be in accordance with 118 of the NPPF, 'compensated for' should be added at the end.	Land adjacent to the settlement boundaries should also be considered. Point 11: To be in accordance with 118 of the NPPF, 'compensated for' should be added at the end.	Policy CS1 states that there will be limited releases of land on the edge of settlements outside the Green Belt, AONB and AGLV. The detailed identification of such sites is a matter for the Site Allocations DPD. Regarding the proposed addition to Point 11, this has been discussed with Natural England who consider that the reference to avoidance or mitigation is sufficient.	No change to the Core Strategy.
Mr Jerry Hyman	CSPS419	3.2	See CSPS430 relating to Policy CS18.	None suggested. Requires complete rewrite of Core Strategy.	See response to CSPS430.	No change to Core Strategy.
Mr Clive Smith	CSPS30	Waverley in 2028	Vision 9 is supported.	The word "protected" may be more suitable than "preserved". The words "especially within the Surrey Hills Area of Outstanding Natural Beauty" could be added at the end of the second sentence. This would give the necessary emphasis and be in recognition to the "enhancement of the natural beauty" purpose of AONBs within the relevant Act and adopted Surrey Hills Management Plan. As the policy approach within the Core Strategy to the AGLV is similar to that of the AONB, the words "and Area of Great Landscape Value" could also be added	See also changes recommended by English Heritage (CSPS217). Agree to revised wording of Point 9.	Point 9 be amended to read: "The rich heritage of historic buildings, features and archaeology in Waverley will have been conserved and enhanced. The attractive landscape of Waverley, which contributes to its distinctive character and includes the Surrey Hills Area of Outstanding Natural

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				after the suggested reference to the AONB at the end of the vision.		Beauty, will have been protected and where possible enhanced."
Mr P R Shelton	CSPS52	Waverley in 2028	Agree we need more cycle ways and encourage more people to walk and use public transport. Many parking problems in Haslemere.	None	Comments noted.	No change to Core Strategy.
Cranleigh Parish Council	CSPS106	Waverley in 2028	Supports the statement in section 3.2, with the following comments: Point 2. Given the substantial amount of new housing required in Waverley, there should be consideration of development of new settlements for example at Dunsfold Park (which could link directly to the A281), rather than just extension of existing towns and villages.	Added protections for Cranleigh are required, and more attention to the impact of the proposed development on the village infrastructure, including transport.	Paragraph 10.45 states that Dunsfold Park "represents an opportunity for employment development, intensification and expansion of activity to support the economic needs of the Borough. Dunsfold Park is not the Council's preferred location for accommodating housing growth". See also the Council's responses to representations on Chapters 5 and 6 regarding housing at Dunsfold Park.	No change to Core Strategy.
Mr Martin Small English Heritage	CSPS217	Waverley in 2028	Welcomes and supports 9 in the Vision for Waverley in 2028, although "conserved and enhanced" would be more consistent with the terminology of the National Planning Policy Framework.	Amend wording to be more consistent with the terminology of the NPPF.	Agreed.	Point 9 be amended to read: "The rich heritage of historic buildings, features and archaeology in Waverley will have been conserved and enhanced. The attractive landscape of Waverley, which contributes to its distinctive character and includes the Surrey Hills Area of Outstanding Natural Beauty, will have been protected and where possible enhanced."

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Central Land Holdings Ltd	CSPS248	Waverley in 2028	For the document to be consistent with the fact that that Badshot Lea has been included within the built up area of Farnham for the purposes of Policy CS1, the reference to Farnham within point 2 of the Spatial Vision in paragraph 3.2 should therefore be amended to include a statement that the built up area of Farnham includes Badshot Lea.	Reference to Farnham within point 2 of the Spatial Vision in paragraph 3.2 (as stated above), should therefore be amended to include a statement that the built up area of Farnham includes Badshot Lea.	To specifically include Badshot Lea in this description of Farnham in the Vision would make it different to all of the other descriptions. All of the main towns are made up of settlements of various sizes (Godalming has Farncombe and Binscombe, Cranleigh has Rowly, Haslemere has Hindhead and Beacon Hill,) within their parish boundaries. Farnham has a number of defined areas other than Badshot Lea (such as Wrecclesham, Rowledge, Hale etc) and these have not been referred to specifically in the Vision. The specific policy regarding the location of new housing recognises that Farnham includes Badshot Lea.	No change to Core Strategy.
UCA	CSPS339	Waverley in 2028	Surprised that there is no mention in the Vision to education, taking account of references to its importance in the NPPF, SE Plan, Partnership Vision for Surrey, SA, importance attached to it in other parts of the Core Strategy, and Employment Land Review.	Once the necessary changes have been made, this part of the document will be sound as it will be in accordance with central government guidance.	Point 3 of the Vision refers to working in partnership with other service providers to provide new infrastructure to support the increased population of Waverley, and para 8.3 of the chapter on Infrastructure goes on to define what infrastructure comprises. This includes education and a definition of this for the purposes of the Core Strategy.	No change to Core Strategy
Michael Conoley Associates	CSPS379	Waverley in 2028	Wrong wording in Point 3.	"Support will also be given to the retention of existing facilities." It should say: "Support will also be given to the retention of existing viable facilities."	Agree in part. Wording of Point 3 can be amended to say "where necessary".	Second sentence of Point 3 be amended to read: "Support will also be given, where necessary, to the retention of existing facilities and the provision of new facilities that provide for the leisure, recreation and cultural needs of the community."

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes proposed by representation	Council Response	Implications for Core Strategy
Mr Michael Smyth	CSPS171		Vision is meaningless, immeasurable, totally unspecific, no sense of deliverability or time. Core Strategy fails to recognise issues such as air quality and provide a spatial solution; it simply ignores the Sustainability Appraisal Objectives. The essence of the vision as expressed is complacency and conservation. Suggests that in 2028 the environment and character of Waverley will be maintained exactly as it is now which is not a plan for sustainable development. Historically, Businesses have been unwelcome other than the extent to which they supported residents.	Core Strategy needs to be re-written to take account of points raised.	The Vision aims to suggest what will happen by 2028 which is a 15 year time period. It does indicate where new development will take place in sustainable locations, as well as provision for new infrastructure to support the growing population, as well as sustainable economic development. This clearly does need to take account of the special character of the Borough. Vision point 12 addresses air quality in a general way, while dealing with the need to reduce emissions in the Climate Change chapter and policy.	No change to Core Strategy.

4. Objectives

Name/ Organisation	Paragraph/ Policy	Rep. Number	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
Cranleigh Consortium	4.1	CSPS43	Delivery of only 5,060 additional homes in Waverley in the period 2006 to 2028 (230 homes per year) is not consistent with the NPPF and related Ministerial Statements. No robust justification in the Sustainability Appraisal as to why 250 homes a year cannot be achieved and why the environmental benefits of not delivering this should outweigh the inevitable social and economic impacts. Will be difficult at the EiP for the Council to claim that it is boosting significantly the supply of housing and ensuring that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area. Given that there is adequate, unconstrained capacity on sites outside the Green Belt, AONB and other environmental designations and - in the case of Cranleigh - not affected by the SPA - then a general argument in the Sustainability Appraisal that "a balance has to be struck between protecting what is valued in the area and responding to local housing needs" is unlikely to hold up under close scrutiny.	Bullet point 9 of paragraph 4.1 should be revised to incorporate a higher minimum planned level of housing delivery. This should be assessed in light of available, suitable and appropriate land including that at Dunsfold Aerodrome.	See response to CSPS44 relating to Policy CS2	No change to Core Strategy.
Cranleigh Parish Council Cranleigh Parish Council	4.1	CSPS107	2. Cranleigh does not have best available access to jobs, services and other facilities. It remains a village. There are no statistics to show the large number of residents who leave Cranleigh for employment. 3. Support. Should have a bearing on how Cranleigh village is treated in the Core Strategy, which is not evident. 5. Support.	Added protections for Cranleigh are required, and more attention to the impact of the proposed development on the village infrastructure, including transport.	In comparison to other villages in Waverley, Cranleigh does have good access to employment, services and other facilities and this is confirmed in studies which form the evidence base to the Core Strategy, such as the Employment Land Review and the Town Centre Retail Studies.	No change to Core Strategy.

Name/ Organisation	Paragraph/ Policy	Rep. Number	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
	4.1		7. Concerned that the policy of maintaining the Green Belt without exception results in high pressure for almost unrestricted development in Cranleigh.			
Mr Neil Cooper	4.1	CSPS174	Need for a diverse approach to providing suitable sites for housing across the Borough should be stressed. Focussing development just into larger towns will mean that families in the smaller villages will not be able to remain local, and the towns will be more cramped.		Paragraphs 5.23 - 5.25 in the Spatial Strategy do explain that there is scope for infilling and small scale development in the defined village boundaries and for affordable schemes on the edge of villages.	No change to Core Strategy.
Thursley Parish Council Thursley Parish Council	4.1	CSPS213	Welcome protection of the Green Belt. Support safeguarding and enhancement of heritage, landscapes and townscapes.	Should be policies in the Core Strategy which make a real contribution to reducing light pollution by severely restricting lighting of all sorts in the countryside and minimising noise pollution. There appears to be nothing in the draft which refers to either of these issues. Should have an Objective to minimise the impact of light and noise pollution in the countryside.	Noted, however, this is a detailed matter better dealt with through the proposed development Management and Site Allocations DPD.	No change to Core Strategy.
Mr Martin Small English Heritage	4.1	CSPS218	Welcome and support 'Objective 16'		Noted, but assume that the consultee means Objective 17 which refers to the rich historic heritage etc. Objective 16 refers to leisure, recreation and culture.	No change to Core Strategy.
Central Land Holdings Ltd	4.1	CSPS249	In order for the document to be consistent with the fact that Badshot Lea has been included within the built up area of Farnham for the purposes of Policy CS1, the reference to Farnham within point 2 of paragraph 4.1 (as stated above), should therefore be amended to include a statement that the built up area of Farnham includes Badshot Lea.	Point 2 of paragraph 4.1 should be amended to include a statement that the built up area of Farnham includes Badshot Lea.	To specifically include Badshot Lea in this description of Farnham in the Objectives would make it different to all of the other descriptions of the towns and Cranleigh. All of the main towns are made up of settlements of various sizes (Godalming has Farncombe and Binscombe, Cranleigh has Rowly, Haslemere has Hindhead and Beacon Hill,) within their parish boundaries. Farnham has a number of defined areas other than Badshot Lea	No change to the Objectives.

Name/ Organisation	Paragraph/ Policy	Rep. Number	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
	4.1				(such as Wrecclesham, Rowledge, Hale etc) and these have not been referred to specifically in the Vision. Later chapters and policies such as CS1 are more site/location specific and reference to Badshot Lea as being part of Farnham is recommended as a change to para 5.15, which is considered the logical place to make this distinction.	
Mr Colin Hall CPRE SURREY	4.1	CSPS298	Welcomes many aspects of the document but considers that changes are required with particular regard to the protection of the open countryside to justify the Strategy and render it sound. Have commented on specific policies. Support the acknowledgment of the need to protect the essential character of the Borough's predominantly rural environment.		Noted	No change to Core Strategy.
UCA	4.1	CSPS340	Surprised that there is no mention in Objective 11 to education, taking account of references to its importance in the NPPF, SE Plan, Partnership Vision for Surrey, SA, importance attached to it in other parts of the Core Strategy, and Employment Land Review.	Once the necessary changes have been made, this part of the document will be sound as it will be in accordance with central government guidance.	Objective 11 does refer to provision of new infrastructure of all kinds to support the increased population of Waverley, and para 8.3 of the Core Strategy goes on to define what infrastructure comprises. This includes education and a definition of this for the purposes of the Core Strategy.	No change to Core Strategy.
West Cranleigh Nurseries / Knowle Park	4.1	CSPS358	Objective : Amount of housing provision is inadequate and not proportionate to the evidence of housing need and demand and figure should be increased at least in line with the SEP. Objective 9 is at odds with 10. The balance of housing and employment provision should be considered with support given to mixed developments and diversification of existing employment sites that enables settlements to improve their facilities and		See the Council's responses in relation to Chapter 6 and the issue of housing numbers.	No change to the Objectives.

Name/ Organisation	Paragraph/ Policy	Rep. Number	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
	4.1		infrastructure and reduce out-commuting to aide objective 15.			
Mr Andrew Triggs South Downs National Park Authority	4.1	CSPS380	Opportunity for Haslemere, because of the presence of the mainline station, to act as a gateway to the National Park. Consideration should be given to the different types of visitor likely to come into the South Downs National Park and the role Haslemere could perform for National Park visitors.	Objective 5 should make reference to the need for partnership working.	Noted. However, under the Duty to Co-operate local authorities are required to work together to address cross boundary issues. Not considered necessary to make a specific reference to partnership working within the Objectives.	No change to the Objectives.
Mr Jerry Hyman	4.1	CSPS420	See CSPS430 relating to Policy CS18.	None suggested. Requires complete rewrite of Core Strategy.	See response to CSPS430 relating to Policy CS18.	No change to Core Strategy.
Dunsfold Park Ltd Dunsfold Park Ltd	4.1	CSPS468	It is considered that the delivery of 5,060 additional homes (an average of 230 homes a year) is too low. The Council should be aiming for a higher number in order to address unmet housing need. The reasoning for this is provided within our responses to draft policies CS1 and CS2.	Bullet point 9 of paragraph 4.1 be should be revised to incorporate a higher minimum planned level of housing delivery.	See response to CSPS467 (Dunsfold Park representation on CS2)	No change to Core Strategy.

5. Spatial Strategy

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
Lamron Estates	CSPS60	5.2	Final sentence of paragraph 5.2 is inaccurate and should be deleted. Local Plans should provide the balance between aspirations of the community and the NPPF.	Delete final sentence of paragraph 5.2	Agree - amend sentence to delete reference to the LDF.	Final sentence of 5.2 amended to read: "We are expected to develop Local Plans that reflect local people's aspirations and decisions on important issues like climate change, economic development and housing.
West Cranleigh Nurseries / Knowle Park	CSPS359	5.2	Reference to NPPF and principles of positive planning are missing from the paragraph.		Noted - however there is a specific section in this chapter relating to the NPPF so it is not necessary to add a reference to it in paragraph 5.2	No change to the Plan
Mr Jerry Hyman	CSPS421	5.8	See separate section summarising the comments in relation to Chapter 16 'Biodiversity and Geological Conservation'.	See separate section summarising the comments in relation to Chapter 16 'Biodiversity and Geological Conservation'.	See separate section summarising the comments in relation to Chapter 16 'Biodiversity and Geological Conservation'.	See separate section summarising the comments in relation to Chapter 16 'Biodiversity and Geological Conservation'.
Mr Martin Small English Heritage	CSPS219	5.11	It is inequitable and misleading to identify just one of the 12 core planning principles in the NPPF as being a core principle, and to refer simply to policy on conserving and enhancing the historic environment even as a key element of the NPPF. "Conserve heritage assets in a manner appropriate to their significance" is also a core planning principle and should be identified as such.		Noted - the intention in paragraphs 5.11 to 5.14 is to provide a summary of the key elements of the NPPF. It would be inappropriate to repeat every Core Principle in the NPPF. Paragraph 5.14 does point out that the NPPF covers a range of issues, including national policy on conserving and enhancing the historic environment.	No change to the Plan

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
Mr Andrew Morris Bewley Homes Plc	CSPS390	5.11	Bewley is encouraged by the Council's inclusion of these paragraphs in the draft Core Strategy that makes clear reference to the core objectives within the NPPF. This text was absent from the revised preferred options and draft policies consultation document primarily due to the timing of its publication relative to the NPPF being published. In this respect, the revisions made to the text within these paragraphs is supported by Bewley.		Noted	No change to the Plan
Mrs Zofia Lovell South Farnham Residents Association	CSPS124	5.12	Waverley have acknowledged the NPPF states that "planning should encourage the effective use of land by reusing land that has previously been developed" but this is not reflected in their policy CS1.	We would like this statement reflected in any policy connected with the location of housing development.	See response in relation Policy CS2	No change to Paragraph 5.12
Mr Neil Cooper	CSPS175	5.12			Noted	No change to the Plan
Central Land Holdings Ltd	CSPS252	5.15	Policy CS1 states that for the purposes of Policy CS1, the built up area of Farnham includes Badshot Lea. In order for the document to be consistent, the reference to Farnham in paragraph 5.15 should also state that this includes Badshot Lea.	Amend paragraph 5.15 to make it clear that Badshot Lea is part of Farnham.	Agree - amend 6th sentence of paragraph 5.15 to include reference to Badshot Lea.	Sixth sentence of paragraph 5.15 should be amended to read: "The settlements in this category are Farnham (including Badshot Lea), Godalming, Haslemere and Cranleigh."
Mr P R Shelton	CSPS53	5.16	Agree that we should cooperate with other councils overlap for the everyone's benefit.		Comment noted	No change to the Plan
Mrs Zofia Lovell South Farnham Residents	CSPS109	5.16	Question whether cross boundary dialogue referred to in paragraph 5.16 is taking place. What evidence is there to support this? Also refer to NPPF	Provide evidence that cross boundary dialogue is on-going.	See separate report dealing with the Duty to Co-operate	No change to the Plan

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
Association			paragraphs 156 and 181.			
Farnham Town Council	CSPS302	5.16	Refer to brownfield developments taking place in adjoining districts, Rushmoor, Hart, East Hampshire. Refer to approximately 20,000 homes planned in the area around Farnham, with no cross-boundary plan to improve infrastructure. Questions raised about why greenfield development being considered on the edge of Farnham when there are brownfield sites available within 5 miles. Aldershot Urban Extension (AUE) has implications for residents in Farnham and Badshot Lea. There has been no cross boundary planning. Badshot Lea has been earmarked for substantial greenfield releases. No evidence that Waverley has begun to plan strategically with Rushmoor Borough Council. Also refer to developments planned in Hart. No evidence that Waverley has based its decisions for Farnham on what provision is available across the border. Also refer to the planned development at Bordon (with East Hampshire) and impact that will have on local roads and rail services.	Waverley Borough Council must initiate urgent discussions with Rushmoor Borough Council, Hart District Council and East Hants District Council, in order to begin strategic planning across local borders. All local infrastructure struggles at times and it is important that these authorities work together, to address all the issues, as development progresses around Farnham. Sewerage, water supply, education, traffic, air quality, public transport and education must all be carefully planned and monitored, as they are already under significant strain.	Major developments elsewhere are largely to meet the housing allocations contained within the South East Plan. The Council does take opportunities to comment on and seek to influence these developments, but there is a limit to the influence that Waverley can have. For example, the Aldershot Urban Extension is identified as a major allocation in the Rushmoor Plan. However, the detailed assessment of the impact of this development and any mitigation, including cross-boundary mitigation has been left to be addressed through the proposed planning application. Similarly, the Council has made representations on the proposed Eco-town at Whitehill/Bordon on the grounds that cross boundary impacts have not yet been fully identified and addressed. However, this matter will be addressed through the Examination of the East Hampshire Core Strategy. The Council considers that it has discharged its responsibilities in terms of the Duty to Co-operate as evidenced by the supporting report.	No change to paragraph 5.16.
Mrs Zofia Lovell South Farnham Residents Association	CSPS110	5.17	Question whether cross boundary dialogue referred to in paragraph 5.17 is taking place. What evidence is there to support this? Also refer to NPPF paragraphs 156 and 181.	Evidence to show that cross-boundary dialogue has begun and is ongoing.	See separate report on the Duty to Co-operate.	No change to the Plan
Mrs Zofia Lovell South Farnham Residents	CSPS111	5.18	Regarding paragraph 5.18 would be worthwhile to note other housing occurring on Waverley's borders and give evidence of dialogue with other	Need to add reference to other developments taking place on Waverley's borders and produce evidence of dialogue with these	It is not considered necessary to identify in the Waverley Core Strategy all the developments taking place in neighbouring areas. The Report on the	No change to the Plan

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
Association			councils. Specific reference to housing planned in various locations in Hart district.	councils.	Duty to Co-operate provides more information on cross boundary liaison with neighbouring authorities.	
Cranleigh Parish Council	CSPS128	5.18	Cranleigh Parish Council wants the effects on Cranleigh of developments in the Horsham area to be included in the consideration of cross-boundary issues.	Added protections for Cranleigh are required, and more attention to the impact of the proposed development on the village infrastructure, including transport.	Dialogue with Horsham District Council has not identified any significant issues. However, it is for the Horsham Plan to identify cross boundary impacts from development planned in that area and to identify any mitigation that may be required as a result. See separate report on the Duty to Co-operate.	No change to the Plan
Mrs Zofia Lovell South Farnham Residents Association	CSPS112	5.19	Consider it to be unsustainable to allow the proposed level of development in Farnham in view of the analysis of issues in this paragraph. Concerned that there is no mention of developments planned in Hart (870 dwellings at the former QE Barracks in Church Crookham and an overall total of 5,300 in Hart as a whole.	Provide complete information on housing numbers planned for Boroughs that border Farnham.	It is not considered necessary to specifically identify all neighbouring developments in the Core Strategy. Cross boundary issues are considered in more detail in the report on the Duty to Co-operate.	No change to the Plan
Cranleigh Parish Council	CSPS129	5.19	Same comment for paragraph 5.19 as 5.18 regarding transport.	Added protections for Cranleigh are required, and more attention to the impact of the proposed development on the village infrastructure, including transport.	Dialogue with Horsham District Council has not identified any significant issues. However, it is for the Horsham Plan to identify cross boundary impacts from development planned in that area and to identify any mitigation that may be required as a result. See separate report on the Duty to Co-operate.	No change to the Plan
Ms Kath Harrison Surrey County Council	CSPS270	5.19	Recommend the additional underlined wording to be included in paragraph 5.19 as follows: The analysis also acknowledges that whilst current evidence potentially over-estimates the impacts from Whitehill/Bordon, the A325 and A31 corridors in and around Farnham town centre are very sensitive to the additional traffic from strategic		Agree	Penultimate sentence of paragraph 5.19 be amended to read: "The analysis also acknowledges that whilst current evidence potentially over-estimates the impacts from

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
			<p>developments external to Waverley and would require significant highway infrastructure and public transport measures to mitigate impacts if estimated forecasts were achieved.</p>			<p>Whitehill/Bordon, the A325 and A31 corridors in and around Farnham town centre are very sensitive to the additional traffic from strategic developments external to Waverley and would require significant highway infrastructure and public transport measures to mitigate impacts if estimated forecasts were achieved."</p>
<p>Mr Alex Sciarretta Sentinel Housing Association</p>	<p>CSPS256</p>	<p>5.22</p>	<p>Paragraph 5.22 acknowledges that the release of greenfield land will be in the least sensitive locations, having regard to designations such as Green Belt and AONB. However, do not consider that the text should go on and exclude all sites that are within the AGLV designation. This incorrectly assumes that all development within the AGLV would have a detrimental impact on the landscape. It is possible to design a scheme that would not have a detrimental impact upon a sensitive landscape. In addition, the Council's basis for retention of the AGLV designation is the report undertaken by Chris Burnett Associates in 2007, which recommended an urgent review of the AONB boundary. This study is 5 years old and the Council has yet to carry out the review. Do not consider retention</p>		<p>The AGLV designation recognises the landscape value of countryside outside the AONB. The NPPF advises allocating land of the least environmental value. The Council considers that it can meet its housing requirements without the need to use AGLV land. It does not agree that the evidence base is inadequate.</p>	<p>No change to paragraph 5.22</p>

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
			of the AGLV to be justified by a robust evidence based approach. For the policy to be sound the text needs to be amended to reflect this.			
Mr Neil Cooper	CSPS177	5.23	The proposed wording states that proposals for small scale development where village boundaries are loose-knit are "limited". That is restrictive and not positive.	Planned, smaller scale, housing provision for smaller villages should be encouraged where it provides for known housing needs and where any adverse impacts can be suitably overcome or mitigated. Development of brownfield sites will be supported where the impact on neighbouring residential users will be less than the potential commercial use, and improvements through introducing landscaping will be given due weight.	Do not agree that the wording needs to be changed. This comment in paragraph 5.23 that options for development are very limited is with specific reference to the smallest loose-knit villages that do not currently have a defined settlement boundary. The proposal is that Policy CS6 will apply to these villages as well as to the villages with a defined settlement boundary. However, the comment in paragraph 5.23 is that other than affordable housing to meet local needs, other opportunities to build in the smallest and most loose-knit villages will be very limited.	No change to the Plan
Cranleigh Parish Council	CSPS130	5.25	CPC is concerned that the policy of maintaining the Green Belt without exception results in high pressure for developments in Cranleigh.	Added protections for Cranleigh are required, and more attention to the impact of the proposed development on the village infrastructure, including transport.	Noted - The Council considers that the correct approach is to exclude Green Belt land where there is scope to meet the housing requirements without the need to use the Green Belt. It is considered that this is consistent with national policy. It is not considered that the quantity of development identified at Cranleigh is disproportionate. Nor is it considered that it will have an unacceptable impact on local infrastructure.	No change to the Plan
Ms Barbara Kenward Rudgwick Parish Council	CSPS180	5.25	Development in Cranleigh should be within the defined village boundaries.		Comment noted. However, it is not possible to meet the Council's housing requirements within existing settlement boundaries. It is necessary, therefore, to release some land in the countryside to deliver the required	No change to the Plan

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
					level of new housing.	
Mr Lionel Cozens-Smith	CSPS200	5.25	Avoiding the Green Belt is too much of a restricted blanket approach. It does not accord with the NPPF paragraphs 79-92. Limited Green Belt reviews and boundary changes should be allowed for, where a need can be demonstrated. E.g. Manfield Park - on the very edge of the Green Belt, previously used Brownfield Land (See paragraph 81,83,84,85). The possibility of identifying safeguarded land should also be allowed for in the Core Strategy.	Allowing for more flexibility on a limited and demonstrated basis in Green Belts, allowing for limited alteration to the Green Belt boundaries, and allowing for the identification of 'safeguarded land' as per paragraph 85 of the NPPF, especially on the edges of the Green Belt, to enable additional employment/housing land where appropriate.	This comment deals with a specific site within the Green Belt. It is not considered that a boundary review is needed to deliver the level of housing planned in the Core Strategy. In relation to this site, it is not considered that an isolated review to exclude this site would be appropriate. In any event, paragraph 89 of the NPPF says that within the Green Belt certain forms of development are not necessarily inappropriate, including limited infilling or partial or complete redevelopment of previously developed land.	No change to the Plan
Mrs Catherine Weller	CSPS201	5.25	Avoiding the Green Belt is too much of a restricted blanket approach. It does not accord with the NPPF paragraphs 79-92. Limited Green Belt reviews and boundary changes should be allowed for, where a need can be demonstrated. E.g. Manfield Park - on the very edge of the Green Belt, previously used Brownfield Land (See paragraph 81,83,84,85). The possibility of identifying safeguarded land should also be allowed for in the Core Strategy.	Allowing for more flexibility on a limited and demonstrated basis in Green Belts, allowing for limited alteration to the Green Belt boundaries, and allowing for the identification of 'safeguarded land' as per paragraph 85 of the NPPF, especially on the edges of the Green Belt, to enable additional employment/housing land where appropriate.	This comment deals with a specific site within the Green Belt. It is not considered that a boundary review is needed to deliver the level of housing planned in the Core Strategy. In relation to this site, it is not considered that an isolated review to exclude this site would be appropriate. In any event, paragraph 89 of the NPPF says that within the Green Belt certain forms of development are not necessarily inappropriate, including limited infilling or partial or complete redevelopment of previously developed land.	No change to the Plan
Mrs Zofia Lovell South Farnham Residents Association	CSPS113	5.28	These paragraphs (Para 5.27 & 5.28) describe two possible areas for development - releases of greenfield land in the countryside or building on a brownfield site. The NPPF states that land of lesser environmental value should be used and brownfield sites	We want the Core Strategy to stress that brownfield sites will be used as a priority over greenfield land. Also Dunsfold Park must be given greater consideration for housing development as currently it is given none.	It is acknowledged that one of the parts of the NPPF indicates a preference for using brownfield land. However other considerations apply, including whether it meets the objective of sustainable development. There is a specific reference to	No change to the Plan

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
			should be used as a priority. The conclusion in para.5.27 that "some limited releases of countryside land on the edge of main settlements" is contrary to national policy. We would also question why Dunsfold Park has not been mentioned as being a possible suitable site for housing?		development of housing at Dunsfold Park. This is not a favoured location for new housing for reasons explained in the Core Strategy and Sustainability Appraisal. See more detailed response to the representations on behalf of Dunsfold Park.	
Mrs Pamela Pownall	CSPS335	5.28	Consider that the addition of housing at Dunsfold Park together with existing commercial development would be a sustainable solution, in that people could live and work without the need to travel long distances. The owner of the site is in favour of housing development and there is a great deal of land available with nearby access to the A281. Dunsfold Park should be viewed favourably for the location of new housing in preference to the uncertainty of the provision of SANG for any new building in Farnham.		See separate response to the representations from Dunsfold Park on Policies CS1 and CS2. Regarding the issue of SANG provision, the Council considers that there is enough SANG land potentially available for new housing within Farnham. Greenfield releases will be subject to identification of additional SANG and it is considered that over the period of the plan further SANG will be identified, potentially by the prospective developers/landowners, to deal with this matter.	No change to the Plan
Mrs Kathy Smyth Guildford and Waverley Friends of the Earth	CSPS271	5.29	Reference to the surplus land at Milford Hospital and its likely development for housing. This is contrasted with Dunsfold Park. View expressed that the Council has a 'blindspot' in relation to this site. Also fails to understand what does or does not make a development site sustainable.		Comment noted. The Council considers there to be differences between the approach to development of surplus land at Milford Hospital and the Dunsfold Park site, not least in terms of the scale of housing development envisaged by the owners.	No change to the Plan
Mr. j Nicholson	CSPS13	Policy CS1	Does not consider there to be any point in commenting on the Core Strategy when the Council continues to "...bulldoze the East Street Scheme on the Farnham residents and ignore their views".		Comment noted	No change to the Plan
Mr Martin	CSPS50	Policy CS1	Whilst the principle of locating new	Re-order the first three sentences in the	Consider that the policy is clear enough	No change to the Plan

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
Harrop CROUDACE STRATEGIC			development on land 'within' the four main towns (i.e. Farnham, Godalming, Haslemere and Cranleigh) is supported - i.e. the first sentence in the policy, the sentence should also include an acknowledgement that there will be some development on the 'edge' of these settlements as explained in the third sentence of the policy. It may be that the order of the first three sentences of the policy could be reorganised to make this clearer - i.e. put the third sentence after the first sentence, or revise the first sentence to read 'on land within and on the edge of' ...	policy so that the third sentence comes after the first sentence, or revise the first sentence to read ' on land within and on the edge of'	as it stands	
Mr Matthew Elliott	CSPS48	Policy CS1	This representation relates specifically to a site in Farnham. The respondent wants to protect the area of land north of the Hart in Farnham and east of Crondall Lane. Refers to the Farnham Conservation Area Appraisal and the comment about the impact that development on this land could have on the Conservation Area.		Comment noted - however, detailed site assessment will be part of the Development Management and Site Allocations DPD	No change to the Plan
Mrs Zofia Lovell South Farnham Residents Association	CSPS114	Policy CS1	Consider Policy CS1 to be unjustified. Policy CS1 says that the countryside will be protected for its own sake, whereas Policy CS2 provides for greenfield releases on land designated as Countryside Beyond the Green Belt. Council should have a phasing mechanism whereby all brownfield land is prioritised above greenfield releases. Regarding site allocations it is not reassuring to say that the Development Management and Site Allocations document will allocate any greenfield releases at a later time. Seek assurance	The Council must include in their Policy CS1 a statement to encourage the effective use of land by reusing land that has previously been developed.	Regarding use of brownfield land, see response to CSPS113. Regarding allocation of sites, there will need to be clear planning criteria for assessing the suitability of any prospective greenfield sites.	No change to the Plan

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
			that if greenfield releases have to be made they will be judged not just on availability, but also on achievability, suitability, deliverability and sustainability.			
Lamron Estates	CSPS62	Policy CS1	In order to ensure consistent interpretation, the third sentence of Policy CS1 should be amended to include "...in accordance with Policy CS2..."	An amendment to the third sentence of Policy CS1	Agreed	Third sentence of Policy CS1 be amended to read: "There will be limited releases of land on the edge of the main settlements and outside the Green Belt, AONB and AGLV, in accordance with Policy CS2."
Dr David Savage Farnham Branch Labour Party	CSPS86	Policy CS1	Consider that the Council has failed in its 'Duty to Cooperate'. The Council has not taken into account information on plans from neighbouring councils when drawing up the Plan. Council failed to take account of how its policies would affect others in neighbouring areas. Consider that it has failed to consult with neighbouring councils on the likely effects of its policies on neighbouring areas or respond to their related concerns and problems. Do not consider that the policy has been positively prepared in relation to development at Dunsfold Park. Do not consider that the Council evaluated this objectively or even handedly. Consider that the Council was looking for reasons not to develop the site. Even more important given Government announcement on importance of kick-starting infrastructure projects. Consider it is not justified as there is a	WBC should publish the issues of concern to other agencies together with actions it proposes to take to meet those concerns. In particular it should include comment related to the development of Dunsfold and WBC's proposals on the numbers of houses to be built. This action would make the DPD legally compliant in that WBC would have properly met its 'Duty to Cooperate'. The DPD should be rejected. The possibility of a significant development at Dunsfold Park should be objectively assessed by an organisation quite independent of WBC and not contracted by WBC. This investigation should also consider the latest statements by Government on the investment in infrastructure. A DPD should be drawn up which incorporates the findings of such an investigation.	Comment noted. The Council has carried out extensive work to address the duty to co-operate and this has been taken into account in developing the Core Strategy. The Core Strategy and associated sustainability appraisal demonstrate that the Council has considered the option of allowing housing at Dunsfold Park	No change to the Plan

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			more appropriate strategy, namely one including significant development at Dunsfold Park. The Council's policies do not meet the areas of housing need. A significant development at Dunsfold Park would meet those needs.			
The Garden Centre Group	CSPS96	Policy CS1	Broadly support the Council's approach to the location of new development. It meets the NPPF objective to actively manage patterns of growth by concentrating new development in the most sustainable locations. The recognition in Policy CS2 that the use of suitable rural brownfield land will need to be made in order to meet planned housing provision is welcomed. It is noted that a review of settlement boundaries and identification of appropriate sites will be undertaken as part of the Development Management and Site Allocations DPD. It is considered that the identification of appropriate brownfield land adjoining settlement boundaries is vital to ensuring that sufficient housing supply is secured over the plan period. Refer specifically to the Alfold Garden Centre and its suitability as a housing site. Consider that the development of such sites makes a significant contribution to meeting local housing need and contribute to the viability of local centres.		Comment noted: It would be inappropriate at this time to comment on the potential suitability of the specific site identified in these representations.	No change to the Plan
Cranleigh Parish Council	CSPS149	Policy CS1	Concerned that the policy of maintaining the Green Belt without exception will result in high pressure for extensive development in Cranleigh. Given the substantial amount of new housing required in Waverley, there	Added protections for Cranleigh are required, and more attention to the impact of the proposed development on the village infrastructure, including transport.	Comment noted: The Council considers that its housing requirement can be met without the need to review the boundaries of the Green Belt. It is not considered that the distribution of housing across the Borough has an	No change to the Plan

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			should be consideration of development of new settlements, rather than just extension of existing towns and villages.		unacceptable impact on Cranleigh. With regard to new settlements, the Council has previously considered this but concluded that a more appropriate and sustainable option is to focus development on the main settlements, including allowing for some greenfield releases.	
Mr Neil Cooper	CSPS178	Policy CS1	The direction of development to town centres will lead to more pressure on local roads and services such as drainage which is well known to be of concern.	While not wishing to discourage development in towns, more pro-active encouragement of planned development across smaller villages - obviously in keeping with their scale - will help to maintain rural areas and support services in those villages, while reducing the pressure in the already larger built up areas.	Comment noted: The Council considers that the most appropriate strategy is to focus most new development on the main settlements, which are the most sustainable in terms of access to services etc. There will continue to be an allowance to build within defined village boundaries as well as the continuation of a specific policy that allows for affordable housing on the edge of villages where a need has been identified. It is not considered appropriate to target villages for additional growth, having regard to other options.	No change to the Plan.
Mr Andrew Whitaker Home Builders Federation Ltd	CSPS183	Policy CS1	See also the comments in relation to Policy CS2. Regarding Policy CS1, the Federation welcomes the acknowledgement that there will be releases of land on the edge of settlements. However it is concerned about the use of the word 'limited'. Consider that there may need to be substantial releases in order to meet the forecast needs of the Borough. Consider that the use of the word 'selected' would be more appropriate. Refer to the Government announcement on housing and growth (6th September) when it stated that it would encourage councils to use the		Comments noted. Regarding the use of the word 'limited' in relation to greenfield releases, this is correct because there will have to be a limit on which sites are allocated (i.e. it is not the intention to allocate every piece of land that is promoted to the Council). However, it could be substituted with the word 'selected' as suggested. Regarding the Green Belt, the Council considers that the planned level of growth will not require any release of Green Belt land. The comment about the Local Plan is also noted. However, given the advanced stage of the Core Strategy and the Government desire to	Delete the word 'limited' in the third sentence of Policy CS1 and replace with the word 'selected'. No other changes to the Plan.

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			<p>flexibilities in the NPPF to tailor the extent of Green Belt land in their areas to reflect local circumstances. Council has decided not to assess its Green Belt boundaries, despite the planned housing being substantially less than forecast needs. Could put pressure on sensitive landscapes. Requested that the Council acknowledges that its Green Belt boundaries be reviewed if this is necessary in order to meet housing and other land use requirements. Also concerned that the Council is producing a core strategy rather than a local plan. This approach will lead to delay in the release of land and granting of planning permission for housing, as the Council is only proposing to identify and release greenfield sites through the Development Management and Site Allocations DPD. This is contrary to the Government efforts to stimulate the economy. Therefore requested that land to meet forecast needs be identified in this document, which should be re-named the Waverley Borough Local Plan.</p>		<p>get plans in place as soon as possible, the approach that Waverley is taking, along with other Council's in a similar position, is to get the Core Strategy agreed and adopted as soon as possible, accepting that specific site allocations and detailed development management policies will follow in the second document.</p>	
Mr Lionel Cozens-Smith	CSPS202	Policy CS1	<p>A Green Belt boundary review should take place to establish logical alterations, which could enable sustainable developments e.g. an extension to Manfield Park to potentially provide a sustainable employment development to cater at least in part for the proposed increase in housing in Cranleigh and the potential loss of Hewetts Industrial Estate.</p>	<p>The Green Belt boundary should be reviewed in accordance with the NPPF.</p>	<p>This comment deals with a specific site within the Green Belt. It is not considered that a boundary review is needed to deliver the level of housing planned in the Core Strategy. In relation to this site, it is not considered that an isolated review to exclude this site would be appropriate. In any event, paragraph 89 of the NPPF says that within the Green Belt certain forms of development are not necessarily inappropriate, including</p>	<p>No change to the Plan</p>

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					limited infilling or partial or complete redevelopment of previously developed land.	
Mrs Catherine Weller	CSPS203	Policy CS1	A Green Belt boundary review should take place to establish logical alterations, which could enable sustainable developments e.g. an extension to Manfield Park to potentially provide a sustainable employment development to cater at least in part for the proposed increase in housing in Cranleigh and the potential loss of Hewetts Industrial Estate.	The Green Belt boundary should be reviewed in accordance with the NPPF.	This comment deals with a specific site within the Green Belt. It is not considered that a boundary review is needed to deliver the level of housing planned in the Core Strategy. In relation to this site, it is not considered that an isolated review to exclude this site would be appropriate. In any event, paragraph 89 of the NPPF says that within the Green Belt certain forms of development are not necessarily inappropriate, including limited infilling or partial or complete redevelopment of previously developed land.	No change to the Plan
Thursley Parish Council	CSPS215	Policy CS1	Thursley Parish Council is pleased to note the intention to allow limited development within the defined settlement boundaries of the specified villages to meet local needs and to maintain the vitality of the village. We concur with the policy to maintain the Green Belt, together with the designated areas of AONB and AGLV and that the countryside outside settlements will be protected from the incursion of developments.		Comment noted	No change to the Plan
Ms Barbara Kenward Rudgwick Parish Council	CSPS235	Policy CS1	Rudgwick Parish Council agree on the soundness of expanding Cranleigh but emphasise that it should be sustainable development near to its existing centre.		Comment noted. The decision on which land around Cranleigh will be released for housing will be made through the forthcoming Development Management and Site Allocations DPD. One consideration will be the sustainability of the site in terms of access to the existing centre.	No change to the Plan

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Mr Andrew Macleod Farnham Society/Tim Cox	CSPS247	Policy CS1	See also comments made in relation to Policy CS2. Farnham Society has some anxiety about whether the duty to co-operate has been fully met and the heavy reliance on the South East Plan policies in determining particularly the overall housing provision. While it is clear that existing settlements will continue to be the major focus, meeting housing demand solely by expanding existing settlements has become untenable. Getting the balance right between what the market would like and what the area can absorb without serious damage is difficult to achieve. In relation to Farnham, the protection of the Thames Basin Heaths SPA, infrastructure overload, developments committed close to the town outside Waverley (Aldershot and Bordon) together with the national policy to give priority to brownfield sites, all means that the option of a new settlement on the airfield Dunsfold should have been considered as the Core Strategy developed. This would have taken some pressure off existing communities and provided a more robust approach, reflecting the thrust of the NPPF and also the environmental quality of the area and protection of European designated habitats.	The inclusion of a settlement at Dunsfold and the limitation of growth in existing settlements to that which can be achieved within their current settlement boundaries to achieve a more robust strategy.	The Council considers that the approach of directing development to the main settlements, including selected greenfield releases, is the most appropriate strategy. In relation to Farnham, the Council is very mindful of the developments taking place elsewhere and the specific obligations relating to the European designated site. The Council has also considered the impact of development on local infrastructure. Farnham is the largest town in Waverley with the greatest range of services. It is considered appropriate, therefore, to focus some of the growth on the town. In terms of alternatives, the Council has considered and discounted the option of directing development to Dunsfold Aerodrome.	No change top the Plan
Central Land Holdings Ltd	CSPS254	Policy CS1	Central Land Holdings Ltd object to Policy CS1; Location of Development, on the grounds that it is unsound and not consistent with national policy. The use of the term 'limited releases' of land on the edge of the main settlements, imposes a very restrictive and inflexible	It is considered that the word 'limited' should be deleted from the text of Policy CS1 in order to provide the flexibility required in the provision of suitable housing land within Waverley to help deliver the planned level of housing growth. Therefore the Text in	It is a not appropriate to allocate every greenfield site that is promoted to the Council. It follows, therefore, that the allocation will be 'limited'. However, as an alternative the word 'selected' could be used.	Amend the third sentence of Policy CS1 by replacing the word 'limited' with the word 'selected'.

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			approach to the provision of suitable housing land within Waverley to deliver the planned level of housing growth and it is against the principles set out within the National Planning Policy Framework (NPPF).	policy CS1 should be amended to the following: "There will be releases of land on the edge of the main settlements and outside the Green Belt, AONB and AGLV".		
Mr Alex Sciarretta Sentinel Housing Association	CSPS258	Policy CS1	See also comments in relation to Policies CS2 and CS15. The Core Strategy is considered to be unsound, with specific reference to policies CS1, CS2 and CS15. Regarding policy CS1, it is considered appropriate to locate most new housing development in Farnham along with the other main settlements. Note that paragraph 5.22 acknowledges that the release of greenfield land will be in the least sensitive locations, having regard to designations such as Green Belt and AONB. However, do not consider it appropriate to exclude all sites within the AGLV. This assumes that all development within the AONB would have a detrimental impact on the landscape. Consider that it is possible to design a scheme that would not have a sensitive impact. Also note the Council's reliance on the AGLV study of 2006. This recommended an urgent review of the AONB boundaries, but this review has not yet taken place. Consider the retention of the AGLV is not justified by a robust evidence base. Recommend deletion of reference to AGLV. To account for the fact that some greenfield releases will be necessary, it is also recommended that the first sentence of policy CS1 be amended to delete the words "built-up" and "within Waverley".	Amend first two sentences of Policy CS1 to read: "new development will be directed towards land within the areas of Farnham, Godalming, Haslemere and Cranleigh. These are the settlements in Waverley that are the most sustainable locations in terms of accessibility to services and facilities as well as public transport."	The AGLV designation recognises the landscape value of countryside outside the AONB. The NPPF advises allocating land of the least environmental value. The Council considers that it can meet its housing requirements without the need to use AGLV land. It does not agree that the evidence base is inadequate. Regarding the suggested change to the first sentence of Policy CS1, it is considered that development should generally be directed to land within settlements, albeit that there will also be the need to make selected greenfield releases.	No change to the Plan

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Ms Kath Harrison Surrey County Council	CSPS267	Policy CS1	No issues relating to the soundness of the Core Strategy Pre-submission Document for Waverley. However, we would suggest some further clarification would be helpful with regard to the alignment of policies C1 and C10. In addition, we would like to see some minor wording changes with regard to some of the paragraphs relating to transport, minerals and waste and flood defence.	We would suggest that some reference is made to the acceptability for new development to be included on previously developed land so that Policy CS1 can be explicitly aligned with Policy CS10 in supporting the development of previously developed land at Dunsfold Park.	Agreed - include a cross reference between policies CS1 and CS10	Insert a new paragraph before the final paragraph of Policy CS1 to read. "The Council supports the principle of the continuation and expansion of employment activity at Dunsfold Park, in accordance with Policy CS10."
Wates Developments Limited	CSPS317	Policy CS1	See also response in relation to Policy CS2. Comments on Policy CS1: As a result of the comments on and suggested changes to Policy CS2 above, the wording of Policy CS1 should be amended so that it is consistent with the suggested increased housing requirement and how this should be accommodated.	Suggested Change to Policy CS1: In terms of the release of land on the edge of the main settlements (as set out in the third sentence of the first paragraph of this policy) priority should be given to selected releases of greenfield land that is not within the Green Belt, AONB, AGLV on the edge of Godalming, Farnham and Cranleigh; and then, if there is still a need for further greenfield releases there should be selected releases of greenfield land on the edge of Godalming, Farnham, Cranleigh and Haslemere by reviewing existing Green Belt, AONB, and AGLV designations. The final sentence of the first paragraph of the policy: "The detailed identification and allocation of any greenfield releases will be through the Development Management and Site Allocations DPD" should be deleted for the reasons set out in paragraphs 4.8 and 4.9 above.	See Council's comments on the representations from this respondent to Policy CS2.	No change to the Plan.
Mr Henry Birch Notcutts Ltd	CSPS319	Policy CS1	Refer to paragraphs 5.28 and 5.29 of the Core Strategy where the Council acknowledges that there are a number of significant brownfield sites in the	Draft policy CS1 should be amended to state that, "The Green Belt will be maintained and new development in the Green Belt will be controlled in	Do not agree that the addition is required to the policy in terms of repeating what the NPPF says about the infilling/redevelopment of	No change to the Plan

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			countryside and Green Belt and that some of these may be suitable for development. However, this is not reflected in draft Policy CS1. Therefore, the policy deviates from the reasoned justification and is not consistent with the NPPF. There should be an appropriate 'hook' in the Core Strategy from which to hang any rural brownfield allocations made in the Development Management and Site Allocations DPD.	accordance with the NPPF. There will be a presumption against inappropriate development in the Green Belt. However, as confirmed in the NPPF, development may include the limited infilling or redevelopment of previously developed sites. The detailed identification and allocation of any redevelopment opportunities in urban or rural locations including land in the Green Belt will be through the Development Management and Site Allocations DPD."	previously developed sites in the Green Belt. This would simply be to repeat national policy, which is not considered necessary. The text accompanying Policy CS1 (paragraph 5.29) recognises that there may be other rural brownfield sites that could be suitable for development. Detailed consideration of these is proposed through the Development Management and Site Allocations DPD.	
Mr Cain The Homes & Communities Agency	CSPS328	Policy CS1	Reference to the Upper Tuesley site (formerly known as part of the Milford Hospital) which has the potential to deliver at least 120 residential units. Considered that as the site is of strategic importance to the emerging Core Strategy. In order for the Council's approach to housing delivery being effective and consistent with national policy, it is considered that direct reference should be to the Upper Tuesley site in Policy CS1. Also consider that an additional Core Strategy Objective should be included referring to support for the limited infilling or partial or complete redevelopment of previously developed sites within the Green Belt.	We propose that the following paragraph be inserted prior to the final paragraph of Policy CS1: "NEW DEVELOPMENT WILL BE DIRECTED TO THE UPPER TUESLEY MAJOR DEVELOPED SITE WITHIN THE GREEN BELT AS APPROPRIATE AND IN ACCORDANCE WITH THE NPPF." In the context of Delivery and Monitoring of Policy CS1 (p40), we consider that "ADOPTION OF A SUPPLEMENTARY DEVELOPMENT DOCUMENT FOR THE UPPER TUESLEY SITE" should be included under the heading of "Delivery" on p40.	Do not agree that a specific reference has to be made to the Upper Tuesley site in Policy CS1. The site is already mentioned in Policy CS2. The text accompanying Policy CS1 (paragraph 5.29) says that the Council supports the principle of developing the Upper Tuesley site in accordance with the NPPF. It also says that the Council has produced a Supplementary Planning Document (SPD), to guide development on the site. Regarding delivery, the relevant box supporting policy CS1 already refers to the application of the Upper Tuesley SPD. Regarding the proposed additional Objective, it is not considered necessary as this simply repeats what is in the NPPF.	No change to the Plan
West Cranleigh Nurseries / Knowle Park	CSPS360	Policy CS1	Reference to release of land on the edge of settlements should be consistent in policies CS1 and CS2.		It is considered that the policies are consistent as both refer to the release of land on the edge of main settlements.	In response to previous comments it has already been agreed that the word 'limited' should be replaced by the word 'selected'.

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Mr Andrew Triggs South Downs National Park Authority	CSPS388	Policy CS1	Consider there to be risk in terms of deliverability of housing. Uncertainty about capacity on land on edge of settlements; also the need to provide avoidance measures for the SPA. Designations like ASVI and the Strategic Gap are likely to constrain the availability of land around Farnham and Cranleigh. Housing needs being partly met in Aldershot and Whitehill/Bordon where the Council only has limited influence. Consider 10% non-implementation rate for planning permissions and SHLAA sites is low. Needs to be examined whether the right approach is to set a housing target lower than the South East Plan. Council will need to clarify through the Examination what level of contingency is allowed in the event that other sources of housing supply do not come forward. Important to know what degree of this element of housing is reliant on the inclusion of land within the ASVI and Strategic Gap.	Whilst it is appreciated that the Core Strategy can rely on broad locations in identifying the future supply of housing, it should be clarified that the capacity identified in and around Cranleigh and Farnham can realistically be delivered. There should be a clear commitment in Policy CS1 to release this land should monitoring identify that there is a shortfall in provision from other sources of supply. The broad locations should be shown on the key diagram, ruling out areas of the countryside that of most significant environmental and amenity value.	Detailed identification/allocation of specific greenfield sites will be through the Development Management and Site Allocations DPD. However, it is considered that there is enough evidence to show that this land is potentially available and suitable for the level of housing planned. It does not follow that the Council cannot consider land currently designated as ASVI or Strategic Gap. However, the factors that led to the inclusion of land within these designations will have to be considered alongside other relevant matters when the Council decides which sites should be allocated for housing. It is considered that there are sufficient contingencies in the Plan to deal with the implications of some sources of supply not coming forward at the rate expected.	No change to the Plan.
Mr Andrew Morris Bewley Homes Plc	CSPS393	Policy CS1	Bewley has concerns with the Council's reference in the draft Policy to 'limited' release of land on the edge of the main settlements. This reference implies a degree of restraint that is not reflected in the Council's approach to meeting its housing requirement that identifies a need for greenfield land releases to accommodate nearly 1,000 dwellings on the edge of the main settlements. Given that this equates to 1/5 of the total housing requirement for the Borough in the period up to 2028 the use of the term 'limited' seems entirely	The wording in draft Policy CS1 should be amended by the deletion of the word 'limited' from the penultimate sentence of the first paragraph.	Noted - agree to replace the word 'limited' with the word 'selected'.	Amend the third sentence of Policy CS1 by replacing the word 'limited' with the word 'selected'.

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			<p>inappropriate. In any event, the Council should ensure that draft Policy CS1 maintains flexibility to enable it to respond to any changes in the delivery rates currently envisaged from its sources of supply such that further greenfield land releases might be required.</p>			
Jackie Hutton Dockenfield Parish Council	CSPS399	Policy CS1	<p>Insufficient consideration of Bordon Ecotown impact and opportunity on west Waverley. Without reusing the old rail link to Bentley this development will have great impact on west Waverley roads via the A325 traffic and rat running. Opportunity to specifically reduce house development pressure in west Waverley by using Bordon development.</p>	<p>Include considered figure for new housing available in Bordon from this brownfield site [along with the others that are mentioned in the document.]</p>	<p>Whilst it is considered that some of the new housing at Whitehill/Bordon will inevitably meet the needs of some who might otherwise be looking for housing in Waverley, it has not been possible to reach formal agreement with East Hampshire DC to off-set a specific amount of Waverley's housing needs.</p>	<p>No change to policy CS1 in response to this representation.</p>
Taylor Wimpey Strategic Land	CSPS406	Policy CS1	<p>The comments on behalf of Taylor Wimpey are largely concerned with housing matters and are, therefore, summarised and addressed mainly in the schedule of responses to Chapter 6 and Policy CS2 in particular. In relation to Policy CS1, the following comments are relevant: The strong relative skew for development towards the four main towns, and Farnham in particular, is entirely right in spatial strategy terms - where the soundness of both policies falls down is the fact that a) the housing development allowances are far too low b) too great a proportion of development has to lie within the existing settlements; and c) much of that development is unidentified in anyevent. On the distribution question, it is right that the Waverley Settlement Hierarchy as elucidated at CS Para 5.15,</p>		<p>The Council's response to the Taylor Wimpey comments is largely set out in the Schedule for Chapter 6 and Policy CS2 in particular. The comments relevant to Policy CS1 are also noted. In particular, the reference to the local designation of 'Area of Strategic Visual Importance'. The Council considers that there is justification to retain this designation pending review through the Development Management and Site Allocations DPD. Given that the Core Strategy does not identify and allocate specific sites, it does not rule out consideration of sites affected by local designations, when the Council comes to make these detailed assessments. In considering the relative merits of the potential greenfield sites, the Council will clearly need to take account of any local</p>	<p>No specific changes to Policy CS1 in response to these representations.</p>

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			with the focus on the four 'Communities with Key Services', is included. It is also appropriate, for the most part, to avoid Green Belt, AONB & AGLV (e.g. CS paras 5.22) provided sufficient sustainable development can be provided outside these areas. Finally, it is right that Farnham even with it being within 5k of SPA has to continue to thrive. Farnham at its 36,000 population is the most sustainable settlement in Waverley. Proper planning and pragmatism means that it has to grow. The CS approach to the plethora of landscape designations, and most particularly the extraordinary "Areas of Strategic Visual Importance" are not backed by an evidence base, not shown to be necessary to aid positive outcomes of the plan and not in line with the national policy aim to bring clarity and simplicity to the planning system. The CS, insofar as landscape designations is concerned, also fails the tests of soundness.		designations alongside other matters relevant to the allocation of individual sites.	
Martin Grant Homes Ltd Martin Grant Homes Ltd	CSPS409	Policy CS1	The representations on behalf of Martin Grant Homes largely relate to the amount and location of housing. The comments are mainly addressed in the Schedule for Chapter 6. In relation to the distribution of development the respondents have argued that with innovative solutions development within areas currently designated as Green Belt could provide sustainable development without material harm to the character or appearance of the area. In particular the respondents have made the case for allocating a site	In relation to Policy CS1, it is argued that this should be amended to include limited releases of land within the Green Belt, AONB and AGLV.	The Council's main response to the representations from Martin Grant Homes is set out in the responses to comments on Chapter 6 and Policy CS2 in particular. In relation to the issue of Green Belt, AONB and AGLV, the Council considers that the housing requirements can be met without the need to either review the Green belt or seek changes to the AONB and AGLV designations. It is recognised that this limits the opportunities for development in areas covered by these designations. However, it is	No change to policy CS1 in response to these representations.

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			<p>at Sturt Road/Hedgehog Lane in Haslemere and land at Lower Mousehill Lane in Milford. It is argued that this approach could potentially release land around Milford and other second category settlements as defined in the Council's Settlement Hierarchy. It is not considered that Policy CS1 is the most appropriate strategy when considered against reasonable alternatives. In addition to the Green Belt it is also argued that the Council should review the AONB and AGLV boundaries to improve the balance in terms of addressing the need for new homes in Waverley. It is argued that housing need will not be met as it is restricted by an overly restrictive view on the release of land adjacent to highly sustainable settlements. It is not considered that the Council has investigated whether any adverse impacts arising from extensions to existing settlements covered by these designations would outweigh the benefits of increased housing supply in Waverley.</p>		<p>considered correct to focus on areas that are not within the Green Belt and also not within these defined landscape designations and that such an approach is consistent with the NPPF and the South East Plan.</p>	
<p>Bloor Homes Bloor Homes</p>	<p>CSPS412</p>	<p>Policy CS1</p>	<p>See also the representations from Bloor Homes and the Council's response in the separate schedule relating to Chapter 6 and Policy CS2 in particular. In relation to Policy CS1, it is argued that the rural brownfield site known as the former Weyburn Works should be specifically identified as a Major Developed Site in the Green Belt. It is argued that Policy CS1 should expressly refer to housing delivery through redevelopment of Major Developed</p>	<p>Amend Policy CS1 to expressly refer to housing delivery through Major Developed Sites in the Green Belt.</p>	<p>In relation to the comments on Policy CS1, it is not considered necessary to specifically refer to sites such as this in Policy CS1. This policy sets the broad strategy. Not all rural brownfield site, whether in the Green belt or not, will automatically be suitable. Therefore the proposed approach of looking at individual sites through the Development Management and Site Allocations DPD is correct. In addition, given the changes to Government</p>	<p>No change to Policy CS1 in response to these representations.</p>

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
			<p>Sites, including the former Weyburn Works.</p> <p>It is also argued that Elstead (the closest village to the Weyburn Works site) is a sustainable rural settlement, with a range of facilities. It is also argued that the site is close to four railway stations.</p>		<p>policy on the Green belt in the NPPF, it is no longer a specific requirement to designate Major Developed Sites.</p>	
First Wessex	CSPS417	Policy CS1	<p>The locations proposed for development have been restricted on the basis of lowering the housing numbers through concentration on land supply alone rather than a balanced assessment of need and supply. The Authority is encouraged to go back to first principles and set a higher housing target that will enable them to address the affordability issues within the Borough in a realistic and meaningful way, based on a balanced assessment of supply and need. To keep the housing target artificially low to avoid having to develop within the countryside, review the Green Belt or allow for redevelopment of employment sites is unsound.</p>	<p>Increase the housing numbers being planned for and review the overall strategic approach.</p>	<p>These representations mainly relate to the number of new homes being planned for and are addressed in Chapter 6 and policy CS2 in particular.</p>	<p>No change to policy CS1 in response to these representations.</p>
Mr Jerry Hyman	CSPS423	Policy CS1	<p>The representations from Mr Hyman are summarised and addressed in the Schedule relating to Chapter 15: 'Biodiversity and Geological Conservation.'</p>	<p>See summary of My Hyman's comments in relation to Chapter 15.</p>	<p>See response to Mr Hyman's comments in relation to Chapter 15.</p>	<p>See response to Mr Hyman's comments in relation to Chapter 15.</p>
Mr Matthew Pardoe Signet Planning	CSPS446	Policy CS1	<p>The overall approach set out within Policy CS1 is supported and deemed to be sound, particularly the thrust that new development should be diverted towards land within the built-up areas of Farnham, Godalming, Haslemere and Cranleigh (Paragraph 1). The stance that the Green Belt will be maintained and</p>	<p>The Policy should be maintained as drafted apart from the third sentence, which should read; "sufficient land on the edge of main settlements and outside the Green Belt, AONB and AGLV will be released in accordance with the requirements of Policy CS2".</p>	<p>Agree in part. The word 'limited' could be replace by the word 'selected'.</p>	<p>Amend the third sentence of Policy CS1 by replacing the word 'limited' with the word 'selected'.</p>

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
<p>new development there-in controlled in accordance with the NPPF, is also deemed to be sound. However, reference to 'limited releases' suggests that the Council will not objectively release the land that will be required in order to meet its housing targets (which are expressed as a minimum requirement by Policy CS2). As the Council has accepted that greenfield land will need to be released in order to meet its housing requirement the Core Strategy needs to have the flexibility required to achieve this objective.</p>						
Dunsfold Park Ltd	CSPS466	Policy CS1	<p>See also the representations from Dunsfold Park on Policy CS2. Dunsfold Park consider :</p> <p>The Core Strategy as drafted is fundamentally unsound; It is based on an incomplete, limited and dated evidence base that does not appropriately consider alternative strategies and scenarios; The Sustainability Appraisal (SA) is flawed and inadequate for the reasons set out in the LUC report; The overall strategy for the Borough is not justified and is not effective; Joint working and positive preparation, in conjunction with neighbouring authorities, as required by the NPPF, has not taken place; Alternative scenarios, including but not limited to comprehensive development at Dunsfold Aerodrome, have not been appropriately considered; Overall, the Strategy has not been positively prepared, is not justified, is not effective, and is not consistent with</p>	<p>It would be necessary to go back a stage and undertake a full and robust SA of genuine alternatives. This needs to be based on effective joint working with neighbouring local authorities. Policies CS1 and CS2 need to be re-written once the SA has been done fully and comprehensively. Overall the housing target is too low, has not been justified and would lead to an ineffective Plan. Evidence such as the Housing Needs and Market Assessment is either dated or cannot be considered a product of collaboration and joint working. Housing and employment levels should be considered in the light of need and demand not just with the Borough, but in the light of potential delivery or undersupply in neighbouring authorities. Dunsfold Aerodrome and other alternatives have not been fully and properly considered as part of the SA.</p>	<p>The Council's main response to the representations from Dunsfold Park is set out in the responses to comments on Chapter 6 and Policy CS2 in particular. The Council does not agree that there has not been a proper assessment of alternative locations for development. The Council is mindful of the conclusions of the Secretary of State concerning prematurity. The Council has considered and dismissed the option of building a new settlement compared with the preferred approach of greenfield releases on the edge of the main settlements. It stands by the conclusion that it would be preferable to meet its housing requirements in this way. Whilst the specific allocation of sites is not part of the Core Strategy, evidence shows a number of locations on the edge of Farnham and Cranleigh where development would be more closely integrated with the settlement and with easier access to local facilities</p>	<p>No change to Policy CS1 in response to these representations.</p>

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
			<p>national policy. The Core Strategy is considered to have failed and to be unsound because it has not given appropriate consideration to potential alternatives for the location and quantum of new homes, and is not sufficiently flexible. The Council has not conducted a credible Sustainability Appraisal (SA) or evaluation of the alternative options for housing delivery, nor an examination or assessment of neighbouring authorities.</p> <p>The review of the SA by LUC concludes: Elements of the SA are not legally compliant;</p> <p>Issues over the quantum and location of housing have not been properly assessed;</p> <p>No evidence of appropriate engagement/co-operation with neighbouring authorities in respect of housing delivery and other matters;</p> <p>None of the options in the SA include actual locations which means that its conclusions are speculative and uncertain. The SA has not been carried out consistently and objectively.</p> <p>Absence of a proper analysis of housing need is a particular failing of the SA and the Core Strategy itself. Policy CS1 fails to consider locations for development of new homes where considerable development already exists, but is outside the four main settlements, including Dunsfold Aerodrome. There is a failure to recognise that housing and employment development can enhance the sustainability of Dunsfold Aerodrome. No comparison or sustainability assessment has taken</p>		<p>etc. The Council also considered the suggestion of delivering a smaller number of homes at Dunsfold Park. Whilst the quantum of development would be less, there would still be the issue of having to travel away from the site to access a full range of services etc.</p>	

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
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place on this basis. There is a reference to the 2008 new settlement appeal and the fact that one of the reasons for rejection was prematurity, indicating that Dunsfold Aerodrome should be considered alongside other alternatives. No proper consideration of alternatives has take place. No comprehensive comparison of Dunsfold Aerodrome against the effects of alternatives of where greenfield releases might take place. Refer to the accompanying report by Lord Taylor which concludes that there are options for a range of scales of mixed use development that would have significant sustainability benefits and advantages. These alternative options have not been meaningfully considered by the Council. There has been no consideration of a different quantum of housing, or a different form of development. The strategy is not justified oreffective. It is considered that the employment uses at Dunsfold Aerodrome would benefit in sustainability terms from the introduction of housing. Consider that the Council has failed to address the issue of cross boundary housing need and demand. No material evidence of joint working or co-operation on issues around housing need, demand and delivery. As a result, the Plan has not been positively prepared or justified as the most appropriate strategy. The Plan cannot be effective in terms of cross boundary strategic priorities. The Plan is not, therefore, consistent with national policy.

6. The Amount and Location of Housing

Name/Organisation	Mrs Celia Sandars
Representation Number	CSPS81
Paragraph/ Policy	6.1
Summary of Representation	1) There is no phasing policy to require development of Brownfield sites before Greenfield sites. 2) Waverley should consider Dunsfold as a major site, mitigating the pressure on Farnham which does not have the infrastructure for new housing
Changes Proposed by Representation	
Council Response	1) Current evidence on deliverable sites shows a shortfall between what is expected to be delivered on potential housing sites within settlements and on rural brownfield land, and the overall target. Therefore, there is a 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. 2) It is not considered that the planned strategy requires a new settlement of the size previously proposed at Dunsfold Park. Even a lower level of development (such as 500 or 1,000 homes) would still be likely to result in an unsustainable development. 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.
Implications for Core Strategy	No Change

Name/Organisation	Mr Andrew Macleod Farnham Society/Tim Cox
Representation Number	CSPS297
Paragraph/ Policy	6.1
Summary of Representation	1) There is no phasing policy prioritising Brownfield over Greenfield.
Changes Proposed by Representation	
Council Response	1) Current evidence on deliverable sites shows a shortfall between what is expected to be delivered on potential housing sites within settlements and on rural brownfield land, and the overall target. Therefore, there is a 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.
Implications for Core Strategy	No Change

Name/Organisation	Mr Cain The Homes & Communities Agency
Representation Number	CSPS322
Paragraph/ Policy	6.1
Summary of Representation	1) Need to clarify what development of previously developed land within the Green Belt is by adding a new line at the end of penultimate sentence of 6.1.
Changes Proposed by Representation	Add line to clarify as mentioned in summary, 'more limited development directed towards the villages and at appropriate previously developed sites within the Greenbelt, principally to meet local needs'

Council Response	1) Criterion 4 of Policy CS2 states that the additional homes provided by the Policy will be delivered by the use of suitable rural brownfield land. Brownfield land is defined in the Glossary
Implications for Core Strategy	No change

Name/Organisation	West Cranleigh Nurseries / Knowle Park
Representation Number	CSPS361
Paragraph/ Policy	6.1
Summary of Representation	1) Land adjacent to settlements should be considered for housing.
Changes Proposed by Representation	
Council Response	1) The Core Strategy provides the framework for identifying specific greenfield releases. One requirement of Policy CS2 is that they are on the edge of (i.e. adjacent to) the settlement boundary.
Implications for Core Strategy	No change to paragraph 6.1.

Name/Organisation	Mr Chris Marks Sturt Farm Ltd
Representation Number	CSPS207
Paragraph/ Policy	6.7
Summary of Representation	1) The trajectory is not plausible. No windfalls are included for 2011/2012 -to 2014/2015. The increase in housing projected does not tally with the trend that shows a drop in completions. Greenfield allocations will not suddenly be built evenly and then suddenly stop. Post 2022 delivery has not been fully considered. Reliance on windfall sites is excessive and should be compensated by further Greenfield releases. SHLAA sites are not robust and should be discounted.
Changes Proposed by Representation	
Council Response	1) Historically many of the new homes that have been built in the Borough have been on windfall sites. Paragraph 48 of the NPPF states that Councils may make an allowance for windfall sites in the five year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Therefore, a windfall allowance based on past completions has been included in the Council's housing supply. The allowance however takes a precautionary approach and discounts the past completion rates by 25% in the event that the supply from this source is less than planned and to take account of the approach to garden land in paragraph 53 of the NPPF. Windfalls have not been included in the first three years of the Core Strategy (2012 to 2015) in order to avoid the risk of double counting with homes that already have planning permission. Policy CS2 also makes it clear that additional greenfield sites will be identified and held in reserve. They could then be considered for releases if evidence clearly shows that other sources of supply are not coming forward. Including potential housing sites identified in the SHLAA is in accordance with Paragraph 47 of the NPPF. This states that the Council should identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing supply. The amount of housing from this source has been discounted by 10% to allow for non implementation. It is recognised that the rate of completions on greenfield sites may in reality be different but for the purposes of the housing trajectory an estimate of 194/193 a year from 2017/18 for five years is a realistic assessment of the delivery from this source over this period.
Implications for Core Strategy	No change

Name/Organisation	Monkhill Ltd
Representation Number	CSPS211
Paragraph/ Policy	6.7

Summary of Representation	1) The trajectory is not plausible. No windfalls are included for 2011/2012 -to 2014/2015. The increase in housing projected does not tally with the trend that shows a drop in completions. Greenfield allocations will not suddenly be built evenly and then suddenly stop. Post 2022 delivery has not been fully considered. Reliance on windfall sites is excessive and should be compensated by further Greenfield releases. SHLAA sites are not robust and should be discounted.
Changes Proposed by Representation	
Council Response	1) Historically many of the new homes that have been built in the Borough have been on windfall sites. Paragraph 48 of the NPPF states that Councils may make an allowance for windfall sites in the five year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Therefore, a windfall allowance based on past completions has been included in the Council's housing supply. The allowance however takes a precautionary approach and discounts the past completion rates by 25% in the event that the supply from this source is less than planned and to take account of the approach to garden land in paragraph 53 of the NPPF. Windfalls have not been included in the first three years of the Core Strategy (2012 to 2015) in order to avoid the risk of double counting with homes that already have planning permission. Policy CS2 also makes it clear that additional greenfield sites will be identified and held in reserve. They could then be considered for releases if evidence clearly shows that other sources of supply are not coming forward. Including potential housing sites identified in the SHLAA is in accordance with Paragraph 47 of the NPPF. This states that the Council should identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing supply. The amount of housing from this source has been discounted by 10% to allow for non implementation. It is recognised that the rate of completions on greenfield sites may in reality be different but for the purposes of the housing trajectory an estimate of 194/193 a year from 2017/18 for five years is a realistic assessment of the delivery from this source over this period.
Implications for Core Strategy	No change

Name/Organisation	West Cranleigh Nurseries / Knowle Park
Representation Number	CSPS362
Paragraph/ Policy	6.12
Summary of Representation	1) There is no justification for not meeting the need for affordable homes just because Waverley is an attractive place to live.
Changes Proposed by Representation	
Council Response	1) The 230 dwellings per annum in Policy CS2 is the figure that was contained in the South East Plan before it was increased by the Secretary of State on the recommendation of the Examination in Public Panel. The Council considers that the approach strikes the right balance between delivering new homes needed in the area whilst recognising the rural character of the area and the various constraints including the Green Belt, landscape designations and biodiversity designations which together with limitations on access to services and public transport, restrict the suitability of land to accommodate new homes in a sustainable way.
Implications for Core Strategy	No change

Name/Organisation	Lamron Estates
Representation Number	CSPS63
Paragraph/ Policy	6.13
Summary of Representation	1) There is no justification for providing 230 homes, below the 250 in the tested South East plan contrary to the evidence in the SHMA.
Changes Proposed by Representation	
Council Response	1) Waverley is not within any 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. It is also considered that there is a reasonable case to revert to the South East Plan Option 1 figure of 230 homes a year 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.

Implications for Core Strategy	No change
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Name/Organisation	Miss Susan Carroll
Representation Number	CSPS162
Paragraph/ Policy	6.13
Summary of Representation	1) Land at St Georges Road in Badshot Lea (ID475) should be considered further for housing development as it is within 100 metres of the settlement boundary and adjacent to the village hall, only separated by another area of land that is an 'acceptable' SHLAA site. Site ID 381 is to be considered further but is in multi ownership, its centre is further from the settlement boundary and its size (aggregate of three sites) will spatially unbalance the distribution of housing and on a consistent basis. Rejecting site 475 prevents the potential for sequential development.
Changes Proposed by Representation	
Council Response	1) Comment noted. The detailed assessment/allocation of sites will be through the Development Management and Site Allocations DPD. One of the criteria is that sites should be adjacent to settlement boundaries to minimise encroachment into the countryside.
Implications for Core Strategy	No change

Name/Organisation	West Cranleigh Nurseries / Knowle Park
Representation Number	CSPS363
Paragraph/ Policy	6.13
Summary of Representation	1) Contrary to NPPF, there is no evidence of joint working and co-operating with other Local Planning Authorities. It is not positive plan making. 2) The potential of Greenfield sites should have been analysed before the housing figure was arrived at.
Changes Proposed by Representation	
Council Response	1) The Council's Duty to Cooperate Report sets out how the Council has liaised and worked with other Local Planning Authorities on its Core Strategy. 2) The 230 dwellings per annum in Policy CS2 is the figure that was contained in the South East Plan before it was increased by the Secretary of State on the recommendation of the Examination in Public Panel. The Council considers that the approach strikes the right balance between delivering new homes needed in the area whilst recognising the rural character of the area and the various constraints including the Green Belt, landscape designations and biodiversity designations which together with limitations on access to services and public transport, restrict the suitability of land to accommodate new homes in a sustainable way.
Implications for Core Strategy	No change

Name/Organisation	Cranleigh Parish Council Cranleigh Parish Council
Representation Number	CSPS131
Paragraph/ Policy	6.14
Summary of Representation	1) Adopting a figure of 230 which is below the SE plan runs the risk of not being found sound, which consequently could result in unrestricted development in Cranleigh. Need to look at protecting Cranleigh and the impact of the proposed development.
Changes Proposed by Representation	
Council Response	1) Waverley is not within any 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. It is also considered that there is a reasonable case to revert to the South East Plan Option 1 figure of 230 homes a year 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.

Implications for Core Strategy	No change
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Name/Organisation	Mr Alex Sciarretta Sentinel Housing Association
Representation Number	CSPS262
Paragraph/ Policy	6.14
Summary of Representation	1) The Core Strategy relies too heavily on development on garden land, which has now been removed from the definition of previously developed land and will therefore be more difficult.
Changes Proposed by Representation	
Council Response	1) Historically many of the new homes that have been built in the Borough have been on windfall sites. Paragraph 48 of the NPPF states that Councils may make an allowance for windfall sites in the five year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Therefore, a windfall allowance based on past completions has been included in the Council's housing supply. The allowance however takes a precautionary approach and discounts the past completion rates by 25% in the event that the supply from this source is less than planned and to take account of the approach to garden land in paragraph 53 of the NPPF. Windfalls have not been included in the first three years of the Core Strategy (2012 to 2015) in order to avoid the risk of double counting with homes that already have planning permission. Policy CS2 also makes it clear that additional greenfield sites will be identified and held in reserve. They could then be considered for release if evidence clearly shows that other sources of supply are not coming forward.
Implications for Core Strategy	No change

Name/Organisation	West Cranleigh Nurseries / Knowle Park
Representation Number	CSPS364
Paragraph/ Policy	6.14
Summary of Representation	1) Contrary to NPPF, there is no evidence of joint working and co-operating with other Local Planning Authorities. It is not positive plan making. 2) Development in villages to meet local needs is premature as local assessments of need have not taken place.
Changes Proposed by Representation	
Council Response	1) The Council's Duty to Cooperate Report sets out how the Council has liaised and worked with other Local Planning Authorities on its Core Strategy. 2) The Core Strategy directs development to within and on the edge of the built up areas of the Borough's main settlements because these are the most sustainable locations. However, policies also permit small scale development within the rural villages that have an existing defined settlement boundary to meet local needs and to maintain the vitality of the village. Furthermore where a local need has been identified, affordable housing schemes on the edge of villages may be permitted under Policy CS6.
Implications for Core Strategy	No change

Name/Organisation	Mrs Zofia Lovell South Farnham Residents Association
Representation Number	CSPS115
Paragraph/ Policy	6.15
Summary of Representation	1) The Core Strategy does not indicate the number of surplus homes that can meet Waverley's needs from a neighbouring Local Planning Authorities. There is no mention of

	Queen Elizabeth Barracks development at Church Crookham and in Fleet.
Changes Proposed by Representation	
Council Response	1) It is not possible to quantify a specific number of homes that will be provided in neighbouring areas and that will meet some of Waverley's needs, as there is no formal agreement with adjoining authorities to this effect. However, given the overlap of housing markets, it is reasonable to identify, as a matter of fact, the major development planning close to Waverley and whether they are in excess of the South East Plan requirements.
Implications for Core Strategy	No change

Name/Organisation	Jenny Rickard Surrey Heath Borough Council
Representation Number	CSPS221
Paragraph/ Policy	6.15
Summary of Representation	1) Waverley is not providing for a continuous 15 year housing supply and undelivering by 750 homes, contrary to South East Plan and NPPF. The Core Strategy should accord with the South East Plan for the period 2006 - 2029. 2) It is not meeting fully objectively assessed needs. No viable SHMA based target has been identified. 3) It is unreasonable for Waverley to rely on other neighbouring Local Planning Authorities as these LPAs have unmet need.
Changes Proposed by Representation	
Council Response	1) Waverley is not within any 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. It is also considered that there is a reasonable case to revert to the South East Plan Option 1 figure of 230 homes a year 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. 2) The 230 dwellings per annum in Policy CS2 is the figure that was contained in the South East Plan before it was increased by the Secretary of State on the recommendation of the Examination in Public Panel. The Council considers that the approach strikes the right balance between delivering new homes needed in the area whilst recognising the rural character of the area and the various constraints including the Green Belt, landscape designations and biodiversity designations which together with limitations on access to services and public transport, restrict the suitability of land to accommodate new homes in a sustainable way. 3) It is not possible to quantify a specific number of homes that will be provided in neighbouring areas and that will meet some of Waverley's needs, as there is no formal agreement with adjoining authorities to this effect. However, given the overlap of housing markets, it is reasonable to identify, as a matter of fact, the major development planning close to Waverley and whether they are in excess of the South East Plan requirements.
Implications for Core Strategy	No change

Name/Organisation	Mr Alex Sciarretta Sentinel Housing Association
Representation Number	CSPS265
Paragraph/ Policy	6.15
Summary of Representation	1) Waverley should not rely on neighbouring Local Planning Authorities to meet its own housing need. 2) Windfalls should not include private gardens and be discounted by 50% rather than 25%.
Changes Proposed by Representation	
Council Response	1) It is not possible to quantify a specific number of homes that will be provided in neighbouring areas and that will meet some of Waverley's needs, as there is no formal agreement with adjoining authorities to this effect. However, given the overlap of housing markets, it is reasonable to identify, as a matter of fact, the major development planning close to Waverley and whether they are in excess of the South East Plan requirements.

2) Historically many of the new homes that have been built in the Borough have been on windfall sites. Paragraph 48 of the NPPF states that Councils may make an allowance for windfall sites in the five year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Therefore, a windfall allowance based on past completions has been included in the Council's housing supply. The allowance however takes a precautionary approach and discounts the past completion rates by 25% in the event that the supply from this source is less than planned and to take account of the approach to garden land in paragraph 53 of the NPPF. Windfalls have not been included in the first three years of the Core Strategy (2012 to 2015) in order to avoid the risk of double counting with homes that already have planning permission. Policy CS2 also makes it clear that additional greenfield sites will be identified and held in reserve. They could then be considered for release if evidence clearly shows that other sources of supply are not coming forward.

Implications for Core Strategy	No change
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Name/Organisation	Cranleigh Consortium
Representation Number	CSPS44
Paragraph/ Policy	6.16
Summary of Representation	<p>1) There is no justification for having 230 dwellings per annum, a figure lower than the South East Plan.</p> <p>2) The Sustainability Appraisal should have specifically tested the 250 dwellings per annum in the South East Plan figure if there was concern about its environmental impact.</p> <p>3) As there is capacity on suitable sites then the approach to strike a balance between environmental and housing need is not sound.</p>
Changes Proposed by Representation	
Council Response	<p>1) Waverley is not within any 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. It is also considered that there is a reasonable case to revert to the South East Plan Option 1 figure of 230 homes a year 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> <p>2) It is considered that the SA itself, together with the various version of the Core Strategy, has demonstrated how the Council has considered reasonable alternatives.</p> <p>3) The 230 dwellings per annum in Policy CS2 is the figure that was contained in the South East Plan before it was increased by the Secretary of State on the recommendation of the Examination in Public Panel. The Council considers that the approach strikes the right balance between delivering new homes needed in the area whilst recognising the rural character of the area and the various constraints including the Green Belt, landscape designations and biodiversity designations which together with limitations on access to services and public transport, restrict the suitability of land to accommodate new homes in a sustainable way.</p>
Implications for Core Strategy	No change

Name/Organisation	Miss Susan Carroll
Representation Number	CSPS163
Paragraph/ Policy	6.16
Summary of Representation	<p>1) Land at St Georges Road in Badshot Lea (ID475) should be considered further for housing development as it is within 100 metres of the settlement boundary and adjacent to the village hall, only separated by another area of land that is an 'acceptable' SHLAA site. Site ID 381 is to be considered further but is in multi ownership, its centre is further from the settlement boundary and its size (aggregate of three sites) will spatially unbalance the distribution of housing and on a consistent basis. Rejecting site (id 475) prevents the potential for sequential development.</p>
Changes Proposed by Representation	

Council Response	1) Comment noted. The detailed assessment/allocation of sites will be through the Development Management and Site Allocations DPD. One of the criteria is that sites should be adjacent to settlement boundaries to minimise encroachment into the countryside.
Implications for Core Strategy	No change

Name/Organisation	West Cranleigh Nurseries / Knowle Park
Representation Number	CSPS365
Paragraph/ Policy	6.17
Summary of Representation	1) Waverley needs compelling, robust evidence that windfalls will continue to emerge and will not dry up - is there double counting with SHLAA? To offset non delivery of windfall additional greenfield sites should be planned.
Changes Proposed by Representation	
Council Response	1) Historically many of the new homes that have been built in the Borough have been on windfall sites. Paragraph 48 of the NPPF states that Councils may make an allowance for windfall sites in the five year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Therefore, a windfall allowance based on past completions has been included in the Council's housing supply. The allowance however takes a precautionary approach and discounts the past completion rates by 25% in the event that the supply from this source is less than planned and to take account of the approach to garden land in paragraph 53 of the NPPF. Windfalls have not been included in the first three years of the Core Strategy (2012 to 2015) in order to avoid the risk of double counting with homes that already have planning permission. Policy CS2 also makes it clear that additional greenfield sites will be identified and held in reserve. They could then be considered for release if evidence clearly shows that other sources of supply are not coming forward.
Implications for Core Strategy	No change

Name/Organisation	Michael Conoley Michael Conoley Associates
Representation Number	CSPS382
Paragraph/ Policy	6.17
Summary of Representation	1) Waverley need to take into account the NPPF which states that a windfall allowance should not include gardens.
Changes Proposed by Representation	
Council Response	1) Historically many of the new homes that have been built in the Borough have been on windfall sites. Paragraph 48 of the NPPF states that Councils may make an allowance for windfall sites in the five year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Therefore, a windfall allowance based on past completions has been included in the Council's housing supply. The allowance however takes a precautionary approach and discounts the past completion rates by 25% in the event that the supply from this source is less than planned and to take account of the approach to garden land in paragraph 53 of the NPPF. Windfalls have not been included in the first three years of the Core Strategy (2012 to 2015) in order to avoid the risk of double counting with homes that already have planning permission. Policy CS2 also makes it clear that additional greenfield sites will be identified and held in reserve. They could then be considered for release if evidence clearly shows that other sources of supply are not coming forward.
Implications for Core Strategy	No change

Name/Organisation	Cranleigh Parish Council Cranleigh Parish Council
Representation Number	CSPS132
Paragraph/ Policy	6.19
Summary of Representation	1) As an employment site, Dunsfold Park should be considered for appropriate housing

	development matched to need of the industry located there.
Changes Proposed by Representation	
Council Response	1) It is not considered that the planned strategy requires a new settlement of the size previously proposed at Dunsfold Park. Even a lower level of development (such as 500 or 1,000 homes) would still be likely to result in an unsustainable development. 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.
Implications for Core Strategy	No change

Name/Organisation	Miss Susan Carroll
Representation Number	CSPS164
Paragraph/ Policy	6.19
Summary of Representation	1) Land at St Georges Road in Badshot Lea (ID475) should be considered further for housing development as it is within 100 metres of the settlement boundary and adjacent to the village hall, only separated by another area of land that is an 'acceptable' SHLAA site. Site ID 381 is to be considered further but is in multi ownership, its centre is further from the settlement boundary and its size (aggregate of three sites) will spatially unbalance the distribution of housing and on a consistent basis. Rejecting site 475 prevents the potential for sequential development.
Changes Proposed by Representation	
Council Response	1) Comment noted. The detailed assessment/allocation of sites will be through the Development Management and Site Allocations DPD. One of the criteria is that sites should be adjacent to settlement boundaries to minimise encroachment into the countryside.
Implications for Core Strategy	No change

Name/Organisation	Farnham Town Council Farnham Town Council
Representation Number	CSPS304
Paragraph/ Policy	6.19
Summary of Representation	1) The Core Strategy is unsound and unbalanced as it does not include an element of housing at Dunsfold which is an appropriate site, being the Borough's largest employment site. 2) Releasing greenfield sites near to other settlements such as Farnham which does not have the public transport infrastructure to make it easy to access employment in the settlement is inappropriate. Consider Dunsfold for housing before releasing sites on the outskirts of Farnham.
Changes Proposed by Representation	
Council Response	1) It is not considered that the planned strategy requires a new settlement of the size previously proposed at Dunsfold Park. Even a lower level of development (such as 500 or 1,000 homes) would still be likely to result in an unsustainable development. 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. 2) Farnham is the largest settlement in Waverley and the most sustainable in terms of the range of services, employment opportunities and access to public transport. Evidence does not indicate insurmountable problems in relation to infrastructure even taking into account planned developments outside Waverley.
Implications for Core Strategy	No change

Name/Organisation	Lamron Estates
Representation Number	CSPS64

Paragraph/ Policy	6.22
Summary of Representation	1) The Windfalls component is too high and is also double counted as the SHLAA included sites of 1 - 4 units (net).
Changes Proposed by Representation	
Council Response	1) Historically many of the new homes that have been built in the Borough have been on windfall sites. Paragraph 48 of the NPPF states that Councils may make an allowance for windfall sites in the five year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Therefore, a windfall allowance based on past completions has been included in the Council's housing supply. The allowance however takes a precautionary approach and discounts the past completion rates by 25% in the event that the supply from this source is less than planned and to take account of the approach to garden land in paragraph 53 of the NPPF. Windfalls have not been included in the first three years of the Core Strategy (2012 to 2015) in order to avoid the risk of double counting with homes that already have planning permission. Policy CS2 also makes it clear that additional greenfield sites will be identified and held in reserve. They could then be considered for releases if evidence clearly shows that other sources of supply are not coming forward. The sites within settlements identified potentially for housing in the SHLAA only includes sites that have a potential yield of five additional dwellings.
Implications for Core Strategy	No change

Name/Organisation	Mrs Zofia Lovell South Farnham Residents Association
Representation Number	CSPS116
Paragraph/ Policy	Table 6.1
Summary of Representation	1) Table 6.1 shows a housing target of 12 houses per annum for the villages (less than the 13 p.a. shown in the draft Core Strategy). With approximately 80 villages in Waverley, this allowance of 12 annually does not ensure the viability of the villages. The housing figure should be higher. 2) For clarity under section D, there should be separate figure quoted for "existing planning permissions" and "sites identified in the SHLAA"
Changes Proposed by Representation	To ensure the viability of the villages, Waverley should expect the 80 villages to provide more than 12 houses in total per year.
Council Response	1) The Core Strategy directs development to within and on the edge of the built up areas of the Borough's main settlements because these are the most sustainable locations. However, policies also permit small scale development within the rural villages that have an existing defined settlement boundary to meet local needs and to maintain the vitality of the village. The figure of 12 new homes a year is not a specific figure for the village to plan for but an estimate of what may come forward from this source. The estimate is based on past trends of housing completions from the rural settlements from 2001 to 2012 following a discount of 25%. Furthermore where a local need has been identified, affordable housing schemes on the edge of villages may be permitted under Policy CS6. An amount has therefore also been estimated for rural exception sites in addition to the 12 homes a year within the settlements. 2) The breakdown of the sources of supply that make up Section D of Table 6.1 are derived from the SHLAA (before discounting). However, a breakdown can be included in the Core Strategy to make it clearer.
Implications for Core Strategy	Change Section D of Table 6.1 to show estimated supply from Existing Planning Permissions 814 Sites identified in the SHLAA 975 (Base Date April 2012)

Name/Organisation	West Cranleigh Nurseries / Knowle Park
Representation Number	CSPS366
Paragraph/ Policy	Table 6.1

Summary of Representation	1) Objection is raised to the table 6.1 on the grounds that it does not set out to provide sufficient housing and is overly reliant on assumptions about windfall sites.
Changes Proposed by Representation	
Council Response	<p>1) The 230 dwellings per annum in Policy CS2 is the figure that was contained in the South East Plan before it was increased by the Secretary of State on the recommendation of the Examination in Public Panel. The Council considers that the approach strikes the right balance between delivering new homes needed in the area whilst recognising the rural character of the area and the various constraints including the Green Belt, landscape designations and biodiversity designations which together with limitations on access to services and public transport, restrict the suitability of land to accommodate new homes in a sustainable way.</p> <p>2) Historically many of the new homes that have been built in the Borough have been on windfall sites. Paragraph 48 of the NPPF states that Councils may make an allowance for windfall sites in the five year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Therefore, a windfall allowance based on past completions has been included in the Council's housing supply. The allowance however takes a precautionary approach and discounts the past completion rates by 25% in the event that the supply from this source is less than planned and to take account of the approach to garden land in paragraph 53 of the NPPF. Windfalls have not been included in the first three years of the Core Strategy (2012 to 2015) in order to avoid the risk of double counting with homes that already have planning permission. Policy CS2 also makes it clear that additional greenfield sites will be identified and held in reserve. They could then be considered for releases if evidence clearly shows that other sources of supply are not coming forward.</p>
Implications for Core Strategy	No change

Name/Organisation	Mr John Kelly Berkeley Strategic
Representation Number	CSPS438
Paragraph/ Policy	Table 6.1
Summary of Representation	1) The Core Strategy relies too heavily on windfall sites, which amounts to 24% of the total housing provision which is not a positively prepared plan. The amount of windfall sites is therefore not justified.
Changes Proposed by Representation	
Council Response	1) Historically many of the new homes that have been built in the Borough have been on windfall sites. Paragraph 48 of the NPPF states that Councils may make an allowance for windfall sites in the five year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Therefore, a windfall allowance based on past completions has been included in the Council's housing supply. The allowance however takes a precautionary approach and discounts the past completion rates by 25% in the event that the supply from this source is less than planned and to take account of the approach to garden land in paragraph 53 of the NPPF. Windfalls have not been included in the first three years of the Core Strategy (2012 to 2015) in order to avoid the risk of double counting with homes that already have planning permission. Policy CS2 also makes it clear that additional greenfield sites will be identified and held in reserve. They could then be considered for releases if evidence clearly shows that other sources of supply are not coming forward.
Implications for Core Strategy	No change

Name/Organisation	Mr John Andrews
Representation Number	CSPS55
Paragraph/ Policy	6.23
Summary of Representation	1) Cranleigh does not have suitable transport infrastructure to provide access to employment
Changes Proposed by Representation	Treat Cranleigh as an exceptional village and limit housing growth to levels commensurate with local employment opportunities plus local population growth.

Council Response	1) It is acknowledged that Cranleigh is the smallest of the four main settlements in the Borough and it does not have a railway station. However, it does have access to other public transport, a wide range of services and good employment opportunities. As the countryside adjoining the edge of the village settlement is not within the Green Belt, AONB and AGLV it is considered that there is the potential for limited releases of land on the edge of Cranleigh to contribute to meeting the Borough overall target. Discussions with infrastructure providers, including the Highways Authority, have not identified any insurmountable infrastructure issues in Cranleigh.
Implications for Core Strategy	No change

Name/Organisation	Lamron Estates
Representation Number	CSPS65
Paragraph/ Policy	6.23
Summary of Representation	1) Supports approach to Greenfield land release.
Changes Proposed by Representation	
Council Response	1) Support noted
Implications for Core Strategy	No change

Name/Organisation	West Cranleigh Nurseries / Knowle Park
Representation Number	CSPS367
Paragraph/ Policy	6.23
Summary of Representation	1) The approach to Greenfield releases supported but consider the amount from this source should be revised upwards.
Changes Proposed by Representation	
Council Response	1) The 230 dwellings per annum in Policy CS2 is the figure that was contained in the South East Plan before it was increased by the Secretary of State on the recommendation of the Examination in Public Panel. The Council considers that the approach strikes the right balance between delivering new homes needed in the area whilst recognising the rural character of the area and the various constraints including the Green Belt, landscape designations and biodiversity designations which together with limitations on access to services and public transport, restrict the suitability of land to accommodate new homes in a sustainable way.
Implications for Core Strategy	No change

Name/Organisation	Mrs Zofia Lovell South Farnham Residents Association
Representation Number	CSPS454
Paragraph/ Policy	6.23
Summary of Representation	1) The SPA affects where housing should go. 2) There is no need for greenfield releases when Dunsfold Park is available.
Changes Proposed by Representation	Include the SPA as a third factor influencing decisions on releasing greenfield sites.
Council Response	1) 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 the housing needs arising in the largest settlement. Agreed measures are in place to provide avoidance/mitigation measures, such that housing in Farnham would not have an adverse impact on the SPA. 2) It is not considered that the planned strategy requires a new settlement of the size previously proposed at Dunsfold Park. Even a lower level of development (such as 500 or 1,000 homes) would still be likely to result in an unsustainable development. 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.

Implications for Core Strategy	No change
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Name/Organisation	Mr Clive Smith
Representation Number	CSPS31
Paragraph/ Policy	6.24
Summary of Representation	1) Accords with the NPPF in giving great weight to conserving and protecting the AONB. It also accords with the Surrey Hills Management Plan 2009-14.
Changes Proposed by Representation	
Council Response	Support noted
Implications for Core Strategy	No change

Name/Organisation	Lamron Estates
Representation Number	CSPS66
Paragraph/ Policy	6.26
Summary of Representation	1) The need for ASVI and the Strategic Gap designations have not been established.
Changes Proposed by Representation	
Council Response	1) The Farnham/Aldershot Strategic Gap designation does not add a further layer of control. Instead it seeks to protect the Gap from inappropriate development through the application of Local Plan Policy C2, as well as promoting enhancement of landscape and conservation of wildlife sites; and promoting improved public footpaths and bridleways. It has played an important role in preventing coalescence of Farnham and Aldershot. The ASVI designation is considered to play an important role in protecting the character of existing settlements, by preventing coalescence of settlements or protecting open land which penetrates urban areas and acting as 'green lung'.
Implications for Core Strategy	No change

Name/Organisation	Miss Susan Carroll
Representation Number	CSPS165
Paragraph/ Policy	6.26
Summary of Representation	1) Land at St Georges Road in Badshot Lea (ID475) should be considered further for housing development as it is within 100 metres of the settlement boundary and adjacent to the village hall, only separated by another area of land that is an 'acceptable' SHLAA site. Site ID 381 is to be considered further but is in multi ownership, its centre is further from the settlement boundary and its size (aggregate of three sites) will spatially unbalance the distribution of housing and on a consistent basis. Rejecting site ID 475 prevents the potential for sequential development.
Changes Proposed by Representation	
Council Response	1) Comment noted. The detailed assessment/allocation of sites will be through the Development Management and Site Allocations DPD. One of the criteria is that sites should be adjacent to settlement boundaries to minimise encroachment into the countryside
Implications for Core Strategy	No change

Name/Organisation	Cranleigh Consortium
Representation Number	CSPS45
Paragraph/ Policy	6.27
Summary of Representation	1) The approach to distributing greenfield release between Farnham and Cranleigh is supported (and Furze Lane) but it should not be an equal split. The approach should be to balance the distribution of the total housing overall between the two settlements taking

	into account existing permissions, completions and SHLAA sites. This means that Farnham has been allocated the most, although it is more constrained by the SPA, Strategic Gap and ASVI.
Changes Proposed by Representation	Increase housing number allocated to Cranleigh so that they have equal numbers overall of 1036. Re-adjust the greenfield releases accordingly.
Council Response	1) Given the size of Cranleigh and in recognition of some of the constraints around Farnham it is considered that a 50:50 split in terms of the greenfield releases is appropriate. Policy CS2 sets out the full distribution of homes for each settlement taking into account the number of dwellings already completed, those already with planning permission or those from sites identified as potentially suitable for housing. Farnham is the largest settlement in Waverley and the most sustainable in terms of the range of services, employment opportunities and access to public transport. Evidence does not indicate insurmountable problems in relation to infrastructure even taking into account planned developments outside Waverley. Agreed measures are in place to provide avoidance/mitigation measures, such that housing in Farnham would not have an adverse impact on the SPA.
Implications for Core Strategy	No change

Name/Organisation	Lamron Estates
Representation Number	CSPS67
Paragraph/ Policy	6.27
Summary of Representation	1) Supports the identification of Farnham as a main focus for new housing
Changes Proposed by Representation	
Council Response	Support noted
Implications for Core Strategy	No change

Name/Organisation	West Cranleigh Nurseries / Knowle Park
Representation Number	CSPS368
Paragraph/ Policy	6.27
Summary of Representation	1) Although the approach to greenfield releases is correct, as the SHLAA is not a robust assessment, the potential from greenfield releases is not justified.
Changes Proposed by Representation	
Council Response	1) Including potential housing sites identified in the SHLAA is in accordance with Paragraph 47 of the NPPF. This states that the Council should identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing supply. The amount of housing from this source has been discounted by 10% to allow for non implementation. It is recognised that some greenfield releases are required. The Core Strategy indicates broadly where these should be (i.e. adjacent to main settlements and outside the GB, AONB and AGLV). Detailed identification and allocation will be proposed through the Development Management and Site Allocations DPD.
Implications for Core Strategy	No change

Name/Organisation	Mrs Zofia Lovell South Farnham Residents Association
Representation Number	CSPS455
Paragraph/ Policy	6.27
Summary of Representation	1) Farnham has 2 SPAs whereas Cranleigh has less. 2) If sites are needed in the area then neighbouring Local Planning Authorities should provide new homes
Changes Proposed by Representation	The Core Strategy should accept the constraints that the SPA imposes on development in Farnham. Any imbalance should be taken up by providing homes in neighbouring

	boroughs.
Council Response	1) 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 the housing needs arising in the largest settlement. Agreed measures are in place to provide avoidance/mitigation measures, such that housing in Farnham would not have an adverse impact on the SPA. Natural England have not raised any concerns over the adequacy of Farnham Park as a SANG. It is recognised that to deliver the planned greenfield releases around Farnham further SANG will be required. However, it is considered that over the period of the Plan and informed by the site selection process; additional SANG to serve these greenfield releases will be identified. 2) It is not possible to quantify a specific number of homes that will be provided in neighbouring areas and that will meet some of Waverley's needs, as there is no formal agreement with adjoining authorities to this effect. However, given the overlap of housing markets, it is reasonable to identify, as a matter of fact, the major development planning close to Waverley and whether they are in excess of the South East Plan requirements.
Implications for Core Strategy	No change

Name/Organisation	Mr Neville Carter TBRA
Representation Number	CSPS168
Paragraph/ Policy	6.28
Summary of Representation	1) Natural England have "stated" not "identified" the zonal format. The evidence to support the format has been described as weak and refuted by leading avian researchers.
Changes Proposed by Representation	
Council Response	1) In Natural England's opinion the approach to the SPA in the Core Strategy is sound.
Implications for Core Strategy	No change

Name/Organisation	Mrs Zofia Lovell South Farnham Residents Association
Representation Number	CSPS456
Paragraph/ Policy	6.29
Summary of Representation	1) The Council should not be confident that additional SANG to meet the number of new homes proposed for Farnham will come forward unless they can provide evidence of these additional sites.
Changes Proposed by Representation	Waverley must produce what evidence they have that SANG capacity will indeed come forward in the future to support the required housing.
Council Response	1) Natural England have not raised any concerns over the adequacy of Farnham Park as a SANG. It is recognised that to deliver the planned greenfield releases around Farnham further SANG will be required. However, it is considered that over the period of the Plan and informed by the site selection process; additional SANG to serve these greenfield releases will be identified.
Implications for Core Strategy	No change

Name/Organisation	Cranleigh Parish Council Cranleigh Parish Council
Representation Number	CSPS133
Paragraph/ Policy	6.30
Summary of Representation	1) Concerned that the Core Strategy is too weak to limit the level of development in Cranleigh and should identify the limits.
Changes Proposed by Representation	Added protections for Cranleigh are required and more attention to the impact of the proposed development on the village infrastructure, including transport.
Council Response	1) The 230 dwellings per annum in Policy CS2 is the figure that was contained in the South East Plan before it was increased by the Secretary of State on the recommendation of the

Examination in Public Panel. The Council considers that the approach strikes the right balance between delivering new homes needed in the area whilst recognising the rural character of the area and the various constraints including the Green Belt, landscape designations and biodiversity designations which together with limitations on access to services and public transport, restrict the suitability of land to accommodate new homes in a sustainable way. It is acknowledged that Cranleigh is the smallest of the four main settlements in the Borough and it does not have a railway station. However, it does have access to other public transport, a wide range of services and good employment opportunities. As the countryside adjoining the edge of the village settlement is not within the Green Belt, AONB and AGLV it is considered that there is the potential for limited releases of land on the edge of Cranleigh to contribute to meeting the Borough overall target.

Implications for Core Strategy	No change
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Name/Organisation	Mrs Zofia Lovell South Farnham Residents Association
Representation Number	CSPS457
Paragraph/ Policy	6.30
Summary of Representation	1) If there is a need to "balance" the overall strategy then Farnham's housing need could be met by new homes proposed in neighbouring Local Planning Authorities.
Changes Proposed by Representation	Farnhams housing needs could be met through the use of the extra homes that the developments abutting Farnham will provide.
Council Response	1) It is not possible to quantify a specific number of homes that will be provided in neighbouring areas and that will meet some of Waverley's needs, as there is no formal agreement with adjoining authorities to this effect. However, given the overlap of housing markets, it is reasonable to identify, as a matter of fact, the major development planning close to Waverley and whether they are in excess of the South East Plan requirements.
Implications for Core Strategy	No change

Name/Organisation	Heather Twizell Natural England
Representation Number	CSPS351
Paragraph/ Policy	6.31
Summary of Representation	1) The Core Strategy is considered sound although paragraph 6.31 is incorrect because the words "Appropriate Assessment" should be "Habitats Regulations Assessment". The wording should be in line with paragraph 15.26 of the Core Strategy. These comments should not affect Natural England's obligations to advise on proposals which subsequently arise from this or later versions of the plan and which may have adverse effects on the environment.
Changes Proposed by Representation	
Council Response	1) Agree that the wording of paragraph 6.31 of the Core Strategy should be changed so that it is consistent with paragraph 15.26.
Implications for Core Strategy	Change last two sentences of Paragraph 6.31 to state " However, there is still the risk that development could impact on this SPA and therefore the evidence collated for the Core Strategy's Habitats Regulations Assessment (HRA) recommends that any new housing located within 400 metres of the Wealden Heaths Phase I and II SPA will be required to carry out a project level HRA as part of the planning application process".

Name/Organisation	Mrs Zofia Lovell South Farnham Residents Association
Representation Number	CSPS458
Paragraph/ Policy	6.31
Summary of Representation	1) The SHLAA identifies land on the Southern fringe for development but this would still threaten the SPA at Hankley Common. Wealden Heath SPA should be given the same protection as the Thames Basin Heath SPA.

Changes Proposed by Representation	The Wealden Heath SPA be given the same protection as that awarded to the Thames Basin Heath SPA
Council Response	1) Natural England support the approach to Wealden Heaths I and II SPA, although they consider a change to the wording of Paragraph 6.31 should be made to to be consistent with Paragraph 15.26 as it refers to a the need for a project level HRA for any new housing within 400 m of the SPA.
Implications for Core Strategy	No change

Name/Organisation	Mr Cain The Homes & Communities Agency
Representation Number	CSPS325
Paragraph/ Policy	6.33
Summary of Representation	
Changes Proposed by Representation	At the end of paragraph 6.3 we consider that the words " Aside from any identified major developed sites within the green belt" should be added.
Council Response	1) There is no longer a definition of Major Developed Sites in the national planning guidance as there was in PPG2. The approach to suitable rural brownfield land is clearly set out in Paragraph 6.19 and Criterion 4 of Policy CS2. There is no need for further qualification in the Core Strategy.
Implications for Core Strategy	No change

Name/Organisation	A Dovey
Representation Number	CSPS23
Paragraph/ Policy	Policy CS2
Summary of Representation	1) I do not think that the roads in Cranleigh can accommodate extra traffic produced by 800 new homes.
Changes Proposed by Representation	
Council Response	1) It is acknowledged that Cranleigh is the smallest of the four main settlements in the Borough and it does not have a railway station. However, it does have access to other public transport, a wide range of services and good employment opportunities. As the countryside adjoining the edge of the village settlement is not within the Green Belt, AONB and AGLV it is considered that there is the potential for limited releases of land on the edge of Cranleigh to contribute to meeting the Borough overall target. Discussions with infrastructure providers, including the Highways Authority, have not identified any insurmountable infrastructure issues in Cranleigh.
Implications for Core Strategy	No change

Name/Organisation	Mr Anthony Harrow
Representation Number	CSPS29
Paragraph/ Policy	Policy CS2
Summary of Representation	1) Fewer residences for Cranleigh unless it is Greenfield sites
Changes Proposed by Representation	
Council Response	1) It is acknowledged that Cranleigh is the smallest of the four main settlements in the Borough and it does not have a railway station. However, it does have access to other public transport, a wide range of services and good employment opportunities. As the countryside adjoining the edge of the village settlement is not within the Green Belt, AONB and AGLV it is considered that there is the potential for limited releases of land on the edge of Cranleigh to contribute to meeting the Borough overall target.
Implications for Core Strategy	No change

Name/Organisation	Mr Clive Smith
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Representation Number	CSPS32
Paragraph/ Policy	Policy CS2
Summary of Representation	1) The approach to Greenfield sites outside the Greenbelt, AONB or AGLV is supported but the words "sites" should be added after "Greenfield" and the words "on land " removed after Cranleigh.
Changes Proposed by Representation	
Council Response	1) Support noted. A minor wording change is necessary to ensure the policy is clear.
Implications for Core Strategy	Minor wording change to Policy CS2 (2) to read "Selected releases of greenfield sites on the edge of the four main settlements of Farnham, Godalming, Haslemere and Cranleigh on land that is not with in the Green Belt....."

Name/Organisation	Mr Martin Harrop CROUDACE STRATEGIC
Representation Number	CSPS49
Paragraph/ Policy	Policy CS2
Summary of Representation	1) Supports the identification of Furze Lane for housing.
Changes Proposed by Representation	
Council Response	1) Support noted
Implications for Core Strategy	No change

Name/Organisation	Cranleigh Consortium
Representation Number	CSPS47
Paragraph/ Policy	Policy CS2
Summary of Representation	1) The approach to Greenfield sites outside of the Green Belt, AONB and AGLV is supported but Cranleigh should be distributed more as Farnham is more constrained by the SPA, ASVI and Strategic Gap. 2) Supports the identification of additional greenfield sites as reserve sites which can be released if there is evidence that the housing target is not being achieved especially as it is uncertain that new SANG will be delivered.
Changes Proposed by Representation	Increase provision of new housing at Cranleigh to at least Farnham level to reduce reliance on Farnham and Allow time for SANG to be delivered.
Council Response	1) Farnham is the largest settlement in Waverley and the most sustainable in terms of the range of services, employment opportunities and access to public transport. Evidence does not indicate insurmountable problems in relation to infrastructure even taking 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 the housing needs arising in the largest settlement. Agreed measures are in place to provide avoidance/mitigation measures, such that housing in Farnham would not have an adverse impact on the SPA. 2) Support welcomed. Natural England have not raised any concerns over the adequacy of Farnham Park as a SANG. It is recognised that to deliver the planned greenfield releases around Farnham further SANG will be required. However, it is considered that over the period of the Plan and informed by the site selection process; additional SANG to serve these greenfield releases will be identified.
Implications for Core Strategy	No change

Name/Organisation	Mr P R Shelton
Representation Number	CSPS54
Paragraph/ Policy	Policy CS2
Summary of Representation	1) Agrees that we need more housing but we need to strike the right balance with the

	future of the environment (Green Belt etc).
Changes Proposed by Representation	
Council Response	1) The 230 dwellings per annum in Policy CS2 is the figure that was contained in the South East Plan before it was increased by the Secretary of State on the recommendation of the Examination in Public Panel. The Council considers that the approach strikes the right balance between delivering new homes needed in the area whilst recognising the rural character of the area and the various constraints including the Green Belt, landscape designations and biodiversity designations which together with limitations on access to services and public transport, restrict the suitability of land to accommodate new homes in a sustainable way.
Implications for Core Strategy	No change

Name/Organisation	Lamron Estates
Representation Number	CSPS68
Paragraph/ Policy	Policy CS2
Summary of Representation	1) The restriction of "no more than 967 new homes" on greenfield Land is inappropriate, unnecessary and inflexible. It will not allow the Council to respond to changing circumstances. The policy text should simply state that Brownfield sites will be given priority, as per NPPF guidance.
Changes Proposed by Representation	
Council Response	1) Based on historic rates of housing delivery and current evidence of deliverable housing sites, including windfall sites, it is considered more than likely that housing delivery over the whole Plan period will exceed the target set out in the Core Strategy. The housing trajectory also demonstrates 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 additional greenfield sites will be identified but held in reserve to be brought forward in accordance with Policy CS2.
Implications for Core Strategy	No change

Name/Organisation	Ms Louise Piper Rushmoor Borough Council
Representation Number	CSPS78
Paragraph/ Policy	Policy CS2
Summary of Representation	1) The Core Strategy provided for 230 dwellings per annum, less than the South East Plan requirements. 2) The Core Strategy does not identify the location or scale of the greenfield release around Farnham which is the nearest settlement to Rushmoor. This is contrary to the NPPF which states that broad locations for strategic development should be indicated on a key diagram. Therefore it is difficult to ascertain the impact on Rushmoor. 3) The Core Strategy states that there is not enough mitigation measures including SANG to take place on Greenfield sites around Farnham and therefore the Strategy is not deliverable. 4) The additional homes in excess of the South East Plan provided by Rushmoor will go towards meeting its own housing needs. If Rushmoor is to meet Waverley housing needs then Waverley should also meet Rushmoor's. Waverley have failed to effectively work jointly with Rushmoor regarding cross boundary housing needs.
Changes Proposed by Representation	1) Deletion of reference to housing at the AUE meeting the needs of Waverley Borough; paragraph 5.17, paragraph 5.18 and paragraph 6.15 2) Identification of the broad locations of the Greenfield site allocation around Farnham on the key diagram 3) Certainty regarding the ability to mitigate the impact of the proposed development on the TBH SPA.
Council Response	1) Waverley is not within any 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. It is also considered that there is a reasonable case to revert to the South East Plan Option 1 figure

of 230 homes a year 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.

2) 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 and development allocations should be made in a subsequent DPD which will identify specific sites for housing. The Core Strategy does provide clarity about how the Council will meet its housing requirements and Policy CS2 clearly sets out the broad location for development within the Borough and the number of homes in each location.

3) Natural England have not raised any concerns over the adequacy of Farnham Park as a SANG. It is recognised that to deliver the planned greenfield releases around Farnham further SANG will be required. However, it is considered that over the period of the Plan and informed by the site selection process; additional SANG to serve these greenfield releases will be identified.

4) The Council's Duty to Cooperate Report sets out how the Council has liaised and worked with other Local Planning Authorities on its Core Strategy. It is not possible to quantify a specific number of homes that will be provided in neighbouring areas and that will meet some of Waverley's needs, as there is no formal agreement with adjoining authorities to this effect. However, given the overlap of housing markets, it is reasonable to identify, as a matter of fact, the major development planning close to Waverley and whether they are in excess of the South East Plan requirements.

Implications for Core Strategy	No change
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Name/Organisation	Dr David Savage Farnham Branch Labour Party
Representation Number	CSPS87
Paragraph/ Policy	Policy CS2
Summary of Representation	1) Waverley has failed in its Duty to Cooperate because it has failed to properly consult with neighbouring Local Planning Authorities on the likely effect of its policies on them. 2) The Core Strategy has not been positively prepared as it has not objectively evaluated Dunsfold Park especially regarding the need to kick start infrastructure projects and to meeting housing need in the South East.
Changes Proposed by Representation	1) Waverley should publish the issues of concern to other agencies in particular regarding developing Dunsfold, which should be objectively assessed by a body independent of Waverley.
Council Response	1) The Council's Duty to Cooperate Report sets out how the Council has liaised and worked with other Local Planning Authorities on its Core Strategy. 2) It is not considered that the planned strategy requires a new settlement of the size previously proposed at Dunsfold Park. Even a lower level of development (such as 500 or 1,000 homes) would still be likely to result in an unsustainable development. 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.
Implications for Core Strategy	No change

Name/Organisation	Mark Mathews Thames Water Plc
Representation Number	CSPS92
Paragraph/ Policy	Policy CS2
Summary of Representation	1) Without specific location and phasing of development sites it is difficult for Thames Water to comment on the proposed development number. However the number is in line with the South East Plan and the Thames Water's high level plans. 2) Although Thames Water supports distribution to the 4 main settlement within those areas, sites should be located where capacity already exists within its infrastructure. If not, then sites should only be allocated if it can be shown that capacity can be provided. Farnham: preferred location in the vicinity of the STW in the NE of Farnham. Godalming: preferred location in the vicinity of the STW in the NE of the settlement. Haslemere preferred location in the vicinity of the STW in the west of the settlement. Cranleigh: preferred location in vicinity of STW in west of settlement.

	<p>3) Water supply - Resources exist to serve the amount planned although upgrades should be anticipated. There is no need for specific locations as water supplies under pressure.</p> <p>4) Infrastructure delivery - local schemes can take from 18 months to 3 years. Strategic solutions 3 to 5 years. It is easier to provide infrastructure for a small number of large clearly defined sites than for a large number of smaller less well defined sites.</p>
Changes Proposed by Representation	Amend policy CS4 as suggested in separate representation. Such a specific water/sewerage policy reference is important as sewerage and water undertakers have limited powers under the water industry act to prevent connection ahead of infrastructure upgrades and therefore rely heavily on the planning system to ensure infrastructure is provided ahead of development either through phasing or the use of Grampian style conditions.
Council Response	1) It has been noted that the comments from Thames Water do not object to the approach to housing in the Core Strategy. The specific points about infrastructure provision will be considered in more detail when the work on the Development Management and Site Allocation DPD progresses.
Implications for Core Strategy	No change

Name/Organisation	Mr Daniel Hawes Hart District Council
Representation Number	CSPS94
Paragraph/ Policy	Policy CS2
Summary of Representation	1) Hart would expect that the amount of new home should meet the South East Plan requirement of 250 dwellings per annum. Therefore the Core Strategy is not in conformity with the South East Plan. As an adjoining Local Planning Authority, Hart is likely to face increased pressure for new homes on greenfield sites to meet the shortfall in Waverley's provision
Changes Proposed by Representation	The housing provision in the Core Strategy should be increased to a level that would better meet Waverley's locally assessed needs and at least to an annual figure of 250 homes per year to ensure general conformity with the South East Plan.
Council Response	1) Waverley is not within any 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. It is also considered that there is a reasonable case to revert to the South East Plan Option 1 figure of 230 homes a year 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.
Implications for Core Strategy	No change

Name/Organisation	The Garden Centre Group
Representation Number	CSPS97
Paragraph/ Policy	Policy CS2
Summary of Representation	<p>1) Welcomes Policy CS1 as focussing on new development on existing centres of population.</p> <p>2) Alfold Garden Centre welcomes the recognition that that use of suitable rural brownfield land can help meet the housing provision. Alfold Garden Centre is a rural Brownfield site adjoining an existing settlement boundary and its development would meet the objectives of Policy CS1 and will be promoted as a potential housing site in the subsequent DPD. It is noted that a review of settlement boundaries and allocations will be part of subsequent DPD.</p>
Changes Proposed by Representation	
Council Response	<p>1) Support noted.</p> <p>2) Policy CS2 recognises that some rural brownfield land may contribute to meeting housing requirements.</p>
Implications for Core Strategy	No change

Name/Organisation	Ms Sarah West
Representation Number	CSPS98
Paragraph/ Policy	Policy CS2
Summary of Representation	<p>1) The provision of 230 dwellings per annum, below the South East Plan target is not justified by evidence that the target can not be met unless it is inconsistent with sustainable development. The shortfall will increase pressure on Chichester and other neighbouring Local Planning Authorities to provide additional homes. The Core Strategy makes no allowance for development pressure arising from the designation of the South Downs National Park.</p> <p>2) Waverley has amended the Core Strategy as a result of Chichester's previous comments on the Core Strategy but they have not been fully addressed in terms of justifying a reduced housing target or in co-operation with neighbouring Local Planning Authorities to meet Waverley's housing needs.</p>
Changes Proposed by Representation	
Council Response	<p>1) Waverley is not within any 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. It is also considered that there is a reasonable case to revert to the South East Plan Option 1 figure of 230 homes a year 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> <p>2) The Council's Duty to Cooperate Report sets out how the Council has liaised and worked with other Local Planning Authorities on its Core Strategy.</p>
Implications for Core Strategy	No change

Name/Organisation	Cranleigh Parish Council Cranleigh Parish Council
Representation Number	CSPS151
Paragraph/ Policy	Policy CS2
Summary of Representation	1) Cranleigh Parish Council is concerned at the impact of building 836 new houses in Cranleigh over the plan period and is opposed to this number.
Changes Proposed by Representation	Added protections for Cranleigh are required and more attention to the impact of the proposed development on the village infrastructure, including transport.
Council Response	1) It is acknowledged that Cranleigh is the smallest of the four main settlements in the Borough and it does not have a railway station. However, it does have access to other public transport, a wide range of services and good employment opportunities. As the countryside adjoining the edge of the village settlement is not within the Green Belt, AONB and AGLV it is considered that there is the potential for limited releases of land on the edge of Cranleigh to contribute to meeting the Borough overall target.
Implications for Core Strategy	No change

Name/Organisation	Mr Andrew Whitaker Home Builders Federation Ltd
Representation Number	CSPS184
Paragraph/ Policy	Policy CS2
Summary of Representation	<p>1) Since the last consultation the NPPF and initial information from the 2011 census have been published. However the Core Strategy states that it is in accordance with the NPPF when it clearly is not. The Core Strategy states that it is to provide housing to meet those issues identified in previous consultations and to deliver the spatial vision. However the role for the Council is to produce a local plan in accordance with the NPPF - that is to boost significantly the supply of housing and to objectively assess their housing needs. The Council needs to properly assess housing need and provide for it. This will show a requirement of 10,500 dwellings. An inadequate provision of 5,060 dwellings will result in social problems and force families to move.</p> <p>2) The Government's statement on the need to stimulate the economy strengthens the HBFs concerns as the Council is unwilling to confront the issues and will only accept an</p>

amount of new housing that is not environmentally damaging. An inadequate provision of 5,060 dwellings will detrimentally affect the economy due to labour shortages.

3) They can only avoid problems by relying on neighbouring authorities to accommodate their shortfall which has not been done.

4) The Council needs to consider where new housing should go and consider reassessing its existing Green Belt boundaries to meet increased provision. It needs to be clearer where the locations should be and given that the Council may know what sites are to be allocated then sites should be identified now.

Changes Proposed by Representation

Council Response

1) The 230 dwellings per annum in Policy CS2 is the figure that was contained in the South East Plan before it was increased by the Secretary of State on the recommendation of the Examination in Public Panel. The Council considers that the approach strikes the right balance between delivering new homes needed in the area whilst recognising the rural character of the area and the various constraints including the Green Belt, landscape designations and biodiversity designations which together with limitations on access to services and public transport, restrict the suitability of land to accommodate new homes in a sustainable way. Waverley is an attractive place to live which explains the strong demand for market housing. Evidence of demand is 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. Evidence indicates that historically migration trends vary widely year on year, so care is needed in seeking to project how these trends will affect local population growth over the extended period of the Plan

2) The update to the Employment Land Review 2011 examined three different scenarios of employment demand growth over the period 2010 to 2027 to establish the amount of employment land to plan for: high growth, base demand and low growth. It then considered the housing implications of each scenario. Under the high growth scenario, Waverley would require 249 dwellings per year to accommodate the increase in the Borough's B use class employment over the period 2010 to 2027. Under the base scenario it would require 190 new homes a year and under the low growth scenario it would require 133 new homes a year. This analysis is based on a series of assumptions regarding levels of commuting, economic activity, unemployment rates and household size. The Employment Land Review recommends that the base scenario is the most appropriate scenario for Core Strategy policies to be based on. As indicated elsewhere, in setting the local housing target, a balance needs to be struck between the social, economic and environmental considerations.

3) The Council's Duty to Cooperate Report sets out how the Council has liaised and worked with other Local Planning Authorities on its Core Strategy. It is not possible to quantify a specific number of homes that will be provided in neighbouring areas and that will meet some of Waverley's needs, as there is no formal agreement with adjoining authorities to this effect. However, given the overlap of housing markets, it is reasonable to identify, as a matter of fact, the major development planning close to Waverley and whether they are in excess of the South East Plan requirements.

4) One of the core planning principles under Paragraph 17 of the NPPF states that allocations of land for development should prefer land of lesser environmental value where consistent with other policies in the framework. Paragraph 83 of the NPPF states that once established, Green Belt boundaries should be altered in exceptional circumstances. Paragraph 115 says that great weight should be given to conserving landscape and scenic beauty in AONBs. Evidence shows that there is enough land outside the Green Belt, AONB and AGLV in the Borough where development is not constrained by other factors to meet the anticipated need for greenfield releases. Therefore there is no need to release land that does not meet the criteria for greenfield releases in Policy CS2.

Implications for Core Strategy

See updated paragraph 6.11

Name/Organisation	Mr Chris Marks Sturt Farm Ltd
Representation Number	CSPS204
Paragraph/ Policy	Policy CS2
Summary of Representation	1) The amount of housing is inadequate to meet housing needs. Waverley's target is based on capacity rather than meeting housing need. The decline in housing construction

means that the delivery of housing to meet needs is low

2) The proposed location is flawed and unbalanced and allows for incremental and opportunistic growth only. No strategic spatial framework is provided for the growth and evolution of the main settlements. Haslemere has not been adequately considered and the allocation is inadequate. The location of housing is not based on where the need is but on the opportunity for new housing based on constraints. Farnham has environmental issues whereas Cranleigh has poor transport links and poor access to services and jobs other than by car. The approach is based on constraints and relies on rural brownfield sites and sites peripheral to the main towns that may not be successfully integrated and accessed.

3) There is no justification for 230 dwellings per annum, below the South East Plan.

4) There is no evidence or agreement that neighbouring Local Planning Authorities can meet the shortfall. The South East Plan for Waverley of 250 target was set on the basis that development in bordering Local Planning Authorities would take place and therefore does not justify a reduction in Waverley's provision. Relying on Neighbouring Local Planning Authorities will result in increased traffic movement to access services, jobs.

5) Removal of garden land from previously developed land and windfall allowance means that there is a need for a higher housing provision.

Changes Proposed by Representation

Council Response

1) The 230 dwellings per annum in Policy CS2 is the figure that was contained in the South East Plan before it was increased by the Secretary of State on the recommendation of the Examination in Public Panel. The Council considers that the approach strikes the right balance between delivering new homes needed in the area whilst recognising the rural character of the area and the various constraints including the Green Belt, landscape designations and biodiversity designations which together with limitations on access to services and public transport, restrict the suitability of land to accommodate new homes in a sustainable way.

2) It is recognised that outside the Haslemere settlement boundary, there is very limited scope to release land that is adjacent to the settlements and not constrained by the Green Belt, AONB or AGLV. However, as there is sufficient available land adjacent to settlements outside the Green Belt, AONB or AGLV in the whole of the Borough to meet the housing requirement, there is no justification to review these designated areas of constraint. Furthermore, Haslemere is one of the four main settlements and therefore there will be opportunities for housing development within the settlement through infilling or the redevelopment of existing sites that will help meet its housing needs. Farnham is the largest settlement in Waverley and the most sustainable in terms of the range of services, employment opportunities and access to public transport. Evidence does not indicate insurmountable problems in relation to infrastructure even taking into account planned developments outside Waverley. It is acknowledged that Cranleigh is the smallest of the four main settlements in the Borough and it does not have a railway station. However, it does have access to other public transport, a wide range of services and good employment opportunities. As the countryside adjoining the edge of the village settlement is not within the Green Belt, AONB and AGLV it is considered that there is the potential for limited releases of land on the edge of Cranleigh to contribute to meeting the Borough overall target.

3) Waverley is not within any 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. It is also considered that there is a reasonable case to revert to the South East Plan Option 1 figure of 230 homes a year 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.

4) The Council's Duty to Cooperate Report sets out how the Council has liaised and worked with other Local Planning Authorities on its Core Strategy. It is not possible to quantify a specific number of homes that will be provided in neighbouring areas and that will meet some of Waverley's needs, as there is no formal agreement with adjoining authorities to this effect. However, given the overlap of housing markets, it is reasonable to identify, as a matter of fact, the major development planning close to Waverley and whether they are in excess of the South East Plan requirements.

5) Historically many of the new homes that have been built in the Borough have been on windfall sites. Paragraph 48 of the NPPF states that Councils may make an allowance for windfall sites in the five year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable

source of supply. Therefore, a windfall allowance based on past completions has been included in the Council's housing supply. The allowance however takes a precautionary approach and discounts the past completion rates by 25% in the event that the supply from this source is less than planned and to take account of the approach to garden land in paragraph 53 of the NPPF. Windfalls have not been included in the first three years of the Core Strategy (2012 to 2015) in order to avoid the risk of double counting with homes that already have planning permission. Policy CS2 also makes it clear that additional greenfield sites will be identified and held in reserve. They could then be considered for releases if evidence clearly shows that other sources of supply are not coming forward.

Implications for Core Strategy	No change
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Name/Organisation	Mr Chris Marks Sturt Farm Ltd
Representation Number	CSPS206
Paragraph/ Policy	Policy CS2
Summary of Representation	1) The Core Strategy will restrict Haslemere growth as a main centre. It only allocates around 24 dwellings per annum which is a 60% reduction from the delivery level between 2001 and 2010. It has the lowest allocation of the four main settlements. This will not meet the towns housing needs. The Strategy is based on landscape designation constraints. It is also incorrect to say that there is not available or suitable land for housing that is not covered by the constraints as demonstrated by the SHLAA done by Bakers. Including sites in Hindhead and Beacon Hill in Haslemere is not appropriate as these locations are dispersed and remote. Housing delivery in Haslemere has declined since 2006. A reliance on the development of small sites added to the under provision will increase the need for affordable homes. The Core Strategy and the Haslemere Town Design Statement seems to drive towards preventing development rather than meeting social and economical needs.
Changes Proposed by Representation	
Council Response	1) It is recognised that outside the Haslemere settlement boundary, there is very limited scope to release land that is adjacent to the settlements and not constrained by the Green Belt, AONB or AGLV. However, as there is sufficient available land adjacent to settlements outside the Green Belt, AONB or AGLV in the whole of the Borough to meet the housing requirement, there is no justification to review these designated areas of constraint. Furthermore, Haslemere is one of the four main settlements and therefore there will be opportunities for housing development within the settlement through infilling or the redevelopment of existing sites that will help meet its housing needs.
Implications for Core Strategy	No change

Name/Organisation	Monkhill Ltd
Representation Number	CSPS208
Paragraph/ Policy	Policy CS2
Summary of Representation	<p>1) The amount of housing is inadequate to meet housing needs. Waverley's target is based on capacity rather than meeting housing need. The decline in housing construction means that the delivery of housing to meet needs is low</p> <p>2) The proposed location is flawed and unbalanced and allows for incremental and opportunistic growth only. No strategic spatial framework is provided for the growth and evolution of the main settlements. Haslemere has not been adequately considered and the allocation is inadequate. The location of housing is not based on where the need is but on the opportunity for new housing based on constraints. Farnham has environmental issues whereas Cranleigh has poor transport links and poor access to services and jobs other than by car. The approach is based on constraints and relies on rural brownfield sites and sites peripheral to the main towns that may not be successfully integrated and accessed.</p> <p>3) There is no justification for 230 dwellings per annum, below the South East Plan.</p> <p>4) There is no evidence or agreement that neighbouring Local Planning Authorities can meet the shortfall. The South East Plan for Waverley of 250 target was set on the basis that development in bordering Local Planning Authorities would take place and therefore does not justify a reduction in Waverley's provision. Relying on Neighbouring Local</p>

Planning Authorities will result in increased traffic movement to access services, jobs.
5) Removal of garden land from previously developed land and windfall allowance means that there is a need for a higher housing provision.

Changes Proposed by Representation

Council Response

1) The 230 dwellings per annum in Policy CS2 is the figure that was contained in the South East Plan before it was increased by the Secretary of State on the recommendation of the Examination in Public Panel. The Council considers that the approach strikes the right balance between delivering new homes needed in the area whilst recognising the rural character of the area and the various constraints including the Green Belt, landscape designations and biodiversity designations which together with limitations on access to services and public transport, restrict the suitability of land to accommodate new homes in a sustainable way.

2) It is recognised that outside the Haslemere settlement boundary, there is very limited scope to release land that is adjacent to the settlements and not constrained by the Green Belt, AONB or AGLV. However, as there is sufficient available land adjacent to settlements outside the Green Belt, AONB or AGLV in the whole of the Borough to meet the housing requirement, there is no justification to review these designated areas of constraint. Furthermore, Haslemere is one of the four main settlements and therefore there will be opportunities for housing development within the settlement through infilling or the redevelopment of existing sites that will help meet its housing needs. Farnham is the largest settlement in Waverley and the most sustainable in terms of the range of services, employment opportunities and access to public transport. Evidence does not indicate insurmountable problems in relation to infrastructure even taking into account planned developments outside Waverley. It is acknowledged that Cranleigh is the smallest of the four main settlements in the Borough and it does not have a railway station. However, it does have access to other public transport, a wide range of services and good employment opportunities. As the countryside adjoining the edge of the village settlement is not within the Green Belt, AONB and AGLV it is considered that there is the potential for limited releases of land on the edge of Cranleigh to contribute to meeting the Borough overall target.

3) Waverley is not within any 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. It is also considered that there is a reasonable case to revert to the South East Plan Option 1 figure of 230 homes a year 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.

4) The Council's Duty to Cooperate Report sets out how the Council has liaised and worked with other Local Planning Authorities on its Core Strategy. In the absence of a formal agreement, the Council recognises that it cannot identify a specific quantum of housing being delivered elsewhere to off-set housing in Waverley. However, as a matter of fact, it is reasonable to draw attention to this, particularly where housing delivery is exceeding the South East Plan requirement.

5) Historically many of the new homes that have been built in the Borough have been on windfall sites. Paragraph 48 of the NPPF states that Councils may make an allowance for windfall sites in the five year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Therefore, a windfall allowance based on past completions has been included in the Council's housing supply. The allowance however takes a precautionary approach and discounts the past completion rates by 25% in the event that the supply from this source is less than planned and to take account of the approach to garden land in paragraph 53 of the NPPF. Windfalls have not been included in the first three years of the Core Strategy (2012 to 2015) in order to avoid the risk of double counting with homes that already have planning permission. Policy CS2 also makes it clear that additional greenfield sites will be identified and held in reserve. They could then be considered for releases if evidence clearly shows that other sources of supply are not coming forward.

Implications for Core Strategy

No change

Name/Organisation	Monkhill Ltd
Representation Number	CSPS210

Paragraph/ Policy	Policy CS2
Summary of Representation	See above representation from Chris Marks on behalf of Sturt Farm LTD (CSPS 206)
Changes Proposed by Representation	
Council Response	See Councils response above to Chris Marks on behalf of Sturt Farm LTD (CSPS 206)
Implications for Core Strategy	No change

Name/Organisation	Mr Andrew Macleod Farnham Society/Tim Cox
Representation Number	CSPS263
Paragraph/ Policy	Policy CS2
Summary of Representation	<p>1) The Core Strategy has dismissed the development of Dunsfold which could provide 2,000 - 3,000 homes in a sustainable eco - development and would have precluded the need for greenfield releases. Although the appeal for 2,601 homes at Dunsfold was dismissed in July 2009 the inspector considered that there were many benefits of the development but it would have an unacceptable impact on an inadequate local road network. Also allowing the appeal would have the effect of predetermining the outcome of the emerging Local Development Framework process. The proposal should be revisited to see if the transport issues can be resolved. The Sustainability Appraisal only considers a new settlement of only 1,000 homes which is less likely to offer the range of services.</p> <p>2) Development in Farnham would conflict with the need to protect the Thames Basin Heath Special Protection Area.</p> <p>3) What co-operation has taken place with neighbouring properties in terms of establishing the impact of proposed development in these districts on Waverley's infrastructure and in meeting housing needs. Including and phasing Greenfield releases could result in housing over provision.</p> <p>4) The development of Dunsfold was not an option to be considered in earlier consultations. Only an option for a free standing settlement was put forward which the Farnham Society dismissed on the basis of a lower overall target.</p>
Changes Proposed by Representation	<p>1) The proper consideration and inclusion of the Dunsfold site for residential and other development of a scale capable of sustaining a wide range of services similar to those envisaged in the dismissed planning appeal.</p> <p>2) The reduction of housing targets at Farnham, Cranleigh and Godalming such that there is no requirement for greenfield development within the Plan period. The deletion of any reference in the policy to the identification of 'additional greenfield sites'</p>
Council Response	<p>1) It is not considered that the planned strategy requires a new settlement of the size previously proposed at Dunsfold Park. Even a lower level of development (such as 500 or 1,000 homes) would still be likely to result in an unsustainable development. 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>2) Farnham is the largest settlement in Waverley and the most sustainable in terms of the range of services, employment opportunities and access to public transport. Evidence does not indicate insurmountable problems in relation to infrastructure even taking 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 the housing needs arising in the largest settlement. Agreed measures are in place to provide avoidance/mitigation measures, such that housing in Farnham would not have an adverse impact on the SPA.</p> <p>3) The Council's Duty to Cooperate Report sets out how the Council has liaised and worked with other Local Planning Authorities on its Core Strategy.</p> <p>4) It is considered that the option of a new settlement as proposed at Dunsfold Park has been addressed.</p>
Implications for Core Strategy	No change

Name/Organisation	Central Land Holdings Ltd
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Representation Number	CSPS255
Paragraph/ Policy	Policy CS2
Summary of Representation	1) The Core Strategy will not deliver the required amount of housing. Object to 230 dwellings per annum as it is below the South East Plan figure of 250. The South East still remains part of the development plan. It does not significantly boost the supply of housing.
Changes Proposed by Representation	1) Amend policy CS2 to make provision for 5,500 homes between 2006 - 2028. 2) Include a statement in Policy CS2 that the built up area of Farnham includes Badshot Lea.
Council Response	1) Waverley is not within any 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. It is also considered that there is a reasonable case to revert to the South East Plan Option 1 figure of 230 homes a year 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. 2) Agree that Policy CS2 should clarify that Farnham includes Badshot Lea
Implications for Core Strategy	Amend Policy CS2 to ensure all references to Farnham includes Badshot Lea

Name/Organisation	Mr Alex Sciarretta Sentinel Housing Association
Representation Number	CSPS259
Paragraph/ Policy	Policy CS2
Summary of Representation	1) Object to the reliance on garden land for development and high windfall estimate. 2) No justification for a figure of 230 dwellings per annum below the South East Plan figure of 250 and will not meet housing needs. 3) No strategic site allocations are made. Coxbridge Farm should form a strategic allocation.
Changes Proposed by Representation	
Council Response	1) Historically many of the new homes that have been built in the Borough have been on windfall sites. Paragraph 48 of the NPPF states that Councils may make an allowance for windfall sites in the five year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Therefore, a windfall allowance based on past completions has been included in the Council's housing supply. The allowance however takes a precautionary approach and discounts the past completion rates by 25% in the event that the supply from this source is less than planned and to take account of the approach to garden land in paragraph 53 of the NPPF. Windfalls have not been included in the first three years of the Core Strategy (2012 to 2015) in order to avoid the risk of double counting with homes that already have planning permission. Policy CS2 also makes it clear that additional greenfield sites will be identified and held in reserve. They could then be considered for releases if evidence clearly shows that other sources of supply are not coming forward. 2) Waverley is not within any 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. It is also considered that there is a reasonable case to revert to the South East Plan Option 1 figure of 230 homes a year 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. 3) 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 and development allocations should be made in a subsequent DPD which will identify specific sites for housing. The Core Strategy does provide clarity about how the Council will meet its housing requirements and Policy CS2 clearly sets out the broad location for development within the Borough. However it is considered reasonable to leave the specific identification of sites to the site allocations stage. Pending this, the Council is confident that it can demonstrate that it has a five year supply of land for housing.
Implications for Core Strategy	No change

Name/Organisation	Mr Alex Sciarretta Sentinel Housing Association
Representation Number	CSPS268
Paragraph/ Policy	Policy CS2
Summary of Representation	<p>1) The Council does not justify its figure of 230 dwellings per annum, below the 250 dwellings per annum in the South East Plan.</p> <p>2)The amount of housing provided for doesn't meet housing need.</p> <p>3) No strategic sites allocations in the Core Strategy. When the City of York did their Core Strategy they were forced to withdraw it. SPD should only be used where it can speed up sustainable development.</p> <p>4) There is no indication that additional SANG can be delivered.</p> <p>5) Supports the approach to selected greenfield releases; Coxbridge Farm sites is one such site.</p> <p>6) Core strategy approach relies too heavily on windfalls.</p>
Changes Proposed by Representation	
Council Response	<p>1) Waverley is not within any 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. It is also considered that there is a reasonable case to revert to the South East Plan Option 1 figure of 230 homes a year 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> <p>2) The 230 dwellings per annum in Policy CS2 is the figure that was contained in the South East Plan before it was increased by the Secretary of State on the recommendation of the Examination in Public Panel. The Council considers that the approach strikes the right balance between delivering new homes needed in the area whilst recognising the rural character of the area and the various constraints including the Green Belt, landscape designations and biodiversity designations which together with limitations on access to services and public transport, restrict the suitability of land to accommodate new homes in a sustainable way.</p> <p>3) 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 and development allocations should be made in a subsequent DPD which will identify specific sites for housing. The Core Strategy does provide clarity about how the Council will meet its housing requirements and Policy CS2 clearly sets out the broad location for development within the Borough. However it is considered reasonable to leave the specific identification of sites to the site allocations stage. Pending this, the Council is confident that it can demonstrate that it has a five year supply of land for housing.</p> <p>4) Natural England have not raised any concerns over the adequacy of Farnham Park as a SANG. It is recognised that to deliver the planned greenfield releases around Farnham further SANG will be required. However, it is considered that over the period of the Plan and informed by the site selection process; additional SANG to serve these greenfield releases will be identified.</p> <p>5) Support noted</p> <p>6) Historically many of the new homes that have been built in the Borough have been on windfall sites. Paragraph 48 of the NPPF states that Councils may make an allowance for windfall sites in the five year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Therefore, a windfall allowance based on past completions has been included in the Council's housing supply. The allowance however takes a precautionary approach and discounts the past completion rates by 25% in the event that the supply from this source is less than planned and to take account of the approach to garden land in paragraph 53 of the NPPF. Windfalls have not been included in the first three years of the Core Strategy (2012 to 2015) in order to avoid the risk of double counting with homes that already have planning permission. Policy CS2 also makes it clear that additional greenfield sites will be identified and held in reserve. They could then be considered for releases if evidence clearly shows that other sources of supply are not coming forward.</p>
Implications for Core Strategy	No change

Name/Organisation	Dunsfold Parish Council Dunsfold Parish Council
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Representation Number	CSPS283
Paragraph/ Policy	Policy CS2
Summary of Representation	1) This Council supports the provisions in the draft concerning the location of new housing and the policy concerning Rural Exception Sites.
Changes Proposed by Representation	
Council Response	1) Support noted
Implications for Core Strategy	No change

Name/Organisation	Mrs Kathy Smyth Guildford and Waverley Friends of the Earth
Representation Number	CSPS288
Paragraph/ Policy	Policy CS2
Summary of Representation	<p>1) Waverley has relied on over provision in neighbouring Local Planning Authorities to meet Waverley's needs. However, these Boroughs have increased their provision to meet their own needs. Waverley has not complied with the duty to co-operate especially with Rushmoor and East Hants and support Rushmoor's objection.</p> <p>2) Object to the 230 dwellings per annum in the Core Strategy which is the minimum figure that Waverley thought it would get away with.</p> <p>3) Assuming a higher provision is required, the location of housing including Dunsfold needs reviewing.</p>
Changes Proposed by Representation	It isn't currently possible to suggest changes. The situation in relation to government policy on housing numbers in Core Strategies is too uncertain but there are clear signs that there is a serious move towards requiring provision in line with need and in accordance with a robust evidence base. If this is correct then this Core strategy is clearly unsound and it will either have to be suspended for further work or withdrawn.
Council Response	<p>1) The Council's Duty to Cooperate Report sets out how the Council has liaised and worked with other Local Planning Authorities on its Core Strategy.</p> <p>2) The 230 dwellings per annum in Policy CS2 is the figure that was contained in the South East Plan before it was increased by the Secretary of State on the recommendation of the Examination in Public Panel. The Council considers that the approach strikes the right balance between delivering new homes needed in the area whilst recognising the rural character of the area and the various constraints including the Green Belt, landscape designations and biodiversity designations which together with limitations on access to services and public transport, restrict the suitability of land to accommodate new homes in a sustainable way.</p> <p>3) Historically many of the new homes that have been built in the Borough have been on windfall sites. Paragraph 48 of the NPPF states that Councils may make an allowance for windfall sites in the five year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Therefore, a windfall allowance based on past completions has been included in the Council's housing supply. The allowance however takes a precautionary approach and discounts the past completion rates by 25% in the event that the supply from this source is less than planned and to take account of the approach to garden land in paragraph 53 of the NPPF. Windfalls have not been included in the first three years of the Core Strategy (2012 to 2015) in order to avoid the risk of double counting with homes that already have planning permission. Policy CS2 also makes it clear that additional greenfield sites will be identified and held in reserve. They could then be considered for releases if evidence clearly shows that other sources of supply are not coming forward.</p>
Implications for Core Strategy	No change

Name/Organisation	Mr Colin Hall CPRE SURREY
Representation Number	CSPS299
Paragraph/ Policy	Policy CS2
Summary of Representation	<p>1) Support the acknowledgement of the need to protect Waverley's predominantly rural environment.</p> <p>2) There is concern that selected greenfield land releases on the edge of built up areas will</p>

	<p>have a significantly adverse impact on the valued countryside and will be damaging to the character of Farnham and Cranleigh. Identifying or releasing sites will result in pressure from developers to develop them rather than focus developing within built up areas.</p> <p>3) There is a need to phase the release of greenfield sites because the Core Strategy demonstrates that a 5 year worth of housing against their housing requirement (+5%) can be met and therefore there is no need to identify any specific Greenfield sites nor release them.</p> <p>4) Sites within settlements , above those identified in the SHLAA will continue to come forward therefore the windfall estimates are conservative.</p> <p>5) Development in neighbouring Local Planning Authorities are proposed.</p>
Changes Proposed by Representation	<p>Housing land supply should be effectively phased so that Greenfield sites are not identified (except by broad locations in the SHLAA) or released until monitoring shows that they are needed after sites have been developed towards the end of the plan period. No reserve Greenfield sites should be identified in the DPD to avoid blighting the land and the identification of any reserve Greenfield sites should only be considered as and when there is clear evidence that they are required to meet the overall housing target.</p>
Council Response	<p>1) Support noted</p> <p>2) 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. 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. Farnham is the largest settlement in Waverley and the most sustainable in terms of the range of services, employment opportunities and access to public transport. Evidence does not indicate insurmountable problems in relation to infrastructure even taking into account planned developments outside Waverley. It is acknowledged that Cranleigh is the smallest of the four main settlements in the Borough and it does not have a railway station. However, it does have access to other public transport, a wide range of services and good employment opportunities. As the countryside adjoining the edge of the village settlement is not within the Green Belt, AONB and AGLV it is considered that there is the potential for limited releases of land on the edge of Cranleigh to contribute to meeting the Borough overall target.</p> <p>3) Current evidence on deliverable sites shows a shortfall between what is expected to be delivered on potential housing sites within settlements and on rural brownfield land, and the overall target. Therefore, there is a 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.</p> <p>4) Historically many of the new homes that have been built in the Borough have been on windfall sites. Paragraph 48 of the NPPF states that Councils may make an allowance for windfall sites in the five year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Therefore, a windfall allowance based on past completions has been included in the Council's housing supply. The allowance however takes a precautionary approach and discounts the past completion rates by 25% in the event that the supply from this source is less than planned and to take account of the approach to garden land in paragraph 53 of the NPPF. Windfalls have not been included in the first three years of the Core Strategy (2012 to 2015) in order to avoid the risk of double counting with homes that already have planning permission.</p> <p>5) It is not possible to quantify a specific number of homes that will be provided in neighbouring areas and that will meet some of Waverley's needs, as there is no formal agreement with adjoining authorities to this effect. However, given the overlap of housing markets, it is reasonable to identify, as a matter of fact, the major development planning close to Waverley and whether they are in excess of the South East Plan requirements.</p>
Implications for Core Strategy	No change

Name/Organisation	Farnham Town Council Farnham Town Council
Representation Number	CSPS303
Paragraph/ Policy	Policy CS2

Summary of Representation	<p>1) The result from the previous consultation on housing numbers is that a realistic target was 157 dwellings per annum rather than the now defunct South East Plan target of 230, in order to protect the Countryside beyond the Green Belt.</p> <p>2) Waverley is a rural Borough. Although not protected by the Green Belt, Farnham is surrounded by countryside and protected by other designations. To lose the countryside would alter Farnham's character. Farnham has little opportunity for windfall development since most opportunities have already been taken.</p> <p>3) The Core Strategy incorrectly relies on mitigating the impact of development on the SPA through SANG and ignores the Waddenzee Judgement. It is not sound to hope that SANG will come forward as sites are either unavailable or not suitable for SANG.</p> <p>4) Dunsfold Park is a site that is available which is beyond the 5km buffer of the SPA.</p>
Changes Proposed by Representation	<p>1) Farnham's infrastructure including educational facilities and transport can not cope with being able to support 35% of waverley's Housing Target. 2) The Core Strategy only sets a target for 12 dwellings for the villages which will not meet needs or viability. 3) The target does not set out how development will be managed over the time period to ensure it is controlled over the first 10 years. 4) The growth of Farnham needs to be controlled rather than decided by the market in order to preserve the settlements attractive character.</p>
Council Response	<p>1) 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. 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>2) Farnham is the largest settlement in Waverley and the most sustainable in terms of the range of services, employment opportunities and access to public transport. Evidence does not indicate insurmountable problems in relation to infrastructure even taking into account planned developments outside Waverley. One of the core planning principles under Paragraph 17 of the NPPF states that allocations of land for development should prefer land of lesser environmental value where consistent with other policies in the framework. Paragraph 83 of the NPPF states that once established, Green Belt boundaries should be altered in exceptional circumstances. Paragraph 115 says that great weight should be given to conserving landscape and scenic beauty in AONBs. Evidence shows that there is enough land outside the Green Belt, AONB and AGLV in the Borough where development is not constrained by other factors to meet the anticipated need for greenfield releases. Therefore there is no need to release land in areas constrained by these designations.</p> <p>3) Natural England have not raised any concerns over the adequacy of Farnham Park as a SANG. It is recognised that to deliver the planned greenfield releases around Farnham further SANG will be required. However, it is considered that over the period of the Plan and informed by the site selection process; additional SANG to serve these greenfield releases will be identified.</p> <p>4) It is not considered that the planned strategy requires a new settlement of the size previously proposed at Dunsfold Park. Even a lower level of development (such as 500 or 1,000 homes) would still be likely to result in an unsustainable development. 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>
Implications for Core Strategy	No change

Name/Organisation	Mr David O'Reilly Welbeck Strategic Land LLP
Representation Number	CSPS315
Paragraph/ Policy	Policy CS2
Summary of Representation	<p>1) The Core Strategy is unsound. It does not meet objectively assessed needs. Perversely, although the evidence shows an increase in need and that there are available sites, the Core Strategy continues to propose a reduction in housing numbers. There is no justification for an exception to meeting needs because although it is not a growth area, Waverley is still obliged to meet need.</p> <p>2) The target of 230 is below the South East Plan and the amount of need identified in the SHMA which has been found sound. The work in 2005 on housing potential is 7 years old and out of date.</p>

- 3) Waverley has failed to consider that demographic projections or likely need/demand in arriving at its target. Our evidence shows that Waverley is projected to have demand for between 360 - 490 units per year, more realistically to be the higher figure taking into account need.
- 4) Waverley has historically been under delivering its annual housing target. Waverley also fails to flexibly deal with the shortfall and delays dealing with delivering some of its main Brownfield sites.
- 5) Relying on development within town centres and on windfalls is unrealistic.
- 7) There is an obligation to make the most effective use of land despite density targets in PPS3 being removed. If this does result in a fall in delivery then supply should be increased.
- 8) Development in neighbouring Local Planning Authorities caters for a different market. It is inappropriate for Waverley to rely on neighbouring LPAs housing, particularly if shortfalls have been identified in their evidence base.
- 9) The Core Strategy lacks the flexibility required to meet housing needs and the risk that core Brownfield sites could be delayed, especially in the first five years of the plan. Therefore there is a need to identify enough Greenfield sites.
- 10) The Core Strategy's housing allocation for Farnham should make reference to a general direction of housing growth at Badshot Lea and set out in Policy CS2 that it is a major location for Greenfield release in the Development Management and Site Allocations DPD. The Core Strategy should either identify strategic sites or at least justify broad directions for growth.
- 11) The approach to Greenfield sites for release where the housing target can not be met or where Waverley cannot demonstrate a 5 year supply is unsound as this position has already been reached.

Changes Proposed by Representation

Council Response

- 1) The 230 dwellings per annum in Policy CS2 is the figure that was contained in the South East Plan before it was increased by the Secretary of State on the recommendation of the Examination in Public Panel. The Council considers that the approach strikes the right balance between delivering new homes needed in the area whilst recognising the rural character of the area and the various constraints including the Green Belt, landscape designations and biodiversity designations which together with limitations on access to services and public transport, restrict the suitability of land to accommodate new homes in a sustainable way.
- 2) Waverley is not within any 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. It is also considered that there is a reasonable case to revert to the South East Plan Option 1 figure of 230 homes a year 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.
- 3) Waverley is an attractive place to live which explains the strong demand for market housing. Evidence of demand is 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. Evidence indicates that historically migration trends vary widely year on year, so care is needed in seeking to project how these trends will affect local population growth over the extended period of the Plan.
- 4) The South East Plan target is 250 new homes a year from 2006. Prior to this, the 2004 Surrey Structure Plan requirement was 187 new homes a year. In 7 of the 10 years since 2002 housing supply has exceeded the housing target. Therefore, there is not a record of persistent under delivery. The number of new homes completed since 2002 are set out in the Council's Annual Monitoring Reports.
- 5) Including potential housing sites identified in the SHLAA is in accordance with Paragraph 47 of the NPPF. This states that the Council should identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing supply. The amount of housing from this source has been discounted by 10% to allow for non implementation. Historically many of the new homes that have been built in the Borough have been on windfall sites. Paragraph 48 of the NPPF states that Councils may make an allowance for windfall sites in the five year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Therefore, a windfall allowance based on past completions has been included in the Council's housing supply.

The allowance however takes a precautionary approach and discounts the past completion rates by 25% in the event that the supply from this source is less than planned and to take account of the approach to garden land in paragraph 53 of the NPPF. Windfalls have not been included in the first three years of the Core Strategy (2012 to 2015) in order to avoid the risk of double counting with homes that already have planning permission. Policy CS2 also makes it clear that additional greenfield sites will be identified and held in reserve. They could then be considered for releases if evidence clearly shows that other sources of supply are not coming forward.

Implications for Core Strategy	See amended paragraph 6.11
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Name/Organisation	Wates Developments Limited
Representation Number	CSPS316
Paragraph/ Policy	Policy CS2
Summary of Representation	<p>1) The Core Strategy proposed 230 dwellings per annum, below the South East Plan provision of 250 dwellings per annum. The explanatory text to the South East Plan casts doubt as to whether the requirement for the region was adequate.</p> <p>2) The latest population and household projections 2010 have increased since they were used for the SHMA which was published in 2009. Therefore there is a need to provide even more housing than the SMHA demonstrates.</p>
Changes Proposed by Representation	<p>1) Change Policy CS2 to reflect more up to date evidence that shows 10,000 additional households required between 2006 and 2028.</p> <p>2) Taking into account completions, this is an annual requirement of 534 dwellings per annum from 2012 - 2028. Greenfield releases would be 5,907 dwellings.</p> <p>3) Greenfield releases should be directed to Farnham which is the largest settlement.</p> <p>4) If there is a need to additional sites after developing suitable sites on the edge of Farnham and Cranleigh in accordance with proposed policy CS2 then sites on the edge of the four main settlements should be released by reviewing the Greenbelt, AONB and AGLV and this should be set out as criterion 3 of Policy CS2.</p> <p>5) The increased household requirement of 10,000 means that the anticipated delivery of housing in the AMR between 2011 to 2021 equate to only 3.42 years, therefore there is a need to identify and develop some Greenfield sites within the first five years.</p> <p>6) Because of the time it will take to prepare the proposed Development and Site Allocations DPD or neighbourhood plans and the long lead in time to build it is unlikely that sties can be delivered in the first 5 years. The Core Strategy should identify the broad location of strategic scale development (normally 500+ dwellings) and small to medium scale Greenfield sites.</p>
Council Response	<p>1) Waverley is not within any 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. It is also considered that there is a reasonable case to revert to the South East Plan Option 1 figure of 230 homes a year 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> <p>2) The 230 dwellings per annum in Policy CS2 is the figure that was contained in the South East Plan before it was increased by the Secretary of State on the recommendation of the Examination in Public Panel. The Council considers that the approach strikes the right balance between delivering new homes needed in the area whilst recognising the rural character of the area and the various constraints including the Green Belt, landscape designations and biodiversity designations which together with limitations on access to services and public transport, restrict the suitability of land to accommodate new homes in a sustainable way.</p> <p>3) Waverley is an attractive place to live which explains the strong demand for market housing. Evidence of demand is 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. Evidence indicates that historically migration trends vary widely year on year, so care is needed in seeking to project how these trends will affect local population growth over the extended period of the Plan.</p>
Implications for Core Strategy	See updated paragraph 6.11

Name/Organisation	Mr Henry Birch Notcutts Ltd
Representation Number	CSPS320
Paragraph/ Policy	Policy CS2
Summary of Representation	<p>1) The South East Plan is used as evidence for the Core Strategy housing figure but this was based on 2004 projections and the South East Plan itself recognised that higher housing numbers could be tested. The Secretary of State considered 250 dwellings per annum as the minimum figure and therefore Waverley should increase the total figure by 440. The provision of Cranleigh should be increased from 836 to 938 homes if additional homes from the 230 is distributed on a pro-rata basis.</p> <p>2) Windfalls account for 24% of the total residential housing requirement. This is unrealistic as sites will have already been identified through the SHLAA, they can not be assessed as available, suitable or achievable especially in Farnham where there is a need to provide SANG.</p> <p>3) The NPPF allows for a review of the Green Belt if it constrains increased levels of development and should look at a limited review where the Green Belt adjoins the major settlement such as Cranleigh. If not then in order to meet objectively assessed needs, the re-use of sites such as brownfield sites should be carried out.</p>
Changes Proposed by Representation	<p>1) The Council should provide 250 dwellings per annum(5,500 homes 2006-2028). The delivery should accord with Policy CS1 and therefore policy CS2 should be clarified to allow for development for using rural previously developed land.</p> <p>2) Amend 4 to say " The use of suitable rural brownfield land, including the surplus land at Upper Tuesley (the former Milford Hospital sites), which may be located both within and beyond the Greenbelt in accordance with policy CS1".</p>
Council Response	<p>1) The 230 dwellings per annum in Policy CS2 is the figure that was contained in the South East Plan before it was increased by the Secretary of State on the recommendation of the Examination in Public Panel. The Council considers that the approach strikes the right balance between delivering new homes needed in the area whilst recognising the rural character of the area and the various constraints including the Green Belt, landscape designations and biodiversity designations which together with limitations on access to services and public transport, restrict the suitability of land to accommodate new homes in a sustainable way.</p> <p>2) Historically many of the new homes that have been built in the Borough have been on windfall sites. Paragraph 48 of the NPPF states that Councils may make an allowance for windfall sites in the five year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Therefore, a windfall allowance based on past completions has been included in the Council's housing supply. The allowance however takes a precautionary approach and discounts the past completion rates by 25% in the event that the supply from this source is less than planned and to take account of the approach to garden land in paragraph 53 of the NPPF. Windfalls have not been included in the first three years of the Core Strategy (2012 to 2015) in order to avoid the risk of double counting with homes that already have planning permission. Policy CS2 also makes it clear that additional greenfield sites will be identified and held in reserve. They could then be considered for releases if evidence clearly shows that other sources of supply are not coming forward.</p> <p>3) One of the core planning principles under Paragraph 17 of the NPPF states that allocations of land for development should prefer land of lesser environmental value where consistent with other policies in the framework. Paragraph 83 of the NPPF states that once established, Green Belt boundaries should be altered in exceptional circumstances. Paragraph 115 says that great weight should be given to conserving landscape and scenic beauty in AONBs. Evidence shows that there is enough land outside the Green Belt, AONB and AGLV in the Borough where development is not constrained by other factors to meet the anticipated need for greenfield releases. Therefore there is no need to release land that does not meet the criteria for greenfield releases in Policy CS2.</p>
Implications for Core Strategy	No change

Name/Organisation	Mr Cain The Homes & Communities Agency
Representation Number	CSPS321

Paragraph/ Policy	
Summary of Representation	"Reference to the Upper Tuesley site (formerly known as part of the Milford Hospital) which has the potential to deliver at least 120 residential units. Considered that as the site is of strategic importance to the emerging Core Strategy. In order for the Council's approach to housing delivery being effective and consistent with national policy, it is considered that direct reference should be to the Upper Tuesley site in Policy CS1.
Changes Proposed by Representation	Following on from the proposed inclusion of Upper Tuesley as a location for development in Policy CS1, we propose the inclusion within the text of Policy CS2 (p60) as bullet point 4, " Upper Tuesley Major Development site for approximately 120 homes"
Council Response	Do not agree that there is a need to specify the amount of dwellings for Upper Tuesley in the Policy. This approach is consistent with the approach to Furze Lane that does not have a number of specified.
Implications for Core Strategy	No change

Name/Organisation	Mr Cain The Homes & Communities Agency
Representation Number	CSPS327
Paragraph/ Policy	Policy CS2
Summary of Representation	1) Change all references to Milford Hospital to "Upper Tuesley (land adjacent to Milford Hospital)" to be consistent and provide clarity. 2) There is no need to refer to the need for Upper Tuesley to be reviewed in the Development Management and Site Allocations DPD as a development brief being prepared as a SPD could be construed as prejudicial to a planning applications coming forward.
Changes Proposed by Representation	We propose rewording of paragraph 5.29 as follows "In the Waverley Borough Local Plan there are two sites identified as Major Developed Sites in the Greenbelt. One has since been redeveloped; the other is Milford Hospital (Now referred to as Upper Tuesley (Land Adjacent to Milford Hospital)). That designation for Upper Tuesley remains and is carried forward in the Core Strategy and in the key diagram. Upper Tuesley is the subject of a development brief in the form of an emerging supplementary planning document for the site. There have already been some representations proposing the designation of additional Major Developed Sites in the Green Belt. The detailed assessment and potential allocations of such proposed sites will be undertaken as part of the Development Management and Site Allocations DPD, in accordance with relevant national policy."
Council Response	1) Agree that a change to the site's description should be made for consistency throughout the document and clarity. 2) Paragraph 6.19 refers to the progress that the Council has made with regard to the a SPD for the site. The reference to the work on a Development Management and Sites Allocations DPD is generic to those specific sites where planning documents that have not progressed. However it does state "where appropriate".
Implications for Core Strategy	1) Change Criterion 4 of Policy CS2 to state "The use of suitable rural brownfield land, including the surplus land at Upper Tuesley (adjacent to the Milford Hospital) ".

Name/Organisation	Mr Stewart Edge
Representation Number	CSPS330
Paragraph/ Policy	Policy CS2
Summary of Representation	1) The policy fails to put in any mechanism for encouraging the use of brownfield sites in accordance with Paragraph 111 of the NPPF which would stop greenfield sites which are expensive to deliver being developed first in preference to brownfield sites.
Changes Proposed by Representation	1) In the penultimate paragraph of policy CS2 states that Greenfield sites will not be released until at least 2018. Add a target for homes on Brownfield sites to encourage their development.
Council Response	1) Current evidence on deliverable sites shows a shortfall between what is expected to be delivered on potential housing sites within settlements and on rural brownfield land, and

the overall target. Therefore, there is a 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.

Implications for Core Strategy	No change
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Name/Organisation	Mr David Beaman
Representation Number	CSPS333
Paragraph/ Policy	Policy CS2
Summary of Representation	<p>1) The Council's consultation has not made the effort to engage the involvement of the general public and therefore may not reflect the true views of Waverley's residents, i.e. The documentation is very long and should have been summarised, road shows and exhibitions should have been held.</p> <p>2) Policy CS2 does not take into account the impact of development in neighbouring authorities added to the 1,326 homes have been constructed between 2006 and 2011 which is a higher rate than 230 a year and 1,352 homes proposed for Farnham. If the targets for trip containment and car modal splits are not met by Whitehill Bordon then there will be significant implications such as 13% increase in vehicles using Wrecclesham Hill.</p>
Changes Proposed by Representation	1) No further or very limited housing should be allowed to take place until further evidence that the impact from housing development in neighbouring properties added to the proposed new development is not detrimental.
Council Response	<p>1) The Council has undertaken a robust consultation on the Core Strategy , (see separate consultation statement).</p> <p>2) It is not possible to quantify a specific number of homes that will be provided in neighbouring areas and that will meet some of Waverley's needs, as there is no formal agreement with adjoining authorities to this effect. However, given the overlap of housing markets, it is reasonable to identify, as a matter of fact, the major development planning close to Waverley and whether they are in excess of the South East Plan requirements.</p>
Implications for Core Strategy	No change

Name/Organisation	Mrs Pamela Pownall
Representation Number	CSPS334
Paragraph/ Policy	Policy CS2
Summary of Representation	<p>1) The approach is unjustified in that it is not the most appropriate strategy considered against alternative options.</p> <p>2) Most of Farnham is covered by the SPA and there is little SANG left and none planned within Waverley's or neighbouring Local Planning Authorities into the future to meet the additional housing proposed. As such additional homes will harm the SPA and under the habitats regulation alternatives should be a priority. SPAs are the highest order of protected areas and have priority over design actions such as the AONB and AGLV which should be considered as an alternative.</p> <p>3) Dunsfold should also be considered as a location for housing as it is a brownfield site and according to the NPPF, high on the list of development.</p>
Changes Proposed by Representation	
Council Response	1) It is considered that the SA itself, together with the various version of the Core Strategy, has demonstrated how the Council has considered reasonable alternatives. The 230 dwellings per annum in Policy CS2 is the figure that was contained in the South East Plan before it was increased by the Secretary of State on the recommendation of the Examination in Public Panel. The Council considers that the approach strikes the right balance between delivering new homes needed in the area whilst recognising the rural character of the area and the various constraints including the Green Belt, landscape

designations and biodiversity designations which together with limitations on access to services and public transport, restrict the suitability of land to accommodate new homes in a sustainable way.

2) 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 the housing needs arising in the largest settlement. Agreed measures are in place to provide avoidance/mitigation measures, such that housing in Farnham would not have an adverse impact on the SPA. Natural England have not raised any concerns over the adequacy of Farnham Park as a SANG. It is recognised that to deliver the planned greenfield releases around Farnham further SANG will be required. However, it is considered that over the period of the Plan and informed by the site selection process; additional SANG to serve these greenfield releases will be identified.

3) It is not considered that the planned strategy requires a new settlement of the size previously proposed at Dunsfold Park. Even a lower level of development (such as 500 or 1,000 homes) would still be likely to result in an unsustainable development. 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.

Implications for Core Strategy	No change
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Name/Organisation	West Cranleigh Nurseries / Knowle Park
Representation Number	CSPS369
Paragraph/ Policy	Policy CS2
Summary of Representation	<p>1) The housing figure in the Core Strategy should be increased to at least 6,380 dwellings for 2006-2028 (290 dwellings per annum). The level of 230 dwellings per annum is below the South East Plan. The provision for the four main settlements is too low.</p> <p>2) Housing supply relies too heavily on windfalls.</p> <p>3) Precise figures are too prescriptive and inflexible.</p>
Changes Proposed by Representation	
Council Response	<p>1) The 230 dwellings per annum in Policy CS2 is the figure that was contained in the South East Plan before it was increased by the Secretary of State on the recommendation of the Examination in Public Panel. The Council considers that the approach strikes the right balance between delivering new homes needed in the area whilst recognising the rural character of the area and the various constraints including the Green Belt, landscape designations and biodiversity designations which together with limitations on access to services and public transport, restrict the suitability of land to accommodate new homes in a sustainable way. Waverley is not within any 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. It is also considered that there is a reasonable case to revert to the South East Plan Option 1 figure of 230 homes a year 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> <p>2) Historically many of the new homes that have been built in the Borough have been on windfall sites. Paragraph 48 of the NPPF states that Councils may make an allowance for windfall sites in the five year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Therefore, a windfall allowance based on past completions has been included in the Council's housing supply. The allowance however takes a precautionary approach and discounts the past completion rates by 25% in the event that the supply from this source is less than planned and to take account of the approach to garden land in paragraph 53 of the NPPF. Windfalls have not been included in the first three years of the Core Strategy (2012 to 2015) in order to avoid the risk of double counting with homes that already have planning permission.</p> <p>3) Based on historic rates of housing delivery and current evidence of deliverable housing sites, including windfall sites, it is considered more than likely that housing delivery over the whole Plan period will exceed the target set out in the Core Strategy. The housing trajectory also demonstrates 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 additional</p>

greenfield sites will be identified but held in reserve to be brought forward in accordance with Policy CS2.

Implications for Core Strategy	No change
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Name/Organisation	Mr Andrew Triggs South Downs National Park Authority
Representation Number	CSPS381
Paragraph/ Policy	Policy CS2
Summary of Representation	<p>1) Concerned that the housing target of 230 dwellings per annum is lower than the South East Plan, which, given the high level of housing need, Waverley should be seeking a higher target despite changes to government policy on density and the definition of previously developed land.</p> <p>2) There are opportunities to release land, either in town centres or surplus employment land and therefore setting a target below the South East Plan before assessing the suitability of these sites is premature. A lower provision of housing will lead to pressure too meet the shortfall else where</p>
Changes Proposed by Representation	<p>1) Clarify how much surplus employment and Town Centre land may be able to contribute to housing supply.</p> <p>2) This may include redundant land at Dunsfold which has some limited potential.</p>
Council Response	<p>1) Waverley is not within any 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. It is also considered that there is a reasonable case to revert to the South East Plan Option 1 figure of 230 homes a year 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. The 230 dwellings per annum in Policy CS2 is the figure that was contained in the South East Plan before it was increased by the Secretary of State on the recommendation of the Examination in Public Panel. The Council considers that the approach strikes the right balance between delivering new homes needed in the area whilst recognising the rural character of the area and the various constraints including the Green Belt, landscape designations and biodiversity designations which together with limitations on access to services and public transport, restrict the suitability of land to accommodate new homes in a sustainable way.</p> <p>2) The Council's SHLAA identifies a supply of specific deliverable sites that have potential for housing. This has included assessing the potential of available sites both in the town centres and employment land that can deliver new homes in the Borough.</p>
Implications for Core Strategy	No change

Name/Organisation	Mr Andrew Triggs South Downs National Park Authority
Representation Number	CSPS385
Paragraph/ Policy	Policy CS2
Summary of Representation	1) The key diagram should show the South Downs National Park. It should show the broad locations for selected Greenfield releases
Changes Proposed by Representation	<p>1)The role of the National Parks' setting needs to be acknowledged through its inclusion on the Key Diagram.</p> <p>2) As selected greenfield releases form part of the Boroughs housing supply, the Key Diagram should display the related areas of search.</p>
Council Response	<p>1) It is considered appropriate that the key diagram does not show the setting of designations and developments that are outside the Borough.</p> <p>2) 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 and development allocations should be made in a subsequent DPD which will identify specific sites for housing. The Core Strategy does provide clarity about how the Council will meet its housing requirements and Policy CS2 clearly sets out the broad location for development within the Borough. However, it is considered that identifying these broad locations in the Key Diagram in advance of the detailed assessment of suitable sites in the Development Management Site Allocations DPD would be premature.</p>

Implications for Core Strategy	No change
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Name/Organisation	Mr Andrew Morris Bewley Homes Plc
Representation Number	CSPS394
Paragraph/ Policy	Policy CS2
Summary of Representation	<p>1) Concerned with the Council's rationale for determining its housing target. Government overarching objective is to ensure that delivery of housing which is an important part of stimulating the national economy. This includes a buffer of 5% over the housing supply in the first 5 years. There is a demand and high need for both market and affordable homes.</p> <p>2) Although Bewley accepts that needs do not have to be met in their entirety, there is no justification for proposing a figure below the South East Plan. The Council's SHLAA shows that there is adequate land to meet the South East Plan. 250 dwellings per annum would be more responsive and flexible and provide greater certainty. The South East Plan figure has also been tested and is supported by robust evidence.</p> <p>3) Bewley supports the approach of greenfield releases on the edge of Farnham, Godalming and Cranleigh.</p>
Changes Proposed by Representation	<p>1) Revisit the overall housing target in the light of the evidence that supports the South East Plan target of 250 dwellings per annum. This will provide greater flexibility, deliver more affordable homes and will not necessitate a full review of the Core Strategy in the future.</p> <p>2) Revise the distribution of housing as follows; total requirement: 5,500 dwellings (2006-2028) (250 dpa). Total completions : 1,446 dwellings (2006 - 2012) (241 pda) Residential requirement; 4,054 dwellings (2012 - 2028) (254 dpa) Proportion split; Farnham 1460 dwellings (36%) Godalming; 730 (18%) Haslemere; 405 dwellings (10%) Cranleigh; 892 dwellings (22%) Villages 527 dwellings (13%).</p>
Council Response	<p>1) The 230 dwellings per annum in Policy CS2 is the figure that was contained in the South East Plan before it was increased by the Secretary of State on the recommendation of the Examination in Public Panel. The Council considers that the approach strikes the right balance between delivering new homes needed in the area whilst recognising the rural character of the area and the various constraints including the Green Belt, landscape designations and biodiversity designations which together with limitations on access to services and public transport, restrict the suitability of land to accommodate new homes in a sustainable way.</p> <p>2) Waverley is an attractive place to live which explains the strong demand for market housing. Evidence of demand is 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. Evidence indicates that historically migration trends vary widely year on year, so care is needed in seeking to project how these trends will affect local population growth over the extended period of the Plan. The update to the Employment Land Review 2011 examined three different scenarios of employment demand growth over the period 2010 to 2027 to establish the amount of employment land to plan for: high growth, base demand and low growth. It then considered the housing implications of each scenario. Under the high growth scenario, Waverley would require 249 dwellings per year to accommodate the increase in the Borough's B use class employment over the period 2010 to 2027. Under the base scenario it would require 190 new homes a year and under the low growth scenario it would require 133 new homes a year. This analysis is based on a series of assumptions regarding levels of commuting, economic activity, unemployment rates and household size. The Employment Land Review recommends that the base scenario is the most appropriate scenario for Core Strategy policies to be based on. As indicated elsewhere, in setting the local housing target, a balance needs to be struck between the social, economic and environmental considerations.</p> <p>3) Waverley is not within any 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. It is also considered that there is a reasonable case to revert to the South East Plan Option 1 figure of 230 homes a year 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>

	4) Support noted
Implications for Core Strategy	No change

Name/Organisation	Dockenfield Parish Clerk Jackie Hutton dockenfield parish council Dockenfield Parish Council
Representation Number	CSPS400
Paragraph/ Policy	Policy CS2
Summary of Representation	<p>1) Housing figures in table 6.1 do not take into account development in neighbouring Local Planning Authorities and estimates should be included.</p> <p>2)The Core Strategy should be clear about the need and the desire for homes particularly in rural villages and therefore new affordable homes. The allocation for villages is acceptable but should the amount of housing should be proportionate to the settlements position in the settlement hierarchy and set out accordingly.</p> <p>3) Need to consider Dunsfold for housing allocation as it is the largest employment.</p>
Changes Proposed by Representation	<p>1) Include potential estimates for cross border housing.</p> <p>2) Include positive policy direction whereby the less serviced rural hamlets should receive a reduced allocation and pressure for new builds. An "enough is enough for the moment" policy should be adopted as a material consideration.</p> <p>3) New builds and redevelopment in rural areas should be encouraged only when include very high 5 of affordable homes (and include business premises).</p> <p>4) Include an appropriate Dunsfold allocation.</p>
Council Response	<p>1) It is not possible to quantify a specific number of homes that will be provided in neighbouring areas and that will meet some of Waverley's needs, as there is no formal agreement with adjoining authorities to this effect. However, given the overlap of housing markets, it is reasonable to identify, as a matter of fact, the major development planning close to Waverley and whether they are in excess of the South East Plan requirements.</p> <p>2) The Core Strategy directs development to within and on the edge of the built up areas of the Borough's main settlements because these are the most sustainable locations. However, policies also permit small scale development within the rural villages that have an existing defined settlement boundary to meet local needs and to maintain the vitality of the village. The figure of 12 new homes a year is not a specific figure for the village to plan for but an estimate of what may come forward from this source. The estimate is based on past trends of housing completions from the rural settlements from 2001 to 2012 following a discount of 25%. Furthermore where a local need has been identified, affordable housing schemes on the edge of villages may be permitted under Policy CS6. An amount has therefore also been estimated for rural exception sites in addition to the 12 homes a year within the settlements.</p> <p>3) It is not considered that the planned strategy requires a new settlement of the size previously proposed at Dunsfold Park. Even a lower level of development (such as 500 or 1,000 homes) would still be likely to result in an unsustainable development. 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>
Implications for Core Strategy	No change

Name/Organisation	Taylor Wimpey Strategic Land Taylor Wimpey Strategic Land
Representation Number	CSPS407
Paragraph/ Policy	Policy CS2
Summary of Representation	<p>1) The Council needs to meet the needs of local people as evidence shows that Waverley has one of the worst housing crises in the country with regard to affordability and provision. 230 dwellings per annum will not meet needs, its should be over 300 dwellings per annum because:</p> <p>a)The allocation at Whitehill Bordon is separate in the South East Plan,</p> <p>b) The overall need for housing in Waverley is 706 homes per annum of which 515 should be affordable, Other evidence of needs supports this and affordable housing provision has been poor,</p> <p>c) There is a need for family homes.</p>

There is a need to develop larger, edge of settlement sites. The overall provision should be increased and Farnham, which is the largest settlements increased by 50% and the Greenfield element of Farnham doubled. This would increase the delivery of affordable homes as Greenfield sites are more viable and can supply a higher percentage of 40% than small sites.

2) The figure of 230 below the South East Plan is also not justified

3) Windfalls should not be included, if they are then the 25% discount is inadequate, particularly as windfalls do not include garden land, which has been the main source of windfalls. There is too much reliance on land within urban areas.

4) The employment land review 2009 proposed planning for some 4,400 jobs (2,300 likely to be B use) which the proposed housing requirement is not compatible with and will result in an increase in commuting just to sustain the economy. This will result in a failure to achieve sustainable transport, suitable services, vibrant town centres and recreation choice.

5) Greenfield sites will come forward in a sustainable fashion. The Core Strategy should be at least identifying the direction of growth for its most sustainable towns rather than just mapping the existing situation. Strategic sites should be identified. Land at Crondall Lane (ID 573 in 2012 SHLAA) should be allocated for housing. The site is suitably located and can deliver a range of market and affordable homes as well as to meet the need for the UCA student accommodation.

6) Supports the approach to avoid the Green belt, AONB and AGLV and that Farnham should provide housing despite being within 5km of the SPA provided that SANG is provided.

7) The amount of homes on greenfield sites for each settlement should be within the policy rather in the explanatory text.

Changes Proposed by Representation

Council Response

1) The 230 dwellings per annum in Policy CS2 is the figure that was contained in the South East Plan before it was increased by the Secretary of State on the recommendation of the Examination in Public Panel. The Council considers that the approach strikes the right balance between delivering new homes needed in the area whilst recognising the rural character of the area and the various constraints including the Green Belt, landscape designations and biodiversity designations which together with limitations on access to services and public transport, restrict the suitability of land to accommodate new homes in a sustainable way.

2) Waverley is not within any 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. It is also considered that there is a reasonable case to revert to the South East Plan Option 1 figure of 230 homes a year 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.

3) Historically many of the new homes that have been built in the Borough have been on windfall sites. Paragraph 48 of the NPPF states that Councils may make an allowance for windfall sites in the five year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Therefore, a windfall allowance based on past completions has been included in the Council's housing supply. The allowance however takes a precautionary approach and discounts the past completion rates by 25% in the event that the supply from this source is less than planned and to take account of the approach to garden land in paragraph 53 of the NPPF. Windfalls have not been included in the first three years of the Core Strategy (2012 to 2015) in order to avoid the risk of double counting with homes that already have planning permission. Policy CS2 also makes it clear that additional greenfield sites will be identified and held in reserve. They could then be considered for releases if evidence clearly shows that other sources of supply are not coming forward.

4) The update to the Employment Land Review 2011 examined three different scenarios of employment demand growth over the period 2010 to 2027 to establish the amount of employment land to plan for: high growth, base demand and low growth. It then considered the housing implications of each scenario. Under the high growth scenario, Waverley would require 249 dwellings per year to accommodate the increase in the Borough's B use class employment over the period 2010 to 2027. Under the base scenario it would require 190 new homes a year and under the low growth scenario it would require 133 new homes a year. This analysis is based on a series of assumptions regarding levels of commuting, economic activity, unemployment rates and household

size. The Employment Land Review recommends that the base scenario is the most appropriate scenario for Core Strategy policies to be based on. As indicated elsewhere, in setting the local housing target, a balance needs to be struck between the social, economic and environmental considerations.

5) 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 and development allocations should be made in a subsequent DPD which will identify specific sites for housing. The Core Strategy does provide clarity about how the Council will meet its housing requirements and Policy CS2 clearly sets out the broad location for development within the Borough. However it is considered reasonable to leave the specific identification of sites to the site allocations stage.

6) Support noted

7) The number of homes from greenfield releases is set out in Paragraph 6.34 of the Core Strategy. It is considered that there is no need to place this within the Policy CS2 itself.

Implications for Core Strategy	See updated paragraph 6.11
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Name/Organisation	Martin Grant Homes Ltd Martin Grant Homes Ltd
Representation Number	CSPS410
Paragraph/ Policy	Policy CS2
Summary of Representation	<p>1) The figure of 230 is below the 250 required in the South East Plan.</p> <p>2) The Council are relying on development in neighbouring Local Planning Authorities to meet its needs but these needs have not been objectively assessed collaboratively with other Local Planning Authorities or agreed that the needs will be met. Rushmoor can not meet its own needs, Therefore each authority needs to meet its own needs.</p> <p>3) In considering the amount of housing required Waverley has shifted the balance towards environmental protection for the sake of economic and social sustainability. The SHMA identified a need and demand for 706 homes per annum therefore the Core Strategy only provides for a third of the required homes.</p> <p>4) The Council considers, that a review of the Green Belt is not justified as there is enough land outside it. However this is based on a significant under supply of housing land. If the Greenbelt is reviewed then sites at Sturt Road/Hedgehog Lane could be released without harm to the landscape. This change to approach would also potentially release land around Milford and other second category settlements in the Waverley Settlement Hierarchy as well as the four main settlements. Such land would include land at lower Moushill Lane/Old Elstead Road. The Council has not investigated whether extensions to settlement into areas covered by arbitrary designations will have any adverse impacts that would out weight the benefits of increased housing supply.</p>
Changes Proposed by Representation	1) Amend policy CS2 to increase the number of dwellings to be delivered per year to a figure closer to the identified need of 706 dwellings per annum following analysis of crossboundary housing land supply and review of the Green Belt, AONB and AGLV to enable further greenfield land to be released in sustainable locations, including the specific sites at Sturt Farm, Haslemere and lower Moushill Land, Milford.
Council Response	<p>1) Waverley is not within any 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. It is also considered that there is a reasonable case to revert to the South East Plan Option 1 figure of 230 homes a year 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> <p>2) It is not possible to quantify a specific number of homes that will be provided in neighbouring areas and that will meet some of Waverley's needs, as there is no formal agreement with adjoining authorities to this effect. However, given the overlap of housing markets, it is reasonable to identify, as a matter of fact, the major development planning close to Waverley and whether they are in excess of the South East Plan requirements.</p> <p>3) The 230 dwellings per annum in Policy CS2 is the figure that was contained in the South East Plan before it was increased by the Secretary of State on the recommendation of the Examination in Public Panel. The Council considers that the approach strikes the right balance between delivering new homes needed in the area whilst recognising the rural character of the area and the various constraints including the Green Belt, landscape designations and biodiversity designations which together with limitations on access to</p>

services and public transport, restrict the suitability of land to accommodate new homes in a sustainable way.

4) One of the core planning principles under Paragraph 17 of the NPPF states that allocations of land for development should prefer land of lesser environmental value where consistent with other policies in the framework. Paragraph 83 of the NPPF states that once established, Green Belt boundaries should be altered in exceptional circumstances. Paragraph 115 says that great weight should be given to conserving landscape and scenic beauty in AONBs. Evidence shows that there is enough land outside the Green Belt, AONB and AGLV in the Borough where development is not constrained by other factors to meet the anticipated need for greenfield releases. Therefore there is no need to release land that does not meet the criteria for greenfield releases in Policy CS2.

Implications for Core Strategy	No change
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Name/Organisation	Bloor Homes Bloor Homes
Representation Number	CSPS413
Paragraph/ Policy	Policy CS2
Summary of Representation	<p>1) Bloor Homes supports policy CS2 with modifications. Supports the delivery of housing on suitable rural brownfield land.</p> <p>2) However, the policy should make specific reference to Major Developed Sites in the Green Belt reflecting the SHLAA. This included Weyburn Works, Elstead.</p> <p>3) Policy CS2 is based on the South East Plan Option 1 figure. However, the South East Plan predicts lower household growth than the CLG 2008 projections and therefore the figure should be increased. A higher target exacerbates the need to identify Major Developed Sites.</p>
Changes Proposed by Representation	<p>1) Policy CS2 should direct some housing to Major Developed Sites in the Green Belt, in order to meet housing needs.</p> <p>2) Policy CS2 should be revised to account for an increased housing requirement, based on more recent demographic data.</p>
Council Response	<p>1) Support noted</p> <p>2) 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 and development allocations should be made in a subsequent DPD which will identify specific sites for housing. The Core Strategy does provide clarity about how the Council will meet its housing requirements and Criterion 4 of Policy CS2 states that the additional homes required in the policy will be delivered by the use of suitable rural brownfield land. However it is considered reasonable to leave the specific identification of sites to the site allocations stage.</p> <p>3) The 230 dwellings per annum in Policy CS2 is the figure that was contained in the South East Plan before it was increased by the Secretary of State on the recommendation of the Examination in Public Panel. The Council considers that the approach strikes the right balance between delivering new homes needed in the area whilst recognising the rural character of the area and the various constraints including the Green Belt, landscape designations and biodiversity designations which together with limitations on access to services and public transport, restrict the suitability of land to accommodate new homes in a sustainable way.</p>
Implications for Core Strategy	No change

Name/Organisation	First Wessex First Wessex
Representation Number	CSPS418
Paragraph/ Policy	Policy CS2
Summary of Representation	<p>1) The approach to the amount of housing required is based on where housing is considered appropriate to go rather than on a balanced assessment of need and then using the low target to justify only the releases of SHLAA sites and a windfall allowance. 515 affordable homes are needed per year as demonstrated in the SHMA which will not be met if all the SHLAA sites are delivered.</p> <p>2) Windfall allowance is based on past trends which are unreliable given the current economic climate and the burden of financial contributions.</p>

	<p>3) The use of urban based SHLAA land only will increase house price and community levels.</p> <p>4) It is unlikely that development of meaningful significance will come forward unless urban extensions, Green Belt release or redeveloping existing employment sites are considered. The previous consultations undertaken by the Council indicate that the public understands the need to consider the development of greenfield sites, including a new settlement, regardless of either meeting the South East Plan target or following the capacity based approach.</p>
Changes Proposed by Representation	1) Increase the housing target to a minim of 5000 net dwellings for the period 2012 - 2027
Council Response	<p>1) The 230 dwellings per annum in Policy CS2 is the figure that was contained in the South East Plan before it was increased by the Secretary of State on the recommendation of the Examination in Public Panel. The Council considers that the approach strikes the right balance between delivering new homes needed in the area whilst recognising the rural character of the area and the various constraints including the Green Belt, landscape designations and biodiversity designations which together with limitations on access to services and public transport, restrict the suitability of land to accommodate new homes in a sustainable way.</p> <p>2) Historically many of the new homes that have been built in the Borough have been on windfall sites. Paragraph 48 of the NPPF states that Councils may make an allowance for windfall sites in the five year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Therefore, a windfall allowance based on past completions has been included in the Council's housing supply. The allowance however takes a precautionary approach and discounts the past completion rates by 25% in the event that the supply from this source is less than planned and to take account of the approach to garden land in paragraph 53 of the NPPF. Windfalls have not been included in the first three years of the Core Strategy (2012 to 2015) in order to avoid the risk of double counting with homes that already have planning permission. Policy CS2 also makes it clear that additional greenfield sites will be identified and held in reserve. They could then be considered for releases if evidence clearly shows that other sources of supply are not coming forward.</p> <p>3) Current evidence on deliverable sites shows a shortfall between what is expected to be delivered on potential housing sites within settlements and on rural brownfield land, and the overall target. Therefore, there is a need for greenfield releases.</p> <p>4) The Council's SHLAA identifies a supply of specific deliverable sites that have potential for housing. This has included assessing the potential of available sites both in the town centres and employment land that can deliver new homes in the Borough. One of the core planning principles under Paragraph 17 of the NPPF states that allocations of land for development should prefer land of lesser environmental value where consistent with other policies in the framework. Paragraph 83 of the NPPF states that once established, Green Belt boundaries should be altered in exceptional circumstances. Paragraph 115 says that great weight should be given to conserving landscape and scenic beauty in AONBs. Evidence shows that there is enough land outside the Green Belt, AONB and AGLV in the Borough where development is not constrained by other factors to meet the anticipated need for greenfield releases.</p>
Implications for Core Strategy	No change

Name/Organisation	Mr Norman Gillan Mono Consultants Ltd
Representation Number	CSPS422
Paragraph/ Policy	Policy CS2
Summary of Representation	<p>1) The Council has not demonstrated why 250 in the South East Plan has not been met.</p> <p>2) The amount proposed will not meet affordable housing needs. 300 dwellings per annum would meet housing need as the 2011 census data shows that Waverley's population is higher than the estimates.</p> <p>3) Compared to Farnham, Cranleigh has no rail station, poor road connections and is smaller in size so that development will have a greater impact on it. Although there are issues with SANG, Farnham is a sustainable location.</p> <p>4) There is no reasoned justification for the allocation of housing to each settlement. It would be more realistic to allocate proportionately to each settlement and therefore the split between them should be Farnham 60%, Cranleigh 30%, and Godalming 10%.</p>

Changes Proposed by Representation	
Council Response	<p>1) Waverley is not within any 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. It is also considered that there is a reasonable case to revert to the South East Plan Option 1 figure of 230 homes a year 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> <p>2) The 230 dwellings per annum in Policy CS2 is the figure that was contained in the South East Plan before it was increased by the Secretary of State on the recommendation of the Examination in Public Panel. The Council considers that the approach strikes the right balance between delivering new homes needed in the area whilst recognising the rural character of the area and the various constraints including the Green Belt, landscape designations and biodiversity designations which together with limitations on access to services and public transport, restrict the suitability of land to accommodate new homes in a sustainable way.</p> <p>3) It is acknowledged that Cranleigh is the smallest of the four main settlements in the Borough and it does not have a railway station. However, it does have access to other public transport, a wide range of services and good employment opportunities. As the countryside adjoining the edge of the village settlement is not within the Green Belt, AONB and AGLV it is considered that there is the potential for limited releases of land on the edge of Cranleigh to contribute to meeting the Borough overall target.</p> <p>4) Given the size of Cranleigh and in recognition of some of the constraints around Farnham it is considered that a 50:50 split in terms of the greenfield releases is appropriate. Policy CS2 sets out the full distribution of homes for each settlement taking into account the number of dwellings already completed, those already with planning permission or those from sites identified as potentially suitable for housing.</p>
Implications for Core Strategy	No change

Name/Organisation	Mr Jerry Hyman
Representation Number	CSPS424
Paragraph/ Policy	Policy CS2
Summary of Representation	See summary of representations to Policy CS17: Biodiversity and Geological Conservation
Changes Proposed by Representation	
Council Response	See responses to Policy CS17
Implications for Core Strategy	No change

Name/Organisation	Mr John Kelly Berkeley Strategic
Representation Number	CSPS437
Paragraph/ Policy	Policy CS2
Summary of Representation	<p>1) The South East Plan remains part of the development plan therefore as a minimum, Waverley is obliged to meet the full requirement.</p> <p>2) Even if the South East Plan is revoked in accordance with the NPPF, the Council must boost significantly the supply of housing and meet the full objectively assessed housing needs. The SHMA identifies an unmet need of 515 affordable homes and overall need and demand of 706 homes a year and therefore a locally derived housing target needs to be significantly higher.</p> <p>3) The Council should be producing a single Local Plan that identified sites that are crucial to the deliver of housing. This means that presently the Core Strategy is uncertain where greenfield sites will be allocated. Identification of greenfield sites in the Core Strategy would support preparation of the Development Management and Site Allocations DPD and Neighbourhood Plans. The area south of the Downs Link, Cranleigh is the most appropriate location for Greenfield release, given,</p> <p>i) it is free from constraints and</p> <p>ii) its connections with centre of the settlement and</p> <p>iii) the opportunities it presents in terms of meeting needs and improving transport links.</p>

4) Leaving site allocations to the Development Management and Site Allocations DPD will delay the first completions on these sites until Summer 2019 which is after the time that the housing trajectory assumes. If the windfalls are discounted by the amount as suggested and taking into account the delayed delivery of Greenfield sites the Councils 5 year supply is likely to become deficient by 2014/15 and therefore it planning by appeal.

Changes Proposed by Representation

1) Increase the amount of housing to 250 dwellings per annum in line with the South East Plan.

2) Reduce windfall allowance by 55%. Identify strategic housing sites including land south of Stocklund Square, Cranleigh.

3) Amend policy CS2 as follows; Policy CS2: The Amount and Location of Housing. The Council will make provision for at least 5,500 net additional homes in the period from 2006 to 2028 (equivalent to 250 dwellings a year). 1,446 additional homes were competed between 2006 and 2012, leaving a residual target for the period 2012 to 2028 of 4,054 dwellings. These will be delivered by

1. Promoting the use of land within settlements
2. Release of greenfield land on the edge of the four main settlements of Farnham, Godalming, Haslemere and Cranleigh, on land that is not within the Green Belt, AONB or AGLV in the broad locations identified in this Plan , together with the release of the current Reserve Housing Site at Furze Lane, Godalming.
3. Small scale affordable housing schemes in accordance with Policy CS6.
4. The use of suitable rural brownfield land, including the surplus land at Upper Tuesley (the former Milford Hospital site)

It is anticipated that these dwellings will be distributed broadly as follows:-Farnham: 1,796 Godalming:581, Haslemere (including Hindhead and Beacon Hill): 329, Cranleigh: 975, Villages:

The identification of specific housing sites within settlements be carried out through the proposed Development Management and Site Allocations DPD and/or local Neighbourhood Plans, as appropriate.

. The broad directions of growth for strategic greenfield release are identified at Appendix F and will be for the delivery of 1,747 new homes distributed as follows, Farnham: 1,044, Cranleigh: 603, Godalming: 100. Additional greenfield sites will be identified, but held in reserve only to be brought forward where there is clear evidence that the overall housing target cannot be achieved as a result of other projected sources of supply not coming forward and where the Council is not able to demonstrate a five year supply of deliverable housing sites .

Council Response

1) Waverley is not within any 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. It is also considered that there is a reasonable case to revert to the South East Plan Option 1 figure of 230 homes a year 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.

2) The 230 dwellings per annum in Policy CS2 is the figure that was contained in the South East Plan before it was increased by the Secretary of State on the recommendation of the Examination in Public Panel. The Council considers that the approach strikes the right balance between delivering new homes needed in the area whilst recognising the rural character of the area and the various constraints including the Green Belt, landscape designations and biodiversity designations which together with limitations on access to services and public transport, restrict the suitability of land to accommodate new homes in a sustainable way.

3) 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 and development allocations should be made in a subsequent DPD which will identify specific sites for housing. The Core Strategy does provide clarity about how the Council will meet its housing requirements and Policy CS2 clearly sets out the broad location for development within the Borough. However it is considered reasonable to leave the specific identification of sites to the site allocations stage. Pending this, the Council is confident that it can demonstrate that it has a five year supply of land for housing.

4) The Council's five year housing supply does not rely on greenfield releases to meet its five year housing target. Notwithstanding this, the timetable for the adoption of its Development Sites and Sites Allocation DPD is July 2015. It is considered that this will be sufficient for completions on greenfield sites to start in 2017/18.

Implications for Core Strategy	No change
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Name/Organisation	Mr Matthew Pardoe Signet Planning
Representation Number	CSPS447
Paragraph/ Policy	Policy CS2
Summary of Representation	<p>1) There is no justification for reduction the amount of housing in the South East Plan which has been tested, from 250 to 230 dwellings per annum.</p> <p>2) The amount of housing on greenfield sites is too specific, does not address the likely need to use additional land and is not flexible enough to meet changing circumstances. This could lead to an increased shortfall in housing and therefore planning by appeal.</p>
Changes Proposed by Representation	<p>1) The first paragraph of policy CS2 should be amended to refer to 250 dwelling per annum and the Council making provision of at least 5,500 net additional houses during the period from 2006 to 2028.</p> <p>2) Within the penultimate paragraph, the reference to "no more than 967 new houses", and the tests following it, should be deleted.</p>
Council Response	<p>1) Waverley is not within any 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. It is also considered that there is a reasonable case to revert to the South East Plan Option 1 figure of 230 homes a year 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> <p>2) Based on historic rates of housing delivery and current evidence of deliverable housing sites, including windfall sites, it is considered more than likely that housing delivery over the whole Plan period will exceed the target set out in the Core Strategy. The housing trajectory also demonstrates 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 additional greenfield sites will be identified but held in reserve to be brought forward in accordance with Policy CS2.</p>
Implications for Core Strategy	No change

Name/Organisation	Mr Derrick Price
Representation Number	CSPS452
Paragraph/ Policy	Policy CS2
Summary of Representation	<p>1) There is no evidence of cooperation with neighbouring Local Planning Authorities and no assessment of developments within these councils.</p> <p>2) Farnham is within the 5km zone of the Thames Basin Heath SPA and therefore previously developed land should be prioritised. The release of greenfield sites should be phased so that previously developed land is prioritised.</p> <p>3) There is no justification for not developing at Dunsfold.</p> <p>4) The evidence of housing need is based on waiting lists which is unreliable as they duplicate entries. Technological changes means that an increased critical mass is need to justify local facilities and services and therefore the Core Strategy should take positive action in all the villages to achieve this.</p> <p>5) The identification of potential housing sites within Farnham is not complete,</p>
Changes Proposed by Representation	6) The Council has undertaken a SHLAA which seeks to identify potential housing sites within settlements, but only where they are suitable, available and achievable in line with the NPPF
Council Response	<p>1) The Council's Duty to Cooperate Report sets out how the Council has liaised and worked with other Local Planning Authorities on its Core Strategy. It is not possible to quantify a specific number of homes that will be provided in neighbouring areas and that will meet some of Waverley's needs, as there is no formal agreement with adjoining authorities to this effect. However, given the overlap of housing markets, it is reasonable to identify, as a matter of fact, the major development planning close to Waverley and whether they are in excess of the South East Plan requirements.</p> <p>2) Current evidence on deliverable sites shows a shortfall between what is expected to be</p>

delivered on potential housing sites within settlements and on rural brownfield land, and the overall target. Therefore, there is a 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. 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 the housing needs arising in the largest settlement. Agreed measures are in place to provide avoidance/mitigation measures, such that housing in Farnham would not have an adverse impact on the SPA.

3) It is not considered that the planned strategy requires a new settlement of the size previously proposed at Dunsfold Park. Even a lower level of development (such as 500 or 1,000 homes) would still be likely to result in an unsustainable development. 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.

4) Housing waiting lists are only one aspect of the evidence of housing need. The other aspect is the evidence in the SHMA.

5) The Council's SHLAA identifies a supply of specific deliverable sites that have potential for housing. This has included assessing the potential of available sites both in the town centre and employment land that can deliver new homes in Farnham.

Implications for Core Strategy	No change
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Name/Organisation	Dunsfold Park Ltd Dunsfold Park Ltd
Representation Number	CSPS470
Paragraph/ Policy	Policy CS2
Summary of Representation	<p>1) The Sustainability Appraisal (SA) is flawed and inadequate. The SA does not include an objective assessment. There has been no consideration of a different quantum of housing or a different form of development. Alternative scenarios, including but not limited to comprehensive development at Dunsfold Aerodrome, have not been appropriately considered. There is a reference to the 2008 new settlement appeal and the fact that one of the reasons for rejection was prematurity, indicating that Dunsfold Aerodrome should be considered alongside other alternatives. There is no comprehensive comparison against the effects of alternatives of where greenfield releases might take place.</p> <p>2) Joint working and positive preparation, in conjunction with neighbouring authorities, as required by the NPPF, has not taken place. Consideration of the evidential base should be undertaken on a regional, sub-regional and local basis through a comparison of locations for development, including an assessment of the location's ability to come forward sustainably and meeting other local authorities' need. If this exercise were done properly then Dunsfold Aerodrome would be a clear candidate for housing delivery and sustainable integration with existing employment uses. It is considered that housing at Dunsfold Aerodrome would improve overall sustainability within Waverley.</p> <p>3) There is a failure to recognise that housing and employment development can enhance the sustainability of Dunsfold Aerodrome. It would assist the enhancement of accessibility and increase sustainability, with a high quality direct frequent bus service to relevant locations, including rail services from Guildford. Consider that Dunsfold Aerodrome has significant areas of under-utilised previously developed land (PDL).) The Core Strategy runs to 2028 and it is therefore considered that in the context of investment in new housing that is high quality, enhanced linkages with Cranleigh and Guildford, achieves the lowest possible carbon footprint and gives the best possible chance of tackling climate change, it may be more appropriate to consider the Dunsfold Aerodrome eco-village across a longer time horizon.</p> <p>4) If there is a potential for greater economic, social and environmental capacity for development, including housing, that should be recognised by an increase in the number of new homes. Housing and employment levels should be considered in the light of need and demand not just within the Borough, but in the light of potential delivery or</p>

undersupply in neighbouring authorities. Overall the housing target is too low, has not been justified and would lead to an ineffective Plan. This is considered to be a flawed analysis of capacity. The Council has also failed to plan to boost significantly the supply of housing as required by the NPPF (paragraph 47). The evidence base to justify the overall housing total is lacking. The evidence base for the South East Plan is old – most background work was carried out in 2004 – 2006.

5) There does not appear to be adequate evidence for third parties to confirm that the level of housing completions is correct.

6) The Borough relies heavily on small sites for new housing. These often fall below the threshold for affordable housing.

7) Draft Policy CS2 precludes development in or at potentially more sustainable locations which are not within settlements or are on the edge, but are capable of being more sustainable or which could be more sustainable by virtue of development, including Dunsfold Aerodrome. Development at Dunsfold Aerodrome would not threaten Green Belt, AGLV, AONB or conservation areas.

8) There would also be no harm to biodiversity such as impact on the Thames Basin Heaths SPA as a result of development at Dunsfold Aerodrome. The effects on the SPA and flood risk remain unknown and un-assessed in respect of alternative sites. Locations such as Farnham which are identified for housing development could have significant and unknown impacts on the SPA.

9) Policy CS2 should also make it clear that the broad distribution and residual target are minimum figures.

Changes Proposed by Representation

It would be necessary to go back a stage and undertake a full and robust SA of genuine alternatives. This needs to be based on effective joint working with neighbouring local authorities. Policies CS1 and CS2 need to be re-written once the SA has been done fully and comprehensively. Overall the housing target is too low, has not been justified and would lead to an ineffective Plan. Evidence such as the Housing Needs and Market Assessment is either dated or cannot be considered a product of collaboration and joint working. Housing and employment levels should be considered in the light of need and demand not just with the Borough, but in the light of potential delivery or undersupply in neighbouring authorities. Dunsfold Aerodrome and other alternatives have not been fully and properly considered as part of the SA. In addition, without prejudice to the overall concerns about the strategy, the policy should refer to ‘at least’ in respect of both the residual target and dwelling distribution for consistency with the overall target.

Council Response

1) The Council does not agree that there has not been a proper assessment of alternative locations for development. The Council is mindful of the conclusions of the Secretary of State concerning prematurity. The Council has considered and dismissed the option of building a new settlement compared with the preferred approach of greenfield releases on the edge of the main settlements. It stands by the conclusion that it would be preferable to meet its housing requirements in this way. Whilst the specific allocation of sites is not part of the Core Strategy, evidence shows a number of locations on the edge of Farnham and Cranleigh where development would be more closely integrated with the settlement and with easier access to local facilities etc. The Council also considered the suggestion of delivering a smaller number of homes at Dunsfold Park. Whilst the quantum of development would be less, there would still be the issue of having to travel away from the site to access a full range of services etc.

2) The Council’s Duty to Cooperate Report sets out how the Council has liaised and worked with other Local Planning Authorities on its Core Strategy.

3) It is not considered that the planned strategy requires a new settlement of the size previously proposed at Dunsfold Park. Even a lower level of development (such as 500 or 1,000 homes) would still be likely to result in an unsustainable development. 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.

4) The 230 dwellings per annum in Policy CS2 is the figure that was contained in the South East Plan before it was increased by the Secretary of State on the recommendation of the Examination in Public Panel. The Council considers that the approach strikes the right balance between delivering new homes needed in the area whilst recognising the rural character of the area and the various constraints including the Green Belt, landscape designations and biodiversity designations which together with limitations on access to services and public transport, restrict the suitability of land to accommodate new homes in a sustainable way.

5) Waverley is an attractive place to live which explains the strong demand for market

housing. Evidence of demand is 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. Evidence indicates that historically migration trends vary widely year on year, so care is needed in seeking to project how these trends will affect local population growth over the extended period of the Plan. The update to the Employment Land Review 2011 examined three different scenarios of employment demand growth over the period 2010 to 2027 to establish the amount of employment land to plan for: high growth, base demand and low growth. It then considered the housing implications of each scenario. Under the high growth scenario, Waverley would require 249 dwellings per year to accommodate the increase in the Borough's B use class employment over the period 2010 to 2027. Under the base scenario it would require 190 new homes a year and under the low growth scenario it would require 133 new homes a year. This analysis is based on a series of assumptions regarding levels of commuting, economic activity, unemployment rates and household size. The Employment Land Review recommends that the base scenario is the most appropriate scenario for Core Strategy policies to be based on. As indicated elsewhere, in setting the local housing target, a balance needs to be struck between the social, economic and environmental considerations.

6) The total number of the level of housing completions is set out in the Annual Monitoring Report.

7) The Council's approach to affordable homes in Policy CS5 of the Pre submission Core Strategy requires the provision of affordable homes on any development providing a net increase of one dwelling.

8) The development of sites detached from the built up area of settlements will result in further development encroaching into the countryside which will result in a significant change to the character and setting of that settlement. It could also put pressure on the land in between the site and the settlement for further development thus exacerbating the impact. As the evidence shows that there is sufficient land available for housing on sites physically adjacent to the four main settlements to meet the housing requirement, it is not necessary to allocate them for housing.

9) Farnham is the largest settlement in Waverley and the most sustainable in terms of the range of services, employment opportunities and access to public transport. Evidence does not indicate insurmountable problems in relation to infrastructure even taking into account planned developments outside Waverley. Agreed measures are in place to provide avoidance/mitigation measures, such that housing in Farnham would not have an adverse impact on the SPA. Natural England have not raised any concerns over the adequacy of Farnham Park as a SANG. It is recognised that to deliver the planned greenfield releases around Farnham further SANG will be required. However, it is considered that over the period of the Plan and informed by the site selection process; additional SANG to serve these greenfield releases will be identified.

10) Based on historic rates of housing delivery and current evidence of deliverable housing sites, including windfall sites, it is considered more than likely that housing delivery over the whole Plan period will exceed the target set out in the Core Strategy. The housing trajectory also demonstrates 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 additional greenfield sites will be identified but held in reserve to be brought forward in accordance with Policy CS2.

Implications for Core Strategy

No change

Name/Organisation	Dunsfold Park Ltd Dunsfold Park Ltd
Representation Number	CSPS467
Paragraph/ Policy	Policy CS2
Summary of Representation	See summary above, (CSPS470).
Changes Proposed by Representation	See above, (CSPS470).
Council Response	See Council's response to representations from Dunsfold Park above (CSPS470).
Implications for Core Strategy	No change

Name/Organisation	Mrs Zofia Lovell South Farnham Residents Association
Representation Number	CSPS459
Paragraph/ Policy	Policy CS2
Summary of Representation	<p>1) Policy CS2 is contrary to the NPPF which states that previously developed land should be prioritised before other land.</p> <p>2) The amount of SANG available is enough for 120 more houses. The Core Strategy does not show that SANG will be available prior to housing development to mitigate the impact on the SPA.</p> <p>3) Therefore in accordance with the HRA to ensure there is not an adverse impact on the SPA, alternative solutions should be used such as considering Dunsfold for housing in preference to the uncertainty of providing SANG for building in Farnham.</p>
Changes Proposed by Representation	1) The Council must not only acknowledge the difficulties outlined above, but prove that they are willing to accept and able to act upon alternative solutions.
Council Response	<p>1) Current evidence on deliverable sites shows a shortfall between what is expected to be delivered on potential housing sites within settlements and on rural brownfield land, and the overall target. Therefore, there is a 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>2) Natural England have not raised any concerns over the adequacy of Farnham Park as a SANG. It is recognised that to deliver the planned greenfield releases around Farnham further SANG will be required. However, it is considered that over the period of the Plan and informed by the site selection process; additional SANG to serve these greenfield releases will be identified.</p> <p>3) 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 the housing needs arising in the largest settlement. Agreed measures are in place to provide avoidance/mitigation measures, such that housing in Farnham would not have an adverse impact on the SPA. It is not considered that the planned strategy requires a new settlement of the size previously proposed at Dunsfold Park. Even a lower level of development (such as 500 or 1,000 homes) would still be likely to result in an unsustainable development. 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>
Implications for Core Strategy	No change

Name/Organisation	Charlotte Yarker Montagu Evans LLP
Representation Number	CSPS465
Paragraph/ Policy	Policy CS2
Summary of Representation	<p>1) Barton Wilmore's Open House Waverley borough Housing requirements Assessment provided evidence for why Waverley should revise their housing figures upwards to meet housing need and its aspirations for economic growth. The update of the Councils employment land review shows that an appropriate level of housing to meet the recommended job growth of 2,449 jobs up to 2027 to meet economic growth aspiration is needed. 230 dwellings per annum is too low to meet housing needs and economical growth and does not produce robust evidence to demonstrate why there will be unacceptable harm to the borough not to do so.</p> <p>2) The NPPF states that Councils should meet the full objectively assessed needs for housing in the market areas using up to date, adequate and relevant evidence. The SHMA identifies an annual need for 706 units to meet demand, of which 324 need to be affordable. The Council has a very high house price to income ratio and therefore are unaffordable. Therefore the Core Strategy needs to strike the right balance between the</p>

need to supply housing and environmental consideration.

3) The only CLG demographic projections shows housing demand and need is 9,000 dwellings (458 dwellings per annum). The open house assessment is more accurate tool to assess need and demand having regard to migration and considers 3 scenarios,

i) household growth based on lower levels of future long term net in- migration = 355 dwellings per annum,

ii) The level of labour required to meet job growth forecast = 492 dwellings per annum and

iii) The level of housing need that would stabilise the labour force over the plan in order to meet the Councils economic growth forecast = 583 dwellings per annum. The impact of under planning for homes is that both existing residents and in-migrants will suffer as house prices become unaffordable and therefore the supply of housing needs to be maximised to meet demand having regard to environmental constraints in line with the NPPF.

4) 230 dwellings per annum is an arbitrary approach and was considered inadequate by the Secretary of State, is below the level set out in the South East Plan of 250 dwellings per annum.

Changes Proposed by Representation

Council Response

1) The update to the Employment Land Review 2011 examined three different scenarios of employment demand growth over the period 2010 to 2027 to establish the amount of employment land to plan for: high growth, base demand and low growth. It then considered the housing implications of each scenario. Under the high growth scenario, Waverley would require 249 dwellings per year to accommodate the increase in the Borough's B use class employment over the period 2010 to 2027. Under the base scenario it would require 190 new homes a year and under the low growth scenario it would require 133 new homes a year. This analysis is based on a series of assumptions regarding levels of commuting, economic activity, unemployment rates and household size. The Employment Land Review recommends that the base scenario is the most appropriate scenario for Core Strategy policies to be based on. As indicated elsewhere, in setting the local housing target, a balance needs to be struck between the social, economic and environmental considerations.

2) The 230 dwellings per annum in Policy CS2 is the figure that was contained in the South East Plan before it was increased by the Secretary of State on the recommendation of the Examination in Public Panel. The Council considers that the approach strikes the right balance between delivering new homes needed in the area whilst recognising the rural character of the area and the various constraints including the Green Belt, landscape designations and biodiversity designations which together with limitations on access to services and public transport, restrict the suitability of land to accommodate new homes in a sustainable way.

3) Waverley is an attractive place to live which explains the strong demand for market housing. Evidence of demand is 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. Evidence indicates that historically migration trends vary widely year on year, so care is needed in seeking to project how these trends will affect local population growth over the extended period of the Plan.

4) Waverley is not within any 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. It is also considered that there is a reasonable case to revert to the South East Plan Option 1 figure of 230 homes a year 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.

Implications for Core Strategy

See updated paragraph 6.11

Name/Organisation	Cranleigh Consortium
Representation Number	CSPS46
Paragraph/ Policy	6.34
Summary of Representation	1) The approach to distributing greenfield release between Farnham and Cranleigh is supported (and Furze Lane) but it should not be an equal split. The approach should be to

	<p>balance the distribution of the total housing overall between the two settlements taking into account existing permissions, completions and SHLAA sites. This means that Farnham has been allocated the most, although it is more constrained by the SPA, Strategic Gap and ASVI.</p> <p>2) The Core Strategy should ensure that housing is distributed across a settlement rather than rely on one large site to lessen impact, and to offer choice and certainty of delivery.</p>
Changes Proposed by Representation	1) Increase housing number allocated to Cranleigh so that they have equal numbers overall of 1036. Re-adjust the greenfield releases accordingly.
Council Response	<p>1) Given the size of Cranleigh and in recognition of some of the constraints around Farnham it is considered that a 50:50 split in terms of the greenfield releases is appropriate. Policy CS2 sets out the full distribution of homes for each settlement taking into account the number of dwellings already completed, those already with planning permission or those from sites identified as potentially suitable for housing.</p> <p>2) 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 and development allocations should be made in a subsequent DPD which will identify specific sites for housing. The Core Strategy does provide clarity about how the Council will meet its housing requirements and Policy CS2 clearly sets out the broad location for development within the Borough.</p>
Implications for Core Strategy	No change

Name/Organisation	Lamron Estates
Representation Number	CSPS69
Paragraph/ Policy	6.34
Summary of Representation	1) The housing distribution figures are too inflexible.
Changes Proposed by Representation	
Council Response	1) The Core Strategy does provide clarity about how the Council will meet its housing requirements and Policy CS2 clearly sets out the broad location for development within the Borough. However, a specific amount of housing to be distributed to each broad location is required in order to provide certainty to communities and infrastructure providers and for the basis of the work on development allocations in a subsequent DPD that will identify specific sites for housing.
Implications for Core Strategy	No change

Name/Organisation	Cranleigh Parish Council Cranleigh Parish Council
Representation Number	CSPS134
Paragraph/ Policy	6.34
Summary of Representation	<p>1) Concerned about the impact of 433 new homes on greenfield sites in Cranleigh and this number should not be increased.</p> <p>2) There is no guidance where new homes should most suitably be located and therefore favours land to the south of the village</p>
Changes Proposed by Representation	1) Added protection for Cranleigh are required, and more attention to the impact of the proposed development on the village infrastructure, including transport.
Council Response	<p>1) It is acknowledged that Cranleigh is the smallest of the four main settlements in the Borough and it does not have a railway station. However, it does have access to other public transport, a wide range of services and good employment opportunities. As the countryside adjoining the edge of the village settlement is not within the Green Belt, AONB and AGLV it is considered that there is the potential for limited releases of land on the edge of Cranleigh to contribute to meeting the Borough overall target.</p> <p>2) 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 and development allocations should be made in a subsequent DPD which will identify specific sites for housing. The Core Strategy does provide clarity about how the Council will meet its housing requirements and Policy CS2 clearly sets out the broad location for development within the Borough. However it is considered reasonable to leave the specific identification of</p>

sites to the site allocations stage. Pending this, the Council is confident that it can demonstrate that it has a five year supply of land for housing.

Implications for Core Strategy	No change
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Name/Organisation	Cliff Watts Badshot Lea Community Association
Representation Number	CSPS150
Paragraph/ Policy	6.34
Summary of Representation	<p>1) 967 new homes on greenfield sites is contrary to the approach in the Core Strategy.</p> <p>2) 433 news homes in Cranleigh would have the same impact as developing at Dunsfold park which is a suitable location and accords with NPPF.</p> <p>3) 433 new homes at Farnham and Badshot Lea would exacerbate the detrimental impact on the area created by developments in neighbouring authorities and detrimentally affect the SPA which can not be overcome by mitigation measure. Be contrary to the aims of the Green Belt set out in the NPPF and resulting in urban sprawl and therefore there is a need to review the Greenbelt to protect Farnham.</p>
Changes Proposed by Representation	1) Housing distribution is dictated by the market rather than where there is a need. Review the Green belt.
Council Response	<p>1) The approach to greenfield sites in Policy CS2 accords with Policy CS1 which states that there will be limited releases of land on the edge of the main settlements and outside the Green Belt, AONB and AGLV.</p> <p>2) It is not considered that the planned strategy requires a new settlement of the size previously proposed at Dunsfold Park. Even a lower level of development (such as 500 or 1,000 homes) would still be likely to result in an unsustainable development. 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>3) Farnham is the largest settlement in Waverley and the most sustainable in terms of the range of services, employment opportunities and access to public transport. Evidence does not indicate insurmountable problems in relation to infrastructure even taking 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 the housing needs arising in the largest settlement. Agreed measures are in place to provide avoidance/mitigation measures, such that housing in Farnham would not have an adverse impact on the SPA.</p>
Implications for Core Strategy	No change

Name/Organisation	Mr Jesse Chapman D&M Planning
Representation Number	CSPS296
Paragraph/ Policy	6.34
Summary of Representation	<p>1) Housing numbers should be a minimum.</p> <p>2) There is no evidence or SA that edge of settlement greenfield releases are deliverable.</p> <p>3) New development is required at all locations not just within and around the main settlements.</p>
Changes Proposed by Representation	
Council Response	<p>1) Based on historic rates of housing delivery and current evidence of deliverable housing sites, including windfall sites, it is considered more than likely that housing delivery over the whole Plan period will exceed the target set out in the Core Strategy. The housing trajectory also demonstrates 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 additional greenfield sites will be identified but held in reserve to be brought forward in accordance with Policy CS2.</p> <p>2) Whilst the specific allocation of sites is not part of the Core Strategy, evidence shows a number of locations on the edge of Farnham and Cranleigh where development would be more closely integrated with the settlement and with easier access to local facilities.</p>

3) The Core Strategy directs development to within and on the edge of the built up areas of the Borough's main settlements because these are the most sustainable locations. However, policies also permit small scale development within the rural villages that have an existing defined settlement boundary to meet local needs and to maintain the vitality of the village. The figure of 12 new homes a year is not a specific figure for the village to plan for but an estimate of what may come forward from this source. The estimate is based on past trends of housing completions from the rural settlements from 2001 to 2012 following a discount of 25%. Furthermore where a local need has been identified, affordable housing schemes on the edge of villages may be permitted under Policy CS6. An amount has therefore also been estimated for rural exception sites in addition to the 12 homes a year within the settlements.

Implications for Core Strategy	No change
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Name/Organisation	West Cranleigh Nurseries / Knowle Park
Representation Number	CSPS370
Paragraph/ Policy	6.34
Summary of Representation	1) Distribution of housing and precise figures are inflexible and overly prescriptive and therefore do not positively plan. 2) The amount required on greenfield sites is determined by windfall estimates which have not been justified
Changes Proposed by Representation	
Council Response	1) Based on historic rates of housing delivery and current evidence of deliverable housing sites, including windfall sites, it is considered more than likely that housing delivery over the whole Plan period will exceed the target set out in the Core Strategy. The housing trajectory also demonstrates 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 additional greenfield sites will be identified but held in reserve to be brought forward in accordance with Policy CS2. 2) Historically many of the new homes that have been built in the Borough have been on windfall sites. Paragraph 48 of the NPPF states that Councils may make an allowance for windfall sites in the five year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Therefore, a windfall allowance based on past completions has been included in the Council's housing supply. The allowance however takes a precautionary approach and discounts the past completion rates by 25% in the event that the supply from this source is less than planned and to take account of the approach to garden land in paragraph 53 of the NPPF. Windfalls have not been included in the first three years of the Core Strategy (2012 to 2015) in order to avoid the risk of double counting with homes that already have planning permission. Policy CS2 also makes it clear that additional greenfield sites will be identified and held in reserve. They could then be considered for releases if evidence clearly shows that other sources of supply are not coming forward.
Implications for Core Strategy	No change

Name/Organisation	Mr Andrew Morris Bewley Homes Plc
Representation Number	CSPS391
Paragraph/ Policy	6.34
Summary of Representation	1) The approach to greenfield releases is supported but it is considered that the amount of housing specified in paragraph 6.34 should be in the policy rather than as supporting text. 2) The level of housing on greenfield sites will need to be revised (and consequently the numbers specified for each settlement) to reflect an increase in the housing target that is justified.
Changes Proposed by Representation	
Council Response	1) As the distribution of housing is set out in Paragraph 6.34 there is no need for this to be within Policy CS2 itself. 2) The 230 dwellings per annum in Policy CS2 is the figure that was contained in the South

East Plan before it was increased by the Secretary of State on the recommendation of the Examination in Public Panel. The Council considers that the approach strikes the right balance between delivering new homes needed in the area whilst recognising the rural character of the area and the various constraints including the Green Belt, landscape designations and biodiversity designations which together with limitations on access to services and public transport, restrict the suitability of land to accommodate new homes in a sustainable way.

Implications for Core Strategy	No change
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Name/Organisation	Hamlin Estates
Representation Number	CSPS404
Paragraph/ Policy	
Summary of Representation	<p>1) In principle the Council's approach to the location of housing and promote land off Hale Road, Farnham is supported.</p> <p>2) The amount of housing in the Core Strategy should be increased to 250 dwellings per annum in line with the South East Plan. The 2011 Census shows that population growth in the UK exceeded previous estimates uses in the South East Plan and therefore the amount of planning should reflect these updated figures.</p>
Changes Proposed by Representation	<p>1) The amount of housing in the Core Strategy should be increased to 250 dwellings per annum in line with the South East Plan. The 2011 census shows that population growth in the UK exceeds previous estimates used in the South East Plan and therefore the amount of housing should reflect these updated figures.</p>
Council Response	<p>1) 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 and development allocations should be made in a subsequent DPD which will identify specific sites for housing. The Core Strategy does provide clarity about how the Council will meet its housing requirements and Policy CS2 clearly sets out the broad location for development within the Borough. However, it is considered reasonable to leave the specific identification of sites to the site allocations stage. Pending this, the Council is confident that it can demonstrate that it has a five year supply of land for housing.</p> <p>2) Waverley is not within any 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. It is also considered that there is a reasonable case to revert to the South East Plan Option 1 figure of 230 homes a year 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>
Implications for Core Strategy	No change

7. Sustainable Transport

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
Cranleigh Parish Council	CSPS135	7.2	Requests study to bring light-rail link to Cranleigh.	Added protections for Cranleigh are required, and more attention to the impact of the proposed development on the village infrastructure, including transport.	Guildford-Cranleigh rail link was not considered a viable scheme.	None
Ms Kath Harrison Surrey County Council	CSPS272	7.3	Wording re: Surrey Bus Review should be updated.	Revised wording for Para 7.3: A review of bus services in Waverley was completed by Surrey County Council in 2012. Services have been re-evaluated to develop an overall network of public transport provision which is fit for purpose, more commercially viable and financially sustainable. All changes were introduced in September 2012.	Agree to update wording. Minor modification.	Amend para. 7.3 to read: "A review of bus services in Waverley was completed by Surrey County Council in 2012. Services have been re-evaluated to develop an overall network of public transport provision which is fit for purpose, more commercially viable and financially sustainable. All changes were introduced in September 2012."
Mrs Janet Dallas	CSPS4	7.3	No comment	None suggested	Noted	None
MR Trevor Goacher	CSPS61	7.3	Concern over Surrey Bus Review. Development in rural areas should be supported - would increase demand for rural public transport. Consider smaller buses for rural areas.	None suggested	Core Strategy seeks to focus development on more sustainable areas in main settlements. However, there will still be opportunities to develop within villages particularly where a need for affordable housing exists.	None
Mr Michael Nicholson	CSPS11	7.3	Concern over rural bus services, e.g.. no service on Sunday. Use smaller buses for rural routes off-peak.	None suggested	Noted - both issues raised are matters for SCC	None

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
Miss Jacki Larcombe	CSPS7	7.4	Buses are important for rural areas and should be extended, not cut.	If bus fares were reduced and bus routes extended, more people would use them.	Noted, however bus services are out of WBC's control and fall under SCC's responsibility. The policy does however state that the Council will work in partnership with SCC.	None
Mrs Celia Sandars	CSPS82	7.1	False assumption that public transport is available and adequate. Bus services around Farnham are inadequate particularly around south of town. No positive plan to improve services to link to station. Severe congestion and parking problems.	Policy should seek significant improvements to public transport within defined short timescale, working with Highways Authority and SCC.	Policy seeks contributions towards infrastructure and delivering the Surrey Transport Plan.	None
Miss Jacki Larcombe	CSPS8	7.11	Offering high-speed broadband as a means to cut down the need to travel is not only NOT cost effective, but lead people in rural areas to risk being isolated.	Spend money on roads and bus routes rather than high-speed broadband.	The Council has committed to working with partners to promote Smart Economic Growth in the Sustainable Employment Development policy which includes new working practises such as ICT developments and accessibility to high generation and next generation broadband. The issue of road quality and provision of bus services is a matter for SCC so is not something that would be dealt with through this document. However, the policy overall seeks to direct most new development to areas where there is the best access to services, including public transport.	None
Cranleigh Parish Council	CSPS136	7.11	Supports the provision of alternate ways of providing transport in rural areas such as dial-a-ride.	More attention to the impact of proposed development on transport needed	The evidence base includes Transport Assessment and Infrastructure Delivery Plan.	None
Ms Kath Harrison Surrey County Council	CSPS273	7.11	Suggests referring to Local Sustainable Transport Fund project at Haslemere.	Suggested wording for text: "Improved walking, cycling, bus and rail station interchange facilities are planned at Haslemere as part of the 'Local Sustainable Transport Fund' programme to support the economy and reduce carbon emissions. This is	Would be more appropriate for update of Infrastructure Delivery Plan.	None

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
				known as the 'Two Parks' project and aims to enhance access to and through the South Downs National Park using sustainable transport measures. The improvements in Surrey will be carried out by Surrey County Council working with a range of partners over a three year period from 2012/13 to 2014/15."		
Mrs Zofia Lovell South Farnham Residents Association	CSPS123	7.12	Questions strength of the Transport Evaluation conclusion that residential development up to 2026 would not have significant impact on road network in the Borough. Concern that Farnham has highest housing numbers. Delays at Farnham level crossing and proximity to Hickley's Corner.	Acknowledge constraints that Farnham will bear from existing and additional trips and cumulative impact of cross border development.	The modelling in the Transport Evaluation carried out by Surrey County Council has taken into account cross boundary developments.	None
Cranleigh Parish Council	CSPS137	7.12	Extra development will place increased demand on transport which is already at capacity at peak times.	Local transport infrastructure in Cranleigh should be evaluated.	The Infrastructure Delivery Plan and SCC Technical Note already assess transport across the main settlements.	None
Mr Martin Loxton Loxwood Parish Council	CSPS196	7.12	Insufficient information. 2500 houses at Broadbridge Heath, Horsham and PGA headquarters at Wildwood Golf Club, Alfold will have significant effect on A281 which is already congested.	None suggested	Cross boundary development including Broadbridge Heath was taken into account in the Transport Evaluation modelling.	None
Ms Jenny Hartley Loxwood Parish Council	CSPS232	7.12	Insufficient information. 2500 houses at Broadbridge Heath, Horsham and PGA headquarters at Wildwood Golf Club, Alfold will have significant effect on A281 which is already congested.	None suggested	Cross boundary development including Broadbridge Heath was taken into account in the Transport Evaluation modelling.	None
Cranleigh Parish Council	CSPS138	7.13	Extra development will place increased demand on transport which is already at capacity at peak times.	Local transport infrastructure in Cranleigh should be evaluated	The Infrastructure Delivery Plan and SCC Technical Note already assess transport across the main settlements.	None
Mr Pete Errington Hampshire County Council	CSPS182	7.13	Transport Evaluation fails to assess impact of development in Farnham on key routes in Hampshire such as A325, A287 and A31 and fails to identify mitigation measures in Hampshire.	Update Transport Evaluation to assess Hampshire main route corridors of A325, A287 and A31 and consider potential mitigation measures outside Waverley.	The Council, together with Surrey County Council who carried out the Transport Assessment, has met with Hampshire County Council to discuss the evidence base. The need for	None

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
					additional transport assessment work for the Whitehill Bordon and Aldershot Urban Extension has previously been acknowledged by Hampshire CC. The Council will continue to co-operate with Hampshire CC to resolve their concerns prior to Examination.	
Mrs Zofia Lovell South Farnham Residents Association	CSPS460	7.13	insufficient weight given and lack of solutions to traffic congestion from development in Farnham and cross boundary.	Waverley should take into more account planning activity cross boundary and identify solutions.	The Transport Evaluation takes into account cross boundary development. The Policy states that Waverley will work in partnership with the Highways Authority to mitigate impact. Potential solutions are identified in the SCC Technical Note and the Infrastructure Delivery Plan.	None
Cranleigh Parish Council	CSPS139	7.20	Welcomes the statement that improvements in sustainable travel should match new housing developments in Cranleigh.	Added protections for Cranleigh are required, and more attention to the impact of the proposed development on the village infrastructure, including transport.	Noted	None
Mr David Wydenbach Residents of Little Austins Road Farnham	CSPS58	7.21	Omission of composite parking strategy. Problems with on street parking, commuter parking, insufficient station parking	Add composite parking strategy.	Surrey County Council Highways department currently deal with the implementation of Controlled Parking Zones. The Council will work with SCC to implement transport initiatives identified in Local Transport Plan and in line with the Core Strategy vision.	None
Farnham Town Council	CSPS305	Policy CS3	Encouraging alternative transport to car is unrealistic. Bus transport will not replace cars until services are radically improved, probably by subsidy. Bus routes are few and facing cuts. Encouraging use of buses to meet trains only works if bus hours coincide with peak commuter travel to London and are reliable. Cycling in Farnham is difficult and dangerous - steep hills and congestion. Greenfield sites are out of town, away from shops, schools and	Policy should acknowledge existing situation. Include shops, schools and services in new housing developments on the edges of town, or bring new development within 500m of town centre which would be difficult in Farnham. Core Strategy ignores predicted increase in car use. Traffic plans should be required prior to construction. Policy should address pollution levels in Farnham.	Existing and predicted traffic situation has been assessed in Transport Evaluation and Infrastructure Delivery Plan. Policy CS4 requires development to provide or meet cost of providing necessary community facilities. Air pollution would be addressed through Air Quality Action Plan which is a criteria in Policy CS3.	No change

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
			services. Statement that transport impact of new development is "acceptable" is flawed. National Transport Model (NTM 2009) predicts increase in vehicle use of 7% between 2009-2015 and 18% by 2025. Lack of reference to traffic congestion and pollution.			
Mr David Beaman	CSPS332	Policy CS3	Consultation exercise for Core Strategy was insufficient. Summary document should have been produced. No evidence that there is either the resources available or political will to implement measures that will achieve sustainable transport within the period of the Plan. Concerns over cuts to bus services	Revise policy to make it clear that the achievement of sustainable transport will depend upon adequate financial resources being available and the political will also being necessary	Noted	No change
Mr Jerry Hyman	CSPS426	Policy CS3	Fails to comply with Air Quality Directives. Air Quality is major issue in Farnham due to congestion. Restriction on development around Farnham is the only available measure that would offset the worsening congestion and air quality. Therefore under Environment Act and Air Quality Directive WBC is obliged to restrict development until a traffic solution is found. AQAP is not included in supporting documents. Fails to comply with Para. 124 of NPPF.	States that Core Strategy requires complete revision. No specific changes suggested.	The Council is aware of its responsibilities under the Air Quality Directives. It is not considered that the Core Strategy conflicts with these responsibilities. Policy CS3 seeks to ensure that development schemes are consistent with the objectives and actions within the Council's Air Quality Action Plan.	No change
Jackie Hutton Dockenfield Parish Council	CSPS403	Policy CS3	Mitigating current and future needs should include allocation of housing as close to jobs as possible e.g. Dunsfold. Rural villages with almost no infrastructure and tiny roads should not be targeted by developers. The cross border Bordon ecotown transport may seriously affect west Waverley.	Reassess Dunsfold Park with improved road link. Rural villages policy should be restricted to focus on affordable homes and small business development. Encourage railway from Bordon.	These issues are addressed in the Council's responses to representations on Policies CS1 and CS2.	No change to Policy CS3.
A Dovey	CSPS24	Policy CS3	It does not acknowledge the transport issues that will arise due to	None suggested	The transport assessment takes account of cross-boundary transport	None

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
			development at e.g. Horsham and Bordon.		implications including Horsham and Bordon.	
Hambledon Parish Council	CSPS40	Policy CS3	It should be a pre-requisite that development proposals in rural areas should include proposals for the provision of adequate transport facilities.	It should be a pre-requisite that development proposals in rural areas should include proposals for the provision of adequate transport facilities.	Noted. Policy applies to all development.	None
Cllr David Munro	CSPS59	Policy CS3	Continue to press for major highway schemes to relieve congestion e.g.. Farnham Bypass at Hickley's Corner and Wrecclesham Relief Road. Manage HGV traffic. Require adequate parking at stations and major industrial complexes to minimise commuter parking in residential areas.	Continue to press for major highway schemes to relieve congestion e.g.. Farnham Bypass at Hickley's Corner and Wrecclesham Relief Road. Manage HGV traffic. Require adequate parking at stations and major industrial complexes to minimise commuter parking in residential areas.	The Council will continue to work with Surrey County Council to address these issues which are identified in the Surrey Transport Plan and Infrastructure Delivery Plan. However, the Transport Assessment considered the level of growth planned in the Core Strategy and does not identify any major highways/transport constraints that should limit the amount of development.	Implications to be considered
Dr David Savage Farnham Branch Labour Party	CSPS88	Policy CS3	Failed in "Duty to Co-operate". No co-operation between SCC and WBC on effects of major schemes. The preparation of the Strategy has not been objective e.g.. comments on air quality are inconsistent with reality. Strategy is inconsistent with objectives of Farnham Air Quality Management Plan. Strategy will result in more traffic and higher pollution levels. 2010 Transport Evaluation did not consider town centre development in Farnham	Transport Evaluation should consider town centre development in Farnham to develop strategy based on objective assessment.	There has been co-operation between SCC and WBC. SCC carried out the Transport Assessment of the Core Strategy. Air Quality has been considered and SCC have an Air Quality Strategy as part of the Local Transport Plan. Policy CS3 also has a criteria requiring development to be consistent with the objectives and actions within the Borough's Air Quality Action Plan.	Factual correction to criteria 7 of Policy CS3: replace "management" with "action" and add Waverley Air Quality Action Plan to Evidence Base list.
Mrs Zofia Lovell South Farnham Residents Association	CSPS125	Policy CS3	Questions Transport Evaluation. Existing congestion e.g. level crossing by station and proximity to Hockley's Corner is unlikely to be reduced.	Council must give weight to Transport issues when allocating land for development.	Noted	No change
Dr Thomas Lankester Transition	CSPS172	Policy CS3	Need to promote low carbon forms of transport and improve air quality.	Policy should require electric vehicle recharging points with commercial, retail, industrial developments. Council	The provision of charging points in public car parks is a separate matter for the Council to consider.	No change

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
Town Farnham				should be proactive in providing charging points at council offices and public car parks.		
Mr Pete Errington Hampshire County Council	CSPS181	Policy CS3	Transport Evaluation fails to assess impact of development in Farnham on key routes in Hampshire such as A325, A287 and A31 and fails to identify mitigation measures in Hampshire.	Update Transport Evaluation to assess Hampshire main route corridors of A325, A287 and A31 and consider potential mitigation measures outside Waverley.	Noted. Similar issue with current East Hants Core Strategy which has not identified full transport implications of Whitehill Bordon.	Address cross boundary issues prior to examination through ongoing dialogue.
Mr Andrew Whitaker Home Builders Federation Ltd	CSPS185	Policy CS3	In meeting forecast for 10,500 dwellings, Council may need to consider sites that do not accord with all requirements in Policy CS3. This should not prevent proposals that will assist in meeting housing needs.	None suggested	Noted	No change
Highways Agency	CSPS250	Policy CS3	No comments. Refer to letter dated 11 April 2012 regarding Revised Preferred Options consultation i.e.. "Pleased to see that the HA's recommendation from the last consultation has been addressed – i.e. to include reference to travel plans and transport assessments for sites that will generate significant volumes of traffic of have an impact on the SRN."	None suggested	Noted	No change
Mr Andrew Macleod Farnham Society/Tim Cox	CSPS287	Policy CS3	Policy is too general and needs to identify schemes. No mention of rail in policy.	Policy should include specific reference to highway rail and public transport policies and proposals to address existing problems at strategic level.	Noted. Infrastructure Delivery Plan and Surrey Transport Plan are appropriate documents to identify transport projects.	No change
West Cranleigh Nurseries / Knowle Park	CSPS371	Policy CS3	Transport infrastructure should be developed in tandem with development. Support development which improve transport infrastructure and promote non-car modes of transport. Council should commit to use of CPOs in assisting delivery of infrastructure.	None suggested	Noted	No change

8. Infrastructure, Services and Community Facilities

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Response	Changes Proposed by Representation	Council Response	Implications for Core Strategy
Mrs Celia Sandars	CSPS83	8.1	Inadequate future provision for schools. Farnham schools under pressure at primary and secondary level. Secondary pupils have been forced to bus out of area. Parents often refused the choice of a place at nearest school.	Waverley should be more insistent that Surrey County Council provides locally for demand.	The need for additional school places is identified in the Infrastructure Delivery Plan and Policy CS4 states that the Council will work with partners, eg. SCC, to ensure infrastructure is delivered to support development in the Core Strategy.	None
West Cranleigh Nurseries / Knowle Park	CSPS372	8.1	Viability of CIL and planning obligations should be considered.	Council may need to increase scale of development to ensure provision of infrastructure is self-financing and funding gaps are met.	In preparing the Core Strategy, the Council has given careful consideration to issues of viability.	None
Mr Paul Cowper	CSPS155	8.2	Public Houses and other community facilities should be protected to ensure their use cannot be changed without approval of LPA and local residents	Amend para. 8.2: "The Council supports retention of existing community facilities such as schools, post offices, public houses, shops, doctors' surgeries, branch libraries, village halls and other meeting rooms, petrol stations and garages. Before granting planning permission for a change of use or redevelopment which would result in the loss of any of these facilities, the Council will require compelling evidence that the facility is both no longer needed by the local community and is no longer commercially viable. If permission is granted for a change of use or redevelopment, preference will be given to the premises remaining in some form of community or employment use so long as this does not result in traffic, amenity, environmental or conservation problems."	Policy CS4 provides sufficient protection and a requirement for evidence to justify a change of use. These issues are addressed in the Council's response to representations on paras. 11.26 and 11.44 of the Core Strategy.	None
Mrs Sheila Smith	CSPS6	8.3	Pressure on state schools is a reflection of the cost of mortgages in parents being unable to send children to private	Refer to issue in Core Strategy	Changes in demand for state school provision has been assessed by Surrey County Council School Place Planning	None

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Response	Changes Proposed by Representation	Council Response	Implications for Core Strategy
			schools.		Team and feeds into Infrastructure Delivery Plan identifying need for additional places.	
Mrs Sheila Smith	CSPS10	8.3	Council should consult with Acute Hospital Boards eg. Hindhead Tunnel has affected workflow at Royal Surrey A&E	None	The PCT and NHS have been consulted as part of the Infrastructure Delivery Plan.	None
Mr Michael Nicholson	CSPS12	8.3	Money should be spent on Sunday bus service rather than inefficient use of money such as road sweepers clearing leaves.	None	Noted. However, this is not an issue for the Core Strategy.	None
Cranleigh Parish Council	CSPS140	8.6	There should be an assessment on impact of future development on local schools and infrastructure.	More attention to the impact of proposed development on the village infrastructure, including transport.	The impact of proposed housing levels has been made through the Infrastructure Delivery Plan in consultation with infrastructure providers including SCC School Place Planning and Highways, water and electricity providers.	None
Mrs Kathy Smyth Guildford and Waverley Friends of the Earth	CSPS266	8.7	Core Strategy fails to address social and community issues identified in Cranleigh, Godalming and Haslemere healthchecks eg. youth facilities. Dunsfold Park eco-settlement would have provided recreational facilities available to surrounding villages.	None	There have been opportunities for Town and Parish Councils and other local groups to identify and put forward infrastructure needs as part of the Core Strategy process. The policy seeks to meet the need for all types of infrastructure.	None
Ms Ginny Hall Mono Consultants	CSPS38	Policy CS4	There should be a telecommunications policy in the Development Management DPD.	Recommends wording for future policy in Development Management DPD	Noted. Not an issue for Core Strategy.	None
Hambleton Parish Council	CSPS41	Policy CS4	Policy CS4 should include a pre-requisite that development proposals in rural areas should include provision of adequate community facilities - eg doctors' surgeries, schools.	Amend Policy CS4 to require proposals in rural areas to include provision of adequate community facilities.	No change required. The requirement for development to contribute towards the provision of infrastructure across the borough is identified in Policy CS4. The Infrastructure Delivery Plan will be continuously updated to identify the infrastructure required.	None
Lamron	CSPS70	Policy CS4	Clarify that new development will be	Policy CS4, amend 1st sentence to read:	Do not agree it is necessary to insert	None

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Response	Changes Proposed by Representation	Council Response	Implications for Core Strategy
Estates			required to meet essential community needs.	"essential community needs arising from the proposal."	the word "essential". Policy considered to be sound as presently drafted.	
Mark Mathews Thames Water Plc	CSPS90	Policy CS4	Policy does not adequately ensure water supply and wastewater infrastructure is in place to service development and avoid sewage flooding, pollution or water shortages. Removal of South East Plan will leave gap in policy. Core Strategy should include policy to replicate issues covered in Sustainable Water Resources (NRM1) and Water Quality (NRM2). Development should be phased to allow for infrastructure to be planned, funded and delivered prior to occupation. Not possible to identify all water supply and wastewater/sewerage infrastructure required over plan period.	<p>Proposed wording for Policy CS4: Planning permission will only be granted for developments which increase the demand for off-site service infrastructure where:</p> <ol style="list-style-type: none"> 1. sufficient capacity already exists or 2. extra capacity can be provided in time to serve the development which will ensure that the environment and the amenities of local residents are not adversely affected. When there is a capacity problem and improvements in off-site infrastructure are not programmed, planning permission will only be granted where the developer funds appropriate improvements which will be completed prior to occupation of the development. <p>Proposed text: The Council will seek to ensure that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve all new developments. Developers will be required to demonstrate that there is adequate capacity both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing infrastructure. Where there is a capacity problem and no improvements are programmed by the water company, the Council will require the developer to fund</p>	Noted. Policy CS4 already addresses the issue of phasing: "Where the delivery of development is dependent upon key infrastructure provision, development may be phased to ensure the timely delivery of the infrastructure that will be necessary to serve it."	A more detailed policy may be considered through the Development Management and Site Allocations DPD.

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Response	Changes Proposed by Representation	Council Response	Implications for Core Strategy
				appropriate improvements which must be completed prior to occupation of the development.		
Cranleigh Parish Council	CSPS152	Policy CS4	Special schools should be provided as locally as possible	Added protections for Cranleigh are required, and more attention to the impact of the proposed development on the village infrastructure, including transport.	Noted. The Infrastructure Delivery Plan considers the need for infrastructure to support the Core Strategy. SCC Education would be responsible for delivering school places, including special schools.	None
Mr Andrew Whitaker Home Builders Federation Ltd	CSPS186	Policy CS4	Council has not assessed cumulative impact of policies on development viability.	Policy should address viability.	Noted. Viability is referred to in Policy CS4 and evidence base eg. Affordable Housing Viability Assessment considers infrastructure, SPA, sustainability in addition to Affordable Housing.	None
Farnham Town Council	CSPS306	Policy CS4	Many of the infrastructure problems are inadequately covered. Core Strategy should recognise constraints from existing deficiencies. Schools are over-capacity and children from Farnham have to travel to Camberley and Haslemere, which is not sustainable. Housing development outside centres do not include shops or schools.	None	The Core Strategy has been prepared in parallel with the IDP with the intent of identifying the key infrastructure required to support new development.	None
Mr Cain The Homes & Communities Agency	CSPS326	Policy CS4	Consider using wording in relation to development viability, such as that used in para. 9.19 relating to Affordable Housing.	The Council should consider using similar wording in relation to development viability to that used in para. 9.19 relating to Affordable Housing.	Noted. Policy CS4 refers to viability test, first para. Line 4 - "Where appropriate and viable".	None
UCA	CSPS341	Policy CS4	Policy should include reference to IDP.	Amend second sentence in Policy CS4 to include reference to Infrastructure Delivery Plan	Noted	Amend second sentence in Policy CS4 to include reference to Infrastructure Delivery Plan.
West Cranleigh	CSPS373	Policy CS4	Cost of infrastructure on viability has not been fully assessed which conflicts	None	In preparing the Core Strategy, the Council has given careful consideration	None

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Response	Changes Proposed by Representation	Council Response	Implications for Core Strategy
Nurseries / Knowle Park			with para. 173 of NPPF. Core Strategy may need to increase scale of development to ensure associated infrastructure costs together with affordable housing can be met without creation of funding gaps. Policy is vague and does not accord with NPPF.		to issues of viability.	
Ms Susan Solbra Southern Water	CSPS440	Policy CS4	It is not possible to identify upfront all investment that might be required over the Core Strategy due to 5 year planning periods for strategic infrastructure and local infrastructure is dependent on precise location of development. Policy is over-dependent on identifying all necessary investment within Infrastructure Delivery Plan.	Amend last 2 paragraphs of Policy CS4: "The Council will support the development of new services and facilities (including community facilities) where required and may safeguard land for infrastructure if identified by the Council and other service providers. Proposals for new infrastructure will be expected to maximise the dual use of facilities, e.g. the extended use of school sites for the benefit of the community. The Council will work with partners to ensure that facilities and infrastructure is provided in a timely and sustainable manner to support the development identified in this Core Strategy and subsequent DPDs. Where the delivery of development is dependent upon key infrastructure provision, development will be phased to ensure the timely delivery of the infrastructure will be necessary to serve it." The following new paragraph to Policy CS4 is proposed: "The Infrastructure Delivery Plan will play a key part in ensuring that the infrastructure required to serve new development is provided in parallel with development. However, it is not always possible to identify all the infrastructure required until specific development proposals come forward."	Noted	A more detailed policy may be considered through the Development Management and Site Allocations DPD.

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Mr Derrick Price	CSPS451	Policy CS4	Existing infrastructure problems in Farnham are not addressed. Additional capacity required at Farnham sewerage treatment plant. Traffic problems: Hickey's Corner; Farnham station level crossing; Guildford Road, Farnham traffic queues due to parking; Farnham circulatory system at capacity.	None suggested.	The Core Strategy has been prepared in parallel with the IDP with the intent of identifying the key infrastructure required to support new development.	None

9. Affordable Housing and Other Housing Needs

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
A Dovey	CSPS26	9.1	Considers it to be more helpful to quote the 'entry level' price for people trying to buy a home, rather than the average house price, as the range in prices within the Borough is massive. In Cranleigh an entry level home would be approximately £100,000.	None	The evidence suggests that the Borough wide entry level price for a 1 bedroom home is £134,000, a 2 bedroom home is £213,000, a 3 bedroom home is 282,000 and a 4 bedroom home is £396,000 (SHMA, 2009)	No change
Mr Charles Burton	CSPS3	9.1	Argue that rural areas and in particular the Green Belt area should be accounted for in a clearer wording of the document as a whole. Too many unscrupulous developers take advantage of legal loop holes. Example given of permitting a 'town' house design as an infill to an entrance to a field in Frensham and then moving the field entrance elsewhere.	(i) "Affordable housing should be in easy reach of amenities like Health Centres, shops etc" (ii) "Any building on Green Belt land should be expressly prohibited in the case of affordable housing unless in extreme exceptional circumstances" (example of exception - affordable housing and community shop built on the site of the old Frensham Garage. Considered good for the environment and of good design.)	The spatial strategy for Waverley promotes sustainable development, with the main focus of development being within the four main settlements. The approach to development in the villages is to allow for infilling and small scale development within the settlement boundaries identified under the Local Plan (2002) Policy RD2. The current Green Belt boundaries, shown on the Local Plan 2002 Local Plan proposals map will not be altered. Green Belt land continues to be protected against inappropriate development under national policy and as part of the proposed Policy CS1. It is clear under Policy CS6 that the Council will only allow a Rural Exception Site in exception circumstances to meet an identified need and where it meets the criteria set out within the policy.	No change
Mrs Zofia Lovell South Farnham Residents Association	CSPS461	9.1	In reference to the quoted Housing Needs Register, consider it helpful to know how many people are on multiple lists, how many are still in need of affordable housing and how many can justifiably claim Waverley connections. Consider that with neighbouring boroughs having extra capacity it would	Waverley should contact the people on their Housing Needs Register and check how many are still in need of affordable housing and how many can justifiably claim Waverley connections	The numbers quoted in paragraph 9.1 refer to the proportion of those on the Housing Needs Register who are considered to be in housing need with a local connection. More information on the Council's Housing Allocation Scheme is available online. The numbers quoted provide one aspect of	No change

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			be helpful to have a more accurate figure to plan.		the evidence of housing need to support the proposed affordable housing policy.	
Cranleigh Parish Council	CSPS141	9.2	Supports the need for substantial amounts of affordable housing to meet the requirements of existing residents of Cranleigh and to provide the accommodation for key workers and care workers.		Noted	No change
A Dovey	CSPS25	9.2	The term 'affordable' with respect to homes is not defined.	Use of the terms 'subsidised' or 'below market rent'	The definition of affordable housing for the purposes of the plan is in line with the definition provided in Annex 2 of the NPPF.	No change
Mrs Zofia Lovell South Farnham Residents Association	CSPS462	9.6	In order to be prepared, questions whether it would be sensible to make reference to the government's newly announced plans, whereby developers don't have to build affordable homes as part of their new developments? Argue that the impact of this on Waverley should be noted and the Council could put more effort into other schemes for increasing the number of homes.	Additional reference	This appears to refer to the proposal by government to facilitate appeals to the Secretary of State against a Section 106 agreement for affordable housing being built as part of the development. However, Councils are already able to renegotiate a Section 106 agreement on a voluntary basis. In addition both parties enter into the agreement voluntarily in the first place.	No change
Mr Philip Woodhams	CSPS173	Policy CS5	The policy is inconsistent with national policy (paragraph 50 of the National Planning Policy Framework), because it does not provide a robust case for allowing off-site provision on developments of 4 dwellings or less. This failure to properly interpret and implement national policy represents a failure to comply legally with the procedures of the relevant regulations governing preparation of Development Plan Documents.	The requirement for financial contribution from development falling within the net increase band of 1- 4 dwellings should be deleted from Policy CS5.	The NPPF requires the Council to set policies for meeting affordable housing need on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified and the agreed approach contributes to the objective of creating mixed and balanced communities. The results of the Affordable Housing Viability Assessment Update (2012) recommended that allowing a financial contribution on the small sites represents a more practical solution which is more consistently deliverable, whilst continuing to see all additional dwelling contribute to a very useful	No change

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					affordable housing enabling fund. This approach supports the requirement in the NPPF, ensuring that the viability, and subsequent deliverability of development is considered.	
Mr Andrew Whitaker Home Builders Federation Ltd	CSPS187	Policy CS5	<p>(i) In the proceeding text, the Council identifies the level of need for affordable housing. However, restricting the supply of housing land will have a truly detrimental effect on those in need of affordable housing.</p> <p>(ii) There is an inconsistency in identify affordable housing as a priority but not increasing overall provision.</p> <p>(iii) There is an inconsistency in acknowledging that the provision of affordable housing in the current economic climate is challenging (para 9.6), with the reduction of thresholds and the percentage required on sites (para 9.7) or that an increase in the requirement on large sites from 30%-40% should not have an unacceptable impact in terms of development viability.</p> <p>(iv) This is considered to be an unrealistic and inconsistent approach to development viability.</p> <p>(v) Need to consider recent publications on assessing the viability of development, such as 'Viability Testing Local Plans' published by the Local Housing Delivery Group in June 2012.</p>		See also the response to this respondent's comments on Chapter 6 and Policy CS2. The findings of the Affordable Housing Viability Assessment (2009) and Update (2012) supports the affordable housing requirement as set out in the policy. Setting this type of policy is a requirement of the NPPF. However, in line with paragraph 173 of the NPPF and the recommendations of the AHVA (2012), the Council has acknowledged within the supporting text of the policy that there may be exceptions whereby the specific circumstances could mean achieving the required level of affordable housing would compromise development viability. In accordance with the NPPF, the evidence on viability produced to support this policy has taken into account the combined impact of providing affordable housing alongside other development costs, including wider planning obligations (e.g. Planning Infrastructure Contributions and the forthcoming potential Community Infrastructure Levy).	No change
Mr BRIAN KEEN	CSPS237	Policy CS5	It does not seem reasonable or equitable to contribute 10% of the cost of affordable housing for an application to build one property, thus making that property 'unaffordable'. This is just another hidden tax.		The findings of the Affordable Housing Viability Assessment Update (2012) supports the affordable housing requirement as set out in the policy. Where it is identified that there is a need for affordable housing, setting this type of policy is a requirement of	No change

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Central Land Holdings Ltd	CSPS257	Policy CS5	Object, on the grounds that is unsound as it is not consistent with national policy. An increase in the percentage allocation of affordable housing would seriously impact on the economic viability of development schemes and as such cannot be advocated as a method of increasing housing provision. The NPPF is clear a planning obligation placed upon development must not impact on viability, ensuring competitive returns to willing landowners and developers.		the NPPF. The findings of the Affordable Housing Viability Assessment (2009) and Update (2012) supports the affordable housing requirement as set out in the policy. Setting this type of policy is a requirement of the NPPF. However, in line with paragraph 173 of the NPPF and the recommendations of the AHVA (2012), the Council has acknowledged within the supporting text of the policy that there may be exceptions whereby the specific circumstances could mean achieving the required level of affordable housing would compromise development viability. If the Council is satisfied then negotiations will take place to secure the appropriate level of provision.	No change
A Dovey	CSPS27	Policy CS5	The housing list does not relate to the number of homeless.		The numbers quoted in paragraph 9.1 refer to the proportion of those on the Housing Needs Register who are considered to be in housing need with a local connection, this includes emergency and high priority applicants. More information on the Council's Housing Allocation Scheme is available on the Waverley website. The numbers quoted provide one aspect of the evidence of housing need to support the proposed affordable housing policy.	No change
Mr Jesse Chapman D&M Planning	CSPS295	Policy CS5	Requiring provision of affordable housing or a commuted sum on all sites will make many of them unviable. A significant proportion of deliverable sites over the last 10 years has been provided on smaller sites, up to 3 dwellings. The combination of providing	Affordable housing provision considered on a site by site basis.	The findings of the Affordable Housing Viability Assessment (2009) and Update (2012) supports the affordable housing requirement as set out in the policy. Setting this type of policy is a requirement of the NPPF. However, in line with paragraph 173 of the NPPF	No change

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			<p>affordable housing with both Community Infrastructure Levy and SANGS (in some areas) will make these sites deliverable in the short, medium and long term. Question whether the commuted sum approach will meet the tests required for section 106 agreements, with robust evidence of housing need in particular areas. Consideration will need to be made regarding the monitoring of these pooled contributions and subsequent delivery.</p>		<p>and the recommendations of the AHVA (2012), the Council has acknowledged within the supporting text of the policy that there may be exceptions whereby the specific circumstances could mean achieving the required level of affordable housing would compromise development viability.</p>	
Farnham Town Council	CSPS307	Policy CS5	<p>(i) Argues that whilst the Council has made reference to a total of 1500 homes with a local connection in need on the Housing Needs Register (para 9.1), a reduction of 2000 from the total figure quoted of 3500. It has not reduced the total housing target by a total of 1500 nor has there been any explanation for the retention of the total target.</p> <p>(ii) Consider there is no evidence that increasing the percentage of affordable housing 'should not have an unacceptable impact' as stated (para 9.8). In preparing the Farnham Neighbourhood Plan developers have identified this as having a very serious effect on viability.</p> <p>(iii) Of interest, the East Street development in Farnham is required to meet a target of 30% only despite being a town centre development.</p> <p>(iv) developments of market and affordable housing works in practice, because it is preferable to build affordable housing on less expensive land and market housing on expensive land. This requirement affects viability</p>	<p>Affordable housing provision considered on a site by site basis.</p>	<p>The findings of the Affordable Housing Viability Assessment (2009) and Update (2012) supports the affordable housing requirement as set out in the policy. Setting this type of policy is a requirement of the NPPF. However, in line with paragraph 173 of the NPPF and the recommendations of the AHVA (2012), the Council has acknowledged within the supporting text of the policy that there may be exceptions whereby the specific circumstances could mean achieving the required level of affordable housing would compromise development viability. In Para 9.1, the Council has broken down the overall figure to demonstrate the proportion of households proportion of those on the Housing Needs Register who are considered to be in housing need with a local connection. However, the numbers quoted only represent one aspect of the evidence of housing need to support the proposed affordable housing policy and it remains the case that there is a high level of need for affordable housing in the Borough. The current approach to providing</p>	<p>No change</p>

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			and restricts building opportunities. In addition there is no evidence that this type of social engineering works.		affordable housing on site is well established and national policy continues to support the approach in order to meet the objective of creating mixed and balanced communities.	
Mr Cain The Homes & Communities Agency	CSPS329	Policy CS5	For Policy CS5 to accord with the NPPF (paragraphs 50, 173 and 174) to reflect the need for flexibility in regard to affordable housing provision to take account of changing market conditions, consider that the exception referred to in paragraph 9.19 should be within the main policy text after paragraph 9.15.	We suggest the addition of "where developers consider the level of affordable housing would compromise development viability, then proposals will need to be accompanied by appropriate financial evidence to support an application."	The paragraph numbers referred to appear to relate to the Core Strategy - Revised Preferred Options and Draft Policies (February 2009). The corresponding paragraphs in the Core Strategy Pre-Submission document (August 2012) are paragraph 9.13 rather than 9.19 and the policy text following paragraph 9.8 rather than 9.15. The findings of the Affordable Housing Viability Assessment (2009) and Update (2012) supports the affordable housing requirement as set out in the policy. Setting this type of policy is a requirement of the NPPF. However, in line with paragraph 173 of the NPPF and the recommendations of the AHVA (2012), the Council has acknowledged within the supporting text of the policy that there may be exceptions whereby the specific circumstances could mean achieving the required level of affordable housing would compromise development viability.	No change
West Cranleigh Nurseries / Knowle Park	CSPS375	Policy CS5	(i) Not in accordance with the NPPF as there is no inclusion of 'subject to viability' within the policy wording. (ii) Calculations of percentages are considered premature given that more details on Policy CS5 and CS6 will be provided in a subsequent SPD. (iii) Should consider a wider use of housing tenures, including consideration of Open Market Rental,		The findings of the Affordable Housing Viability Assessment (2009) and Update (2012) supports the affordable housing requirement as set out in the policy. Setting this type of policy is a requirement of the NPPF, which states that where a need for affordable housing is identified, policies should be set for meeting this need on-site, therefore the inclusion of a policy	No change

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			<p>Shared Equity and Self Build as valid ways of increasing variety of tenures on offer.</p> <p>(iv) Not in accordance with NPPF on evidence base grounds.</p>		<p>which states the required proportion of affordable homes which should be delivered on sites is not considered premature. However, in line with paragraph 173 of the NPPF and the recommendations of the AHVA (2012), the Council has acknowledged within the supporting text of the policy that there may be exceptions whereby the specific circumstances could mean achieving the required level of affordable housing would compromise development viability. If the Council is satisfied then negotiations will take place to secure the appropriate level of provision.</p> <p>The types of housing considered to be affordable for the purposes of the plan is in line with the definition provided in Annex 2 of the NPPF.</p>	
Mr Andrew Morris Bewley Homes Plc	CSPS395	Policy CS5	The current policy wording does not refer to the need to negotiate the requirements due development viability. This ignores the statement in the NPPF (para 50), it is therefore in conflict with national policy.	The wording of the draft policy should be amended to include explicit reference to changing market conditions that may justify a reduced provision of affordable housing on any given residential development.	The findings of the Affordable Housing Viability Assessment (2009) and Update (2012) supports the affordable housing requirement as set out in the policy. Setting this type of policy is a requirement of the NPPF. However, in line with paragraph 173 of the NPPF and the recommendations of the AHVA (2012), the Council has acknowledged within the supporting text of the policy that there may be exceptions whereby the specific circumstances could mean achieving the required level of affordable housing would compromise development viability.	No change
Jackie Hutton Dockenfield Parish Council	CSPS397	Policy CS5	Affordable housing is almost the most critical resource needed in the south of England. There is a poor mismatch between desired housing [from developers] and the needs for small	Full market housing should be positively resisted in rural villages until the affordable/small backlog has been met [eg in 5 years time], even if it results in less profit for developers. Alternatively,	The approach to providing affordable housing on development sites strikes a balance between meeting the need for affordable housing and the what is deliverable on sites in terms of	No change

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			homes for especially local people in rural villages where enlargement has made almost all homes unaffordable to normal/young workers. Infilling/new market developments are inconsistent with the need for vibrant rural mixed communities to include young and less affluent people, including key workers.	in rural developments at least 50% should be affordable.	viability, to ensure that sites continue to come forward. In addition to this policy, Policy CS6 provides the opportunity for rural exception sites to come forward in rural areas where there is a demonstrated local need for affordable homes.	
Martin Grant Homes Ltd	CSPS411	Policy CS5	See comments made on Policies CS1 and CS2. The Core Strategy is not considered to deliver the necessary numbers of houses to meet the defined shortage of both open market and affordable homes in the Borough.	See comments made on Policies CS1 and CS2.	See separate response to representation from Martin Grant Homes on policies CS1 and CS2.	No change
Bloor Homes	CSPS414	Policy CS5	A blanket affordable housing requirement is considered to be an inflexible approach, which does not adequately reflect market conditions and recent government guidance. Other development costs, such as remediation, should be considered to ensure the development is viable.	Policy CS5 should be revised to allow some flexibility in the requirement for affordable housing, accounting for viability, to ensure that residential development can be delivered, otherwise the policy is inconsistent with the requirements of the NPPF and is therefore unsound.	The findings of the Affordable Housing Viability Assessment (2009) and Update (2012) supports the affordable housing requirement as set out in the policy. Setting this type of policy is a requirement of the NPPF. However, in line with paragraph 173 of the NPPF and the recommendations of the AHVA (2012), the Council has acknowledged within the supporting text of the policy that there may be exceptions whereby the specific circumstances could mean achieving the required level of affordable housing would compromise development viability. In accordance with the NPPF, the evidence on viability produced to support this policy has taken into account the combined impact of providing affordable housing alongside other development costs, including wider planning obligations (e.g. Planning Infrastructure Contributions and the forthcoming potential Community Infrastructure Levy)	No change

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Mr Norman Gillan Mono Consultants Ltd	CSPS425	Policy CS5	<p>(i) Without a higher overall housing target, Waverley will not deliver the number of affordable units required in the area.</p> <p>(ii) The affordable housing requirement will need to be applied in a flexible manner to take account of the NPPF and emerging problems in relation to the delivery and viability of housing schemes, especially in the current market.</p>		<p>See also responses to this respondent's comments on Policy CS2. The findings of the Affordable Housing Viability Assessment (2009) and Update (2012) supports the affordable housing requirement as set out in the policy. Setting this type of policy is a requirement of the NPPF. However, in line with paragraph 173 of the NPPF and the recommendations of the AHVA (2012), the Council has acknowledged within the supporting text of the policy that there may be exceptions whereby the specific circumstances could mean achieving the required level of affordable housing would compromise development viability. In accordance with the NPPF, the evidence on viability produced to support this policy has taken into account the combined impact of providing affordable housing alongside other development costs, including wider planning obligations (e.g. Planning Infrastructure Contributions and the forthcoming potential Community Infrastructure Levy)</p>	No change
Mr John Kelly Berkeley Strategic	CSPS442	Policy CS5	<p>(i) The policy is not sound as it is not justified or consistent with national policy. Concerned that Policy CS5 does not provide the required flexibility to take into account market conditions and would argue that rigid thresholds are likely to compromise development viability, and as a result decrease housing delivery.</p> <p>(ii) Makes reference to the conclusions of the Affordable Housing Viability Assessment Update (AVHAU) 2012, which makes clear that it should be recognised that not all sites will be able</p>	<p>Viability considerations including the recognition of impact from collective costs, should be explicitly recognised in the text of Policy CS5 to ensure flexibility in the policy's application. Suggest the following additional wording is added within the policy text: "Exceptions will be made to the above provisions if it can be demonstrated that the level of provision makes a development unviable. In such situations developers and Waverley Borough Council will work together to secure an appropriate level of provision</p>	<p>The findings of the Affordable Housing Viability Assessment (2009) and Update (2012) supports the affordable housing requirement as set out in the policy. Setting this type of policy is a requirement of the NPPF. However, in line with paragraph 173 of the NPPF and the recommendations of the AHVA (2012), the Council has acknowledged within the supporting text of the policy that there may be exceptions whereby the specific circumstances could mean achieving the required level of affordable housing would compromise</p>	No change

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
			<p>to meet the prescribed provision due to variable site specifics and flexibility needs to be written into the policy alongside acknowledgement of the need to negotiate.</p> <p>(iii) Argue that the policy should have consideration to the effects of other section 106 and CIL costs on affordable housing.</p>	<p>or financial contribution taking into account the cumulative impact of other costs including S106 and CIL."</p>	<p>development viability. In accordance with the NPPF, the evidence on viability produced to support this policy has taken into account the combined impact of providing affordable housing alongside other development costs, including wider planning obligations (e.g. Planning Infrastructure Contributions and the forthcoming potential Community Infrastructure Levy)</p>	
Mr Matthew Pardoe Signet Planning	CSPS448	Policy CS5	<p>The Policy as worded does not reflect the guidance provided by the NPPF or various ministerial statements that acknowledge the significant issue of viability for residential schemes, which has taken on a greater imperative in the light of the current prolonged economic downturn.</p>	<p>The policy specifically needs to refer to ensuring viability in order to provide the assurances required to land owners and/or developers that enable housing to be delivered. It is also suggested that the ability to provide a contribution for schemes of more than four units may assist this, and the policy should be amended to reflect this.</p>	<p>The findings of the Affordable Housing Viability Assessment (2009) and Update (2012) supports the affordable housing requirement as set out in the policy. Setting this type of policy is a requirement of the NPPF. However, in line with paragraph 173 of the NPPF and the recommendations of the AHVA (2012), the Council has acknowledged within the supporting text of the policy that there may be exceptions whereby the specific circumstances could mean achieving the required level of affordable housing would compromise development viability.</p>	No change
F & C Reit	CSPS463	Policy CS5	<p>(i) The policy is unsound in that it is not compliant with National Policy as it does not allow for the provision of affordable housing to be subject to the testing of the viability of its delivery (reference to paragraphs 50, 173, 174 and footnote 11 of the National Planning Policy Framework). If there is no inclusion of 'subject to viability' within the policy wording, then sites will not come forward and the plan will not be deliverable.</p> <p>(ii) Makes reference to the government consultation on the renegotiation of</p>	<p>Recommend the following wording is added to the policy text: "In seeking affordable housing provision the Borough Council will assess scheme viability, including assessing the overall mix of affordable unit size and tenure, other development scheme costs."</p>	<p>The findings of the Affordable Housing Viability Assessment (2009) and Update (2012) supports the affordable housing requirement as set out in the policy. Setting this type of policy is a requirement of the NPPF. However, in line with paragraph 173 of the NPPF and the recommendations of the AHVA (2012), the Council has acknowledged within the supporting text of the policy that there may be exceptions whereby the specific circumstances could mean achieving the required level of affordable housing would compromise</p>	No change

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
			<p>section106 planning obligations held in August 2012 and the letter sent from to all Local Authorities in March 2011 encouraging them to consider carefully if renegotiation of planning obligations was appropriate in order to stimulate development.</p>		<p>development viability. This appears to refer to the proposal by government to facilitate appeals to the Secretary of State against a Section 106 agreement for affordable housing being built as part of the development. However, Councils are already able to renegotiate a Section 106 agreement on a voluntary basis. In addition both parties enter into the agreement voluntarily in the first place.</p>	
Mrs Sheila Smith	CSPS5	Policy CS5	<p>Request more clarification on what 'affordable housing' is, including how many homes will be built, what proportion are for part-ownership of some kind and what restrictions is there on the resale price of such housing if it subsequently vacated.</p>		<p>The definitions of affordable housing used for this policy are in line with the definition of affordable housing outlined in Annex 2 of the NPPF (2012) (see footnote xii). The NPPF states that affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision. The tenure split of developments is dealt with within the policy.</p>	No change
Mrs Vivienne Legge	CSPS56	Policy CS5	<p>(i) Expresses concern regarding the impact of affordable housing on sites coming forward for development. (ii) The combined impact of affordable housing provision along with a list of council and government requirements (e.g. infrastructure charges and survey requirements) results in a long and costly process, which results in few smaller sites being viable, leading to high house prices, lack of choice and larger developments.</p>		<p>The findings of the Affordable Housing Viability Assessment (2009) and Update (2012) supports the affordable housing requirement as set out in the policy. Setting this type of policy is a requirement of the NPPF. However, in line with paragraph 173 of the NPPF and the recommendations of the AHVA (2012), the Council has acknowledged within the supporting text of the policy that there may be exceptions whereby the specific circumstances could mean achieving the required level of affordable housing would compromise development viability. In accordance with the NPPF, the evidence on</p>	No change

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
					viability produced to support this policy has taken into account the combined impact of providing affordable housing alongside other development costs, including wider planning obligations (e.g. Planning Infrastructure Contributions and the forthcoming potential Community Infrastructure Levy)	
Lamron Estates	CSPS71	Policy CS5	(i) Insufficient attention is paid to viability which should be clearly referred to in the policy wording, as per NPPF and related ministerial guidance. (ii) Financial contributions should be allowed for all sites of less than 15 units in order to promote the viability and deliverability of small housing sites.		The findings of the Affordable Housing Viability Assessment (2009) and Update (2012) supports the affordable housing requirement as set out in the policy. Setting this type of policy is a requirement of the NPPF. However, in line with paragraph 173 of the NPPF and the recommendations of the AHVA (2012), the Council has acknowledged within the supporting text of the policy that there may be exceptions whereby the specific circumstances could mean achieving the required level of affordable housing would compromise development viability. Paragraph 9.11 does explain that the presumption if that affordable housing will be provide on-site in line with NPPF, however where it can be robustly justified off-site provision or a payment in lieu may be accepted.	No change
Mrs Celia Sandars	CSPS84	Policy CS5	Support the new policies for levels of contributions of affordable housing and would not wish these to be watered down.		Noted	No change
Thursley Parish Council	CSPS216	Policy CS6	Concern that this policy will allow the settlement boundaries to be extended. This could be subject to considerable abuse and threaten the integrity of village boundaries, leading to village	The whole of the latter half of the policy should be reconsidered.	The Council has been careful to ensure that the provision of market housing on rural exception sites is allowed only in exceptions circumstances where it is demonstrated that it is required to	No change

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
			<p>sprawl and the loss of open countryside. The policy would appear to permit any owner of land adjoining or "closely related" to the village to build a substantial market house provided part of the land was made available free for affordable.</p>		<p>ensure the viability of the scheme and that the number of open market dwellings included in the scheme is the minimum required to provide the necessary number of affordable dwellings. The wording of the policy and the supporting text sets our clear criteria by which an application for this type of scheme will be judged.</p>	
Dunsfold Parish Council	CSPS284	Policy CS6	Supports the policy.		Noted	No change
Mr Colin Hall CPRE SURREY	CSPS300	Policy CS6	<p>Policy CS6 is unsound insofar as it extends the rural exceptions policy to market homes. This could be subject to considerable abuse and threaten the integrity of all village boundaries, leading to village sprawl, damage to the character of the village and the loss of open countryside. The policy would appear to permit any owner of land adjoining or "closely related" to the village to build a [large] market house provided part of the land was made available free for affordable housing (no doubt at a distance from the market house). Argues that this is likely to result in a significant increase in applications, due to the uplift in value from allowing market housing, and therefore will threaten existing village boundaries.</p>	<p>We believe that the whole of the latter half of the policy should be deleted .If it is to be retained, we consider that the Policy should be considerably tightened up by providing</p> <p>(i) as specified in paragraph 9.19, that the provision of free or low cost land is not sufficient on its own to justify the open market housing.</p> <p>(ii) that the size of the open market dwellings as well as their number must be the minimum required to provide the affordable homes</p> <p>(iii) that the scheme should have local support through the Parish Council or Neighbourhood Plan.</p>	<p>The Council has been careful to ensure that the provision of market housing on rural exception sites is allowed only in exceptions circumstances where it is demonstrated that it is required to ensure the viability of the scheme and that the number of open market dwellings included in the scheme is the minimum required to provide the necessary number of affordable dwellings. The wording of the policy and the supporting text sets our clear criteria by which an application for this type of scheme will be judged.</p>	No change
Mr Andrew Morris Bewley Homes Plc	CSPS396	Policy CS6	Supports the policy. In accordance with national policy and considered to be an important addition to the policy that will enable the delivery of affordable housing in locations that might not otherwise be provided with such provision.		Noted	No change

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
Mr Clive Smith	CSPS36	9.18	Small scale affordable housing meeting Policy CS6 can be supported in the Surrey Hills AONB and the AGLV provided that it would clearly support the social well being of the AONB and would not conflict with the aim of conserving and enhancing natural beauty (reference made to the Surrey Hills Management Plan Policies LU7 and CD2). The provision of any affordable housing within, adjoining or closely related to existing rural settlements in the AONB or AGLV will only be supported subject to proven local need and the landscape protection safeguards within the policy. Further it will be expected that watertight restrictions are imposed to ensure that the dwellings remain in perpetuity for local people even if other provisions subsequently allow a relaxation.	A new paragraph should perhaps be included to explain this approach. Further that schemes that include a proportion of market housing on exception sites in the AONB or AGLV will be particularly critically assessed from the aspect of landscape impact and character of the settlements in the AONB and AGLV.	Planning applications are considered in the context of the wider development plan, therefore once adopted any proposals for rural exception sites in the AONB and AGLV should be considered in the context of current national policy and the criteria set out in Policy CS15: Landscape Character. The policy states that developments considered under the policy will only be permitted, provided that management arrangements exist to ensure that all of the affordable dwellings remain available on this basis to local people in perpetuity.	No change
Cranleigh Parish Council	CSPS142	9.21	Care workers should be considered in the list of those with special housing needs.		Policy CS7 encourages the provision of lower cost market housing. In addition, Policy CS5 aims to increase the provision of affordable homes on development sites. This will assist in providing housing for key workers, including those on lower incomes.	No change
Mr Charles Burton	CSPS17	9.21	Missing group people requiring affordable housing (people who are disabled/have disabilities).	Make reference to people who are disabled/have disabilities.	Policy CS7 does encourage the provision of new developments incorporating 'Lifetime Homes' principles within the design so that they can be readily adapted to meet the needs of older people and those with disabilities.	No change
UCA	CSPS342	9.21	The University is pleased that the Council has recognised the housing needs of the University's students.		Noted	No change

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
Mr Andrew Macleod Farnham Society/Tim Cox	CSPS231	9.23	Concerned that the implications of the potential expansion of the UCA in Farnham are not adequately addressed in the Core Strategy and deals only with unspecified scale or number increase of students and their associated accommodation needs. Raises issues regarding incompatible lifestyles with other residents and areas becoming demonstrated by student accommodation. Therefore, argue that reliance must not be on solely on using the existing housing stock and provision needs to made for more purpose built student housing on the campus. This paragraph partly raises the issue but there is not policy response to it other than support for the provision of accommodation for students. Given the key importance of the University in Farnham, failure to deal with this issue is a serious weakness of the CS.	A specific policy relating to the University and its future growth 2. A clear intention to develop an approach to future student accommodation and the monitoring of the changing use of residential property for students to provide early warning of potential problems.	Whilst it is acknowledged that the University is intending to increase student numbers in Farnham, the expansion of the university has not yet been fully quantified. The Council will continue to work closely with the University to consider the future provision of accommodation for students. Policy CS7 supports the provision of accommodation designed to mee the identified needs of students. Any detailed requirements that emerge may be considered through the preparation of the Development Management and Site Allocations DPD.	No change
UCA	CSPS343	9.23	Recommend amendment to the existing text regarding UCA expansion.	The second and third sentences should be replaced with "UCA will not have any students at Maidstone after July 2014, and as it still wishes to increase student numbers, it is therefore expected that there will be a greater number of students studying at the Farnham Campus, with an associated increase in the demand for student accommodation."	This update to the wording is accepted.	Replace the second and third sentences of paragraph 9.23 with: "UCA will not have any students at Maidstone after July 2014, and as it still wishes to increase student numbers, it is therefore expected that there will be a greater number of students studying at the Farnham Campus, with an associated increase in the demand for student accommodation."

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McCarthy and Stone Retirement Lifestyles Ltd	CSPS14	Policy CS7	We are pleased by the addition of consideration to Older Persons accommodation in Policy CS7.	We would welcome the addition of reference to Extra Care or specialist retirement accommodation in this policy but are content that this policy suitably considers the housing requirements of older people in the Borough of Waverley.	Noted	No change
Mr Andrew Whitaker Home Builders Federation Ltd	CSPS188	Policy CS7	The Federation questions the need for a policy of this nature. Developers seek to identify the range and types of housing that are appropriate for any site and consider information from a variety of sources. The Council can therefore be helpful in this respect. It is important for both the developer and the Council that sites should help meet market demand. Developers should not, however, be forced to provide specific types of houses in order to satisfy the Council that balanced communities are being created. If the Council is intent upon having a policy on this matter, then it should be made clear that it will be operated in a flexible and realistic manner.		The NPPF requires local planning authorities to plan for a mix of housing to meet the needs of different groups in the community.	No change
UCA	CSPS344	Policy CS7	The University is pleased that the Council has recognised the housing needs of the University's students.		Noted	No change
Mr John Kelly Berkeley Strategic	CSPS443	Policy CS7	(i) Concern that the evidence underpinning the housing type and size referred to in Policy CS7 is the Strategic Housing Market Assessment (SHMA), which was undertaken in 2009 and is now 3 years out of date. (ii) argue that over the lifetime of the plan, local evidence other than the SHMA may become available which would reflect the most up to date evidence on housing need in terms of	Suggest that the text of Policy CS7 is amended to allow a degree of flexibility in terms of consideration of updated evidence. Proposes the following amendments to Policy CS7. The Council will require proposals for new housing to make provision for an appropriate range of types and sizes of housing to meet the needs of the community, reflecting the most up to date evidence either in an updated Strategic Housing	The policy wording is considered to be sufficiently flexible and the reference to the Strategic Housing Market Assessment is considered generic, therefore enabling reference to future updates of this evidence. The NPPF refers to the use of Strategic Housing Market Assessments in order to identify the mix of housing required.	No change

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
			type and size. This evidence may come forward as part of the Neighbourhood Plan process. Berkeley is concerned that Policy CS7 is too limited in relying solely on the evidence contained in the SHMA and will not therefore fully reflect up to date need, rendering the policy ineffective.	Market Assessment or alternative, more up to date, local evidence base documents.		
Mr Derrick Price	CSPS453	Policy CS7	UCA Farnham has published proposals to significantly increase student numbers (~+1000) attending the university in the reasonably near future. But there is already a dearth of student accommodation near the college, so where are these extra numbers going to live? And if they are to be required to commute from neighbouring towns and villages, what will be the impact on the transport infrastructure?		Whilst it is acknowledged that the University is intending to increase student numbers in Farnham, the expansion of the university has not yet been fully quantified. The Council will continue to work closely with the University to consider the future provision of accommodation for students. Policy CS7 supports the provision of accommodation designed to meet the identified needs of students. Policy CS7 supports the provision of accommodation designed to deal with existing student numbers and any future expansion. Any detailed requirements that emerge may be considered through the preparation of the Development Management and Site Allocations DPD.	No change
Alfold Parish Council	CSPS224	9.27	Nowhere is it specified that there is a new supplement to the National Planning Policy Framework, the Planning Policy for Traveller Sites, which became law on the 31st March 2012 and through which the forward policies to provide accommodation for these groups must be framed, revised, updated and implemented within its prescribed criteria. There is a requirement in Annexe 1: Implementation, Clauses 208-219	Insert wording above at the start of 9.27. (refers to the first 4 lines of this paragraph). Amend to include the PRESENT number of plots and pitches and not the number there were in 2006.	The Government's Planning policy for traveller sites is specifically referred to in para. 9.27, but the first sentence could be changed to make this clearer. Reference is made to the 2006 GTAA which was the last assessment of need. The policy is considered to be consistent with guidance in "Planning policy for traveller sites".	First sentence of para. 9.27 amended to read " The Government's 'planning policy for travellers sites' (March 2012) requires Councils...." An updated assessment is currently being completed and may

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			inclusive, in the NPPF that 'material considerations which local planning authorities should take into account from its day of publication'. (This refers to the first 4 lines of this paragraph). Where the paragraph states the number of pitches and plots existing in 2006, this should be the PRESENT number of plots and pitches.			be referred to in a modification to the Core Strategy to provide a factual update.
Alfold Parish Council	CSPS225	9.28	Sequential approach not valid. Criteria must be those within the new PPTS.	The Core Strategy sets out the policy framework/criteria adopted in accordance with the Planning Policy Traveller Sites.	PPTS does not prevent sequential approach.	No change
Alfold Parish Council	CSPS226	9.29	The document should not pre-empt the outcome of the Traveller Accommodation Assessment of Need.	Suggested amendments as follows: The approach to identifying suitable land for new pitches or plots is through the outcome of the Traveller Accommodation Assessment of Need which will produce the evidence to frame the criteria. Consideration would be given to: Intensification of existing sites Suitable extensions to existing sites Use of suitable located previously developed land	Noted. The strategic approach should be set through the Core Strategy. The results of the Accommodation Assessment will not inform the strategic approach to identifying potential sites.	No change
Mr Charles Burton	CSPS18	9.32	History and current experience dictates that there should be no exceptions for allowing a site on Green Belt.	The meaning should be as follows "Under no circumstances should Traveller sites be located on the Green Belt." "Any landowner doing so, should be prosecuted to the fullest extent of the law" "Due consideration should be given however, to persuade a voluntary application for permanent housing within a large town or city. One condition. Strongly advise that the accommodation should be a flat or maisonette with no land attached." This	The policy is considered to be in line with current national policy.	No change

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
				could be achieved without bias, if the planning regulations is tightened to stop/deter any "garden grab" development for any affordable housing group applicant.		
Alfold Parish Council	CSPS227	9.32	Reference to the PPTS should be included.	Suggested amended paragraph as follows: In order to deliver the visions and objectives featured in the PPTS, these policies are aimed at promoting (remainder as stands).	The Government's Planning policy for traveller sites is referred to in para. 9.27. However, the sentence can be amended to make this clearer. The policy is considered to be consistent with guidance in "Planning policy for traveller sites".	Amend first sentence as set out in the response to the comments from Alfold Parish Council on paragraph 9.27 above.
Dunsfold Parish Council	CSPS222	Policy CS8	The Policy states that traveller sites will be provided primarily from intensification or extension of existing sites in priority to consideration of other sites. This approach cannot comply with the requirements of in HMG's "Planning Policy for Traveller Sites" (PPTS) (makes reference to requirements in para 4, 9, 12, 22, 23). The focussing on the intensification and extension of existing sites, and its failure to allude to the overriding requirements of PPTS has a particular danger for WBC of leading it into illegality, given the fact that 70% of Waverley's sites and pitches are already concentrated in the small area of Stovolds Hill which is in PPTS terms is in the middle of nowhere. As they stand those sites taken together do not comply with the principles of the PPTS, and any intensification of any of them pursuant to Policy CS8 without clear reference to the requirements of PPTS will lead the Council into illegality.	Sequential approach does not comply with Planning Policy for traveller sites. Approach would be illegal.	The policy is consistent with PPTS which requires LPAs to set criteria to guide land supply allocations.	No change
Jenny Rickard	CSPS223	Policy CS8	No pitch/plot targets for Travellers are identified in the policy.	Set pitch/plot targets for Travellers in the policy.	Waverley are carrying out a Traveller Accommodation Assessment to assess	No change

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
Surrey Heath Borough Council			<p>The provision of traveller accommodation is considered to be a cross boundary strategic issue and a matter on which the two authorities have a duty to co-operate. There has been cross boundary working between the 2 boroughs in the past in the form of a jointly commissioned GTAA in 2006 and the production of an agreed Surrey wide methodology in 2012. The 2006 GTAA identified a need for 19 pitches and 10 plots for Surrey Heath. For Waverley a requirement of 37 pitches and 2 plots were identified. The results of the GTAA underpinned the targets set in Policy CP7 of Surrey Heath's adopted Core Strategy and Development Management DPD. The lack of specified targets in Waverley's Pre-submission Core Strategy creates uncertainty in relation to this strategic issue and does not allow Surrey Heath to objectively assess the implications of the Waverley traveller policy for the Borough.</p>		<p>future need. This will feed into the proposed Development Management and Site Allocations DPD. Subject to legal agreement, the Council has met its requirement to provide additional pitches and plots recommended from the 2006 West Surrey GTAA.</p>	
Alfold Parish Council	CSPS228	Policy CS8	Needs updating to take account of current law.	<p>Paragraph 3 onwards, suggested amendment as follows: Identifying suitable sites for Gypsies, Travellers and Travelling Showpeople within the Development Management and Site Allocations Development Plan Document (DPD), will take account of the criteria in the PPTS as follows: (i) respect both the views and human rights of both the Gypsies and Travellers themselves and those of the 'nearest settled communities' (ii) a robust evidence to established accommodation needs to inform the preparation of local plans and making planning decisions - whilst continuing to</p>	Core Strategies should not repeat national policy.	No change

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
				<p>(iii) identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of sites against their locally set target.</p> <p>(iv) relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding populations' size and density.</p> <p>(v) criteria should be set to guide land supply allocations where there is identified need. Where there is no identified need criteria-based policies should be included to provide a basis for decisions in case applications nevertheless come forward.</p> <p>(vi) when assessing the suitability of sites in rural or semi-rural settings, local planning authorities should ensure that the scale of such sites does not dominate the nearest settled community.</p> <p>(vii) Local planning authorities should strictly limit new Traveller site development in open countryside that is away from existing settlements or outside areas allocated in the development plan. Local planning authorities should ensure that sites in rural areas respect the scale of, and do not dominate the nearest settled community and avoid placing an undue pressure on the local infrastructure. No changes proposed after existing bullet points.</p>		

Mr Clive Smith	CSPS37	Policy CS8	The difficulty of the task of local planning authorities in meeting the justified accommodation needs of gypsies, travellers and travelling showpeople is appreciated. The sequential approach in Policy CS8 to	Add reference to protection of AONB and AGLV, giving great weight to conserving their landscape and scenic beauty.	Covered by other policies in the Core Strategy	No change
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Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
			<p>identifying sites seems sensible. Where any existing sites fall within the AONB, and similarly within the AGLV, any assessment of their possible extension should, under the NPPF and other policies in the Core Strategy, give great weight to conserving their landscape and scenic beauty. Further, it is understood that gypsy families prefer small sites and they are easier and better managed. The Council or Inspector may wish to include some words in the supporting paragraphs to the policy to cover the above.</p>			
Mr Andrew Triggs South Downs National Park Authority	CSPS387	Policy CS8	<p>We support the policy safeguarding existing authorised sites. However, the policy and supporting text need to be clearer about what level of pitches / plots is required for the plan period. It is not clear if any local need for transit or travelling showpeople is required. It is not clear how many pitches/plots have already been allocated / exist.</p>	<p>Para. 9.26 needs to make clear how many pitches or plots have been provided on the sites identified. Para. 9.27 says that 37 pitches were identified for Gypsies and Travellers in the 2006 GTAA. It does not say how many, if any have been delivered since 2006. It does not say how many, if any, plots are required for Travelling Showpeople.</p> <p>Para. 9.27 says that the new national planning policy for travellers asks Councils to identify a 5 year supply of sites. It does not acknowledge that this policy statement also says that Planning Authorities should "identify a supply of specific, deliverable sites or broad locations of growth, for years 6-10, and where possible for years 11-15. To what extent is this requirement met by the need identified for 2006-2011 + the 3% compound growth rate post 2011(?) This needs to be clarified for the Strategy to be considered sound. Policy CS8 should quantify what are the requirements in Waverley over the plan period to ensure that the needs for</p>	<p>Waverley are carrying out a Traveller Accommodation Assessment to assess future need. This will feed into the proposed Development Management and Site Allocations DPD. Subject to legal agreement, the Council has met its requirement to provide additional pitches and plots recommended from the 2006 West Surrey GTAA.</p>	No change

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
				Gypsies and Traveller accommodation are recognised and properly addressed in the forthcoming Development Management and Site Allocations DPD.		
Mr. Robert Fletcher Ian Baseley Associates	CSPS405	Policy CS8	The policy is not sound because it is not consistent with national policy, because the search sequence for sites contained in the policy is not sufficiently extensive. This envisaged sites being appropriately located in rural areas, the countryside and indeed in the Green Belt where very special circumstances exist and can be demonstrated. The submitted policy stops short of considering the appropriateness of sites for Travelling Showpeople and other Travellers in rural areas and the countryside and therefore is not sound for this reason.	Amend sequential approach to consider sites in countryside	The policy is consistent with PPTS which requires LPAs to set criteria to guide land supply allocations.	No change
Mr Charles Orange Hascombe Parish Council	CSPS449	Policy CS8	Para 9.22 to 9.33 and Policy CS8 needs to be redrafted to comply with and refer to the NPPF supplement on Planning policy for traveller sites.	Refer to Planning Policy for traveller sites in para. 9.22 to 9.33 and Policy CS8	Noted. The policy and text already refer to the Planning Policy for Traveller Sites.	No change

10. Employment and the Economy

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
Mr Charles Burton	CSPS19	10.1	Support. No comments made.	No change to Core Strategy	Noted	No change
UCA	CSPS345	10.1	No reference to creative and cultural industries in spite of statements in NPPF and 10.10 of Core Strategy.		Noted - suggest amendment to paragraph 10.14	Additional sentence at the end of paragraph 10.14 to read: "Waverley is also home to the University of the Creative Arts (UCA). It makes an important contribution not only as a major employer in Farnham, but also through its connection with creative and cultural industries."
Mr Neville Carter: TBRA	CSPS170	10.17	Term 'sui generis' is jargon capable of misinterpretation.	Use plain English	This term is used in Paragraph 10.19 and not 10.17. It is a well- used planning term, however a footnote can be inserted or an entry made in the Glossary of Terms.	Add a footnote or put into Glossary of Planning Terms a definition of 'sui-generis'.
Kennet Properties Ltd.	CSPS433	10.18	Interest in site adj Sewage Works, off Water Lane Farnham. This site must be seen as a critical component of the future growth strategy for the Borough in meeting future employment land needs. ELR makes unrealistic assumptions which consequently underestimate the level of employment land required. No new employment sites being brought forward despite evidence of historical deficit. Critical that additional land is released which will require a review of the designations around		KPL's main criticism of the Employment Land Study and the subsequent update seems to be focused on the B1 plot ratio used. KPL claims that the B1 plot ratio used is only representative of town centre developments. They say it is misleading to suggest that all B1 development would have a 0.75 plot ratio. That is not the case. Aware that B1 plot ratios can differ significantly based on location and exact type of business, that is why the Council's consultants adopted a B1 average plot ratio of 0.75 (the guidance gives a B1	No change

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			<p>Farnham, particularly the Area of Strategic Visual Importance (ASVI). ELR indicates a preference for Policy Managed Growth with an objective of fostering growth in the four towns. It explains how a floorspace figure and a land area have been derived from the job numbers. A critical element of the calculation is assumed plot ratio. The ELR and review use plot ratios for B1a, b and c, B2 and B8 that are different to Roget Tym and Partners 1997 'Plot Ratios for Employment Use' and government guidance and causes overall land requirement to be significantly underestimated. It has been assumed that all B1a, b and c space will be built at the same density as town centre offices. This is unlikely to occur. Market feedback indicates a tight supply position and the consequence is that companies have to look elsewhere, which is damaging for local business growth, inward investment opportunities and sustainability objectives.</p> <p>The 2011 ELR Review assumes the same ratios and the density through B1 development is unrealistically high and the land requirement significantly under-estimated. This is crucial given that in the update report only B1 employment is predicted to grow. Based on the predicted net surplus of B2 and B8 land the ELR anticipates a need for minimum 4.7ha, but this assumes that all surplus B2 and B8 space can be converted to B1 which is unlikely. The update only reports 8.9ha of opportunity land. There is only some 5.3ha of land suitable for employment</p>		<p>plot ratio range of 0.25 – 2.00). If the consultants had used a plot ratio for town centre developments only it would have been higher. Not every single B1 development will have a plot ratio of 0.75 (like not all B2 developments will have one of 0.40) but the consultants believe a plot ratio of 0.75 provides a reasonable average figure to use for the purposes of the study, one that balances out the lower plot ratios of B1b and B1c uses with the higher ones of B1a uses. We therefore believe that the plot ratios used are perfectly appropriate and in line with the established research and guidance. As KPL admits, they are also consistent between the 2009 and 2011 studies and as far as I know have not been challenged before.</p>	

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
			<p>related development in the short term. Much of this is in existing employment areas which is assumed will be redeveloped or intensified. Deeply sceptical about whether this quantum of land can be delivered in the short term. Figures don't take into account any spatial distribution as to where land opportunities exist and the extent to which these match with market demand. Only one opportunity site has come forward since the initial ELR for employment use, the other three for non-employment purposes which could imply general viability problems. Both reports carry forward assumptions that mean the requirement for B2 and B8 land is significantly underestimated. Believe the predicted employment growth is partly as a result of extrapolating forward trends from over the previous 10 years whereby much employment potential is already being forced out of the Borough due to lack of land and premises.</p>			
Mrs Zofia Lovell: South Farnham Residents Association	CSPS117	10.24	ELR 2009 states that in short term intensification and improvement of existing employment land should be promoted. No mention of long term use of Dunsfold Park or its alternative potential use for housing.	Explain role of Dunsfold Park.	Paragraph 10.45 states that Dunsfold Park "represents an opportunity for employment development, intensification and expansion of activity to support the economic needs of the Borough. Dunsfold Park is not the Council's preferred location for accommodating housing growth." Policy CS10 states that Waverley supports the continuation and expansion of employment activity at Dunsfold Park, subject to certain matters being addressed in a detailed masterplan, and this is currently being produced by the Council. See also the	No change

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
					Council's response to the representations on Chapter 6 and Policy CS2 in particular.	
Mrs Anne Cooper: The Farnham Theatre Association	CSPS193	10.30	Tourism hardly features in Core Strategy. Statement that Waverley has no large scale tourist attractions demonstrates lack of vision in developing tourism. Potential to draw visitors to urban areas west of the Borough from developments in Hampshire. Farnham has no theatre but there is local need to develop a community performing arts centre.	Sustainability appraisal has not been carried out with regard to tourism and benefits. Recommend alternative wording relating to need to better promote tourism in town centres and development of opportunities as a result of increased housing in NE Hampshire. Add point to CS9 to 'encourage and promote projects and development which will increase tourism in the Borough'.	The high quality of the built and rural environment in Waverley makes it attractive to visitors. Policies in this Core Strategy recognise the importance of protecting Waverley's environmental assets so that they remain attractive to visitors. One of the Objectives of the Core Strategy is: "To protect the countryside for its intrinsic character and beauty and as a recreational asset, including visitor facilities, and, where appropriate, promote its continued recreational use." Point 6 of policy CS9 specifically refers to making provision for accommodation for visitors to the Borough both in terms of business trips and tourism related visits.	No change
Mrs Zofia Lovell: South Farnham Residents Association	CSPS118	10.32	CS acknowledges surplus employment land as potential housing land, but neglects to accept that Dunsfold Park will support housing need in Waverley. The site is capable of sustaining both employment and 1500 homes.		Dunsfold Park is not the Council's preferred location for accommodating housing growth. Policy CS10 states that Waverley supports the continuation and expansion of employment activity at Dunsfold Park, subject to certain matters being addressed in a detailed masterplan, and this is currently being produced by the Council. See also the Council's responses to representations on Chapters 5 and 6 where Dunsfold Park is mentioned.	No change
Kennet Properties Ltd.	CSPS435	10.39	ELR has a number of flawed assumptions which means that the required level of employment land during the lifetime of the CS is significantly underestimated. i) Deeply unrealistic to assume B1	Further update on ELR is required based on sound assumptions. i) More typical plot ratios are 0.4. Following this ratio would entail the Borough needing to provide for a much larger supply of employment land, not	KPL's main criticism of the Employment Land Study and the subsequent update seems to be focused on the B1 plot ratio used. KPL claims that the B1 plot ratio used is only representative of town centre developments. They say it	No change

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
			<p>space will be built at the same density as in town centres. It dramatically over estimates the density at which office accommodation is likely to be built out at (and consequently significantly underestimates the required amount of land.</p> <p>li) The predicted job creation levels during the Core Strategy are extrapolated forward from a period where the supply of employment land has been constrained and companies are struggling to find suitable sites in the Borough. This has the effect of dampening down the predicted employment growth.</p> <p>lii) Despite the ELR reporting exceptionally low vacancy rates in Farnham it claims to have identified 5.27ha of opportunity land. This figure appears to be reliant upon intensification and redevelopment of sites of existing employment land rather than providing additional sites. This appears to contradict the reported low vacancy levels; provides no new space for existing businesses on these sites to relocate to (i.e. they have to continue operating and expanding on existing sites); does not recognise that to secure inward investment will require comprehensive environmental enhancement of many these sites which intensification would not facilitate; and is not consistent with past evidence which demonstrates that such employment sites tend to be brought forward for non-employment uses/higher value uses in the majority of cases.</p>	<p>the 4.5 hectares as anticipated by the ELR.</p> <p>ii) Whilst the job creation figures have been identified using a recognised methodology there has been no allowance made for the fact that over recent years there has been an acknowledged shortage in the supply of employment land for business to expand to or invest in. ELR does not appear to have undertaken a rigorous assessment of all employment land opportunities. Land that Kennet Properties Limited has promoted throughout the Core Strategy process has not been assessed within the ELR. Core Strategy should have a much higher employment floorspace target and a significantly reduced reliance upon redeveloping and intensifying existing employment sites to achieve this target. To achieve this, further strategic employment allocation(s) are required within the Core Strategy.</p>	<p>is misleading to suggest that all B1 development would have a 0.75 plot ratio. That is not the case. Aware that B1 plot ratios can differ significantly based on location and exact type of business, that is why the Council's consultants adopted a B1 average plot ratio of 0.75 (the guidance gives a B1 plot ratio range of 0.25 – 2.00). If the consultants had used a plot ratio for town centre developments only it would have been higher. Not every single B1 development will have a plot ratio of 0.75 (like not all B2 developments will have one of 0.40) but the consultants believe a plot ratio of 0.75 provides a reasonable average figure to use for the purposes of the study, one that balances out the lower plot ratios of B1b and B1c uses with the higher ones of B1a uses. The findings of the Employment Land Review update 2011 are that the need for additional employment floorspace can be met through the use of the short term and, if necessary, long term opportunity land.</p>	

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Mr Geoff Reeve: Wadham & Isherwood	CSPS100	Policy CS9	Lack of provision for any additional employment land other than Dunsfold Airfield which suffers from very poor road access. Such a location would be of no interest to companies currently based in Farnham. Concern that this strategy will dictate policy to 2028. Without proper provision of additional employment land opportunities the area will stagnate. Currently		The findings of the Employment Land Review indicate that future needs can be met through the short term and, if necessary, long term opportunity land.	No change
Mr Michael Smyth	CSPS171	Policy CS9	Sustainability appraisal has not been conducted to a standard to meet the requirements of s19(5). Core Strategy too vague or insufficiently advanced to enable proper SA to take place. Inadequate community involvement. Insufficient regard to NPPF. CS is a strategy to prevent development. Failure to meet housing needs has led to distortion for business, leading to pressure to convert employment land to residential. Inability of staff to live locally forcing long commutes, restrictions on development of business premises, hostility towards and change or development. Growing businesses generally need to move from Waverley.	Core Strategy needs to be rewritten to take account of comments.	See response to the comments made in relation to Chapters 5 and 6 (particularly policies CS1 and CS2).	No change
Mr Lionel Cozens- Smith	CSPS198	Policy CS9	In addition to the "possible allocation of additional industrial and commercial sites, in the Development Management and Site AllocationsDPD", sites in rural areas in Countryside Beyond the Green Belt OR GREEN BELT may be required. This possibility should be allowed for in Policy CS9.		Not agreed. It is considered that future needs for employment accommodation can be met without the need to use undeveloped land in the Green Belt.	No change
Mrs Catherine Weller	CSPS199	Policy CS9	In addition to the "possible allocation of additional industrial and commercial sites, in the Development Management and Site Allocations DPD", sites in rural		Not agreed. It is considered that future needs for employment accommodation can be met without the need to use undeveloped land in	No change

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			areas in Countryside Beyond the Green Belt OR GREEN BELT may be required. This possibility should be allowed for in Policy CS9.		the Green Belt.	
Vail Williams LLP	CSPS229	Policy CS9	Concern that only identification of additional employment land is at Dunsfold Aerodrome which will not satisfy the needs in western part of Borough and Farnham in particular. Land for employment purposes must be identified in Farnham. Waverley has not worked with the business community and previous submissions haven't been taken into account in taking document to 2028. Seems that Waverley is relying on proviso of employment in adjoining boroughs which will not satisfy need and is wrong.	To be in line with NPPF emphasis on growth needs to be reflected in the Core Strategy. There is a substantial site to the north of Water Lane that could accommodate new employment development. (See also CSPS435 Kennet Properties Ltd.)	It is not agreed that the views of business have not been taken into account. During the preparation of the original Employment Land Review (ELR) there was a business survey and workshops for business representatives. In addition there have been opportunities for business to engage with the Core Strategy process. For example there was a dedicated business event organised by the Waverley Business Forum earlier this year. It is anticipated that the future employment needs can be met through use of the identified short and long term opportunity land.	No change
Mr Andrew Macleod: Farnham Society	CSPS276	Policy CS9	Role of UCA Farnham Campus is not mentioned. Not only is the University a substantial employer in its own right, but it offers important employment spin offs in creative arts industries which ought to be recognised and provided for in this Core Strategy. UCA has its own strategic plan to 2027 and it is important to include any proposals for expansion of the Farnham campus in the Core Strategy. No reference to tourism in spite of the many attractions.	<ol style="list-style-type: none"> 1. Recognition of the importance of the University within the plan and inclusion of a policy to support the establishment of cultural industries in Farnham linked to the University e.g. by identifying an area for workshops. 2. Recognition that tourism has a part to play in the Borough's economy and supportive policies should be included within the Core Strategy. 	Regarding the UCA agree to addition to paragraph 10.14. Regarding tourism, this is already picked up by point 6 in Policy CS9.	Additional sentence at the end of paragraph 10.14 to read: "Waverley is also home to the University of the Creative Arts (UCA). It makes an important contribution not only as a major employer in Farnham, but also through its connection with creative and cultural industries."
West Cranleigh Nurseries /	CSPS376	Policy CS9	Support with Modifications. In order to promote and maintain the viability of existing settlements, consideration		It is considered that the Council's future employment needs can be met without the need to specifically	No change

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Knowle Park			should be given to the expansion and diversification of employment sites to reduce out-commuting from settlements and integrate other development. Consideration should be given to multi-use development on the edge or adjacent to existing settlements in tandem with Greenfield housing development required to meet housing need in order to maintain the balance of housing and employment provision.		identify new employment sites on the edge of settlements.	
Bloor Homes	CSPS416	Policy CS9	Relates to Weyburn Works, Elstead. Site identified in SHLAA for housing. Support the provision for alternative uses for surplus employment sites. CS9 is in accordance with national planning policy. Works has been redundant since 2008, there is a considerable supply of local employment premises. This site is not required to meet employment need and should be identified for alternative residential uses in the Core Strategy and Site Allocations document.	Should be given Major Development Site Status in the Core Strategy.	See Council's responses to the representations from Bloor Homes on Chapters 5 and 6 (policies CS1 and CS2).	No change
Kennet Properties Ltd.	CSPS434	Policy CS9	The overall aims of Policy CS9 are welcomed. However, although objective to target employment to four main settlements provides spatial element, there is no further detail about the broad shares of employment sites to be accommodated in each of the settlements. No means to ascertain whether CS is realistic, achievable and capable of being monitored. Overall level of employment development is inadequate (see CSPS435). Acknowledge that Dunsfold Park has a role to play in delivering employment land, but it is in an entirely unsustainable location and serves a different land need to businesses	Policy CS9 needs to be founded upon a robust employment floorspace target (or range) and then clearly set out in broad terms how this development is to be spread across the Borough. Farnham must be the main focus for new employment land if overall strategy of sustainable development is to be progressed. Additional sites on the edge of Farnham should be identified if employment requirements are to be satisfied. Critical that strategic allocations within Farnham are included, guidance as to how it is to be distributed across Waverley, evidence that there are sites to accommodate growth. Allocation should be in addition	See other comments in response to the representations from Kennet Properties LTD. Considered that future employment requirements can be met through use of short and, if necessary, long term opportunity land without the need to allocate new employment sites on the edge of the settlement.	No change

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			attracted to main settlements, particularly Farnham. Policy enables an over reliance on employment space in Dunsfold which would harm economic development in the Borough. CS10 does not set an upper cap on development there and seems to be the only new employment land to be made available in the borough. Supporting text provides indicative figure as to quantum of development, policy does not. Despite ELR reporting exceptionally low vacancy rates in Farnham, it does not identify any additional employment sites from those identified in the 2002 Local Plan. Instead, all potential opportunity sites appear to be land where intensification could take place. ELR 2011 update appears to demonstrate that where existing employment sites are developed, they tend to be for other uses.	to potential re-use or intensification of existing sites.		
Cranleigh Parish Council	CSPS143	10.41	See CSPS153		Noted.	No change
Mrs Zofia Lovell: South Farnham Residents Association	CSPS119	10.45	Previous paragraphs (Para 10.41 to 10.45) give the location, historic significance and current usage of Dunsfold Park, but neglect to mention the Planning Application History for housing on this site. Given the burdens and restrictions placed on the rest of the Borough why Dunsfold Park is not worthy of being "a preferred location for accommodating housing growth".	Local people want Waverley to include Dunsfold Park as a preferred location for accommodating housing growth. It is afterall a Brownfield Site.	See the Council's response to this respondent's comments on Chapters 5 and 6 (particularly policies CS1 and CS2).	No change
Mr Geoffrey Sweatman	CSPS16	Policy CS10	As written plan is sound. Concerns about intensified traffic around Dunsfold Park.		Noted	No change

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
Ms Sarah West	CSPS99	Policy CS10	Welcomes introduction of CS10.	None	Comments noted.	No change
Mrs. Irene Marshall	CSPS148	Policy CS10	Insufficient information about transport accessibility: A281 and B2133 are very congested at peak times and will become worse due to new housing development at Broadbridge Heath (2,500 houses). Likely that there will be further expansion of haulage activities at Dunsfold Park. Effective traffic calming measures will be needed in Alfold and the northern West Sussex villages of Alfold Bars and Loxwood and HGVs need to be discouraged or banned from using the B2133. Lack of recommendations about transport and housing: many people employed at Dunsfold Park cannot afford to live in the locality, and have to commute to the site. Will be made worse with the expansion of employment at Dunsfold Park. Affordable housing therefore needed near Dunsfold Park.	These issues should be addressed in the detailed masterplan.	Matters relating to access and transportation will be addressed as part of the Masterplan/Development Brief that will be produced to deliver Policy CS10. Regarding the issue of housing at Dunsfold Park, see the Council's responses to representations on Chapters 5 and 6 (particularly policies CS1 and CS2).	
Cranleigh Parish Council	CSPS153	Policy CS10	Support policy, but development should be restricted to the site shown in fig 10.1. New industries should be clean. Oppose any significant increase in aviation at Dunsfold. Any expansion of aviation on the site should be rigorously assessed for its impact on Cranleigh and the surrounding area. Vigorously oppose the development of an airport at Dunsfold Park. The site should continue to be assessed as a site for housing development as appropriate to support industrial requirements.	Added protections for Cranleigh are required, and more attention to the impact of the proposed development on the village infrastructure, including transport.	Noted. These matters will largely be dealt with by the proposed Masterplan/Development Brief for Dunsfold Park. Regarding housing at Dunsfold Park, see the Council's responses to the representations on Chapters 5 and 6 (particularly policies CS1 and CS2).	No change
Mr Martin Loxton: Loxwood	CSPS197	Policy CS10	See CSPS148	See CSPS148		

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Parish Council						
Ms Jenny Hartley: Loxwood Parish Council	CSPS234	Policy CS10	See CSPS148	See CSPS148		
Dunsfold Parish Council	CSPS246	Policy CS10	<p>The area of Dunsfold Aerodrome in Fig 10.1 wrongly includes other areas for countryside land which have been acquired by the current owner over the last 10 years. These pieces of land have a different planning history and status from the aerodrome land. Greater precision is required in defining the site and the different planning status of different parts of the land in the Map. Map includes land within Countryside beyond the Green Belt and therefore protected under CS2. Agricultural land recently acquired should not be included on the map. LDF must be clear and accurate in relation to description of status for Dunsfold Park. Not unreasonable to say in Core Strategy that the masterplan should not be agreed to unless and until it had been subject to public consultation. Combination of statements in 10.48 that 86% of land is previously developed and policy CS10 location of development should have focus on previously developed land is misleading and could create serious problems in controlling inappropriate development. Core Strategy should provide more detail about the history and policy coverage of the site. Any expansion of employment development at Dunsfold Park should be conditional on the site</p>		The Masterplan/Development Brief will provide clarity in terms of what is or isn't 'brownfield' land as well as identifying broadly where new development should go. Issues relating to access, traffic and transportation will also be considered by the Masterplan/Development Brief.	No change to Core Strategy.

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			achieving direct connection to the A281 given the unsustainable condition of the current rural exit routes.			
Mr Andrew Macleod: Farnham Society	CSPS285	Policy CS10	It has failed to explicitly to say why it does not consider Dunsfold Park suitable for housing and employment. No mention of planning appeal. Given the difficulties of providing development opportunities within the Borough, the importance of using brownfield sites (the airfield) before green fields and the need to minimize development within the TBH protection area, fuller coverage would have surely been appropriate. Would be more appropriate to see employment growth here as part of a new settlement which would support a range of services and offer the possibility of local jobs and at the same time reducing pressure on Cranleigh and Farnham..	That policy CS10 be amended to make it clear that employment growth at Dunsfold park should be considered in the context of a new settlement, that the last sentence of paragraph 10.45 be removed and that Dunsfold Park be considered as a site for a new sustainable settlement of a sufficient scale to support a large range of services of the sort set out in the proposals dismissed on appeal in 2009.	See the Council's response to this respondent's comments on Chapters 5 and 6 (particularly policies CS1 and CS2).	No change
Mrs Kathy Smyth: Guildford and Waverley Friends of the Earth	CSPS290	Policy CS10	Council has failed to address the future of the biggest brownfield site in the Borough and policy is naïve, ill-informed and out of date particularly in relation to aviation. Refer to Taylor report.	In the case of CS10 changes are impossible.	See the Council's response to this respondent's comments on Chapters 5 and 6 (particularly policies CS1 and CS2).	No change
Mr Colin Hall: CPRE SURREY	CSPS301	Policy CS10	Policy provides that nearly all of the airfield should be available for employment related development as previously developed land. Most of the site is open countryside which should be protected for its intrinsic character and beauty, no presumption that whole curtilage should be developed. Development of former hangar space is in principle acceptable.	Should be greater recognition of the openness and rural nature of the undeveloped part of the site which should not be compromised. Additional safeguards should be incorporated into CS10 to ensure the rural character of that part of the site on a sustainable basis in accordance with the NPPF.	Additional employment development at Dunsfold park will be subject to the Masterplan/Development Brief. This will consider issues such as the broad distribution of development and how this might impact on character.	No change

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
Farnham Town Council	CSPS308	Policy CS10	NPPF states that development should be on brownfield sites where possible. Without any evidence WBC has decided that Dunsfold Park should be used for employment use only. No analysis of implications of combining housing and employment opportunities on the site. Access to employment from the outskirts of Farnham will result in increased use of the car, as there is no public transport available. Little scope for expansion of employment facilities in Farnham due to constraints. Employment intensification at Dunsfold Park will increase traffic activity. Unrealistic to expect a site of this scale to be covered in industrial and office space, illogical not to put housing on site, including affordable.	Policy CS10 should be improved by better reference to the evidence base. There has to be a thorough analysis of all uses of the land at Dunsfold Park, including improved access to the A281.	Matters such as access and transport will be addressed through the proposed Masterplan/Development Brief. See also the Council's response to comments from this respondent in relation to Chapters 5 and 6 (particularly policies CS1 and CS2).	No change
Jackie Hutton: Dockenfield Parish Council	CSPS398	Policy CS10	Rural villages need to have a positive policy to redevelop business use from redundant buildings and refuse 100% housing applications to aid future vibrancy. Without evidence it appears some have deliberately sought not to develop Dunsfold intelligently. Large potential site with little landscape restriction. Increasing jobs without housing is not sustainable. Only challenge is to positively plan to modify access roads.	[a] Ensure policy for redevelopment includes c. 50% footprint into business use. [b] Propose mixed development of the site with houses for employees of the area to create better sustainability of business.	See the Council's response to comments on Chapters 5 and 6 (particularly policies CS1 and CS2) relating to Dunsfold Park.	No change
Mr Charles Orange: Hascombe Parish Council	CSPS450	Policy CS10	Para 10.48 - 10.50 should be amended to show that not all land is previously developed and that some present uses were approved as temporary. Inaccurate to state in 10.51 that Dunsfold Park is the Borough's biggest employer as the towns must employ more people, should say it is the largest employment site under the ownership	CS10 should be amended to reflect the green field nature of much of the airfield, and the area of the map should be carefully checked to address the point made to Waverley BC by Dunsfold Parish Council that it includes land purchased by Dunsfold Park after 2001. Inaccurate to state in 10.51 that Dunsfold Park is the Borough's biggest	The reference to Dunsfold Park being the largest employer (see paragraph 10.43) is a reference to when it was occupied by British Aerospace. Other matters will be addressed through the proposed Masterplan/Development Brief.	No change

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			of a single landlord.	employer as the towns must employ more people, should say it is the largest employment site under the ownership of a single landlord.		
Dunsfold Park Ltd	CSPS469	Policy CS10	The second bullet point of policy CS10 should be omitted. There is no justification for an employment policy to be used as a control policy in respect of other land or for another use. If directly related and relevant to employment use, control of aviation/aircraft movements is included and covered within the second bullet point of the policy. Suggest an appropriate amendment to the text.	The draft policy should be revised as follows: The Council supports the continuation and expansion of employment activity at Dunsfold Park, as identified on the Plan at Figure 1, subject to the following matters being addressed in a detailed masterplan: <ul style="list-style-type: none"> - appropriate uses including the development of renewable technologies; - [delete bullet point relating to aircraft movement]; - mitigating environmental impacts of development including noise and disturbance to adjoining communities; - the need for access and transport accessibility to the site to be improved in view of its rural location; - the location of development with particular focus on areas of previously developed land. 	Not agreed. The policy is about continued employment activity on the site. Aviation activity is part of the business/employment activity.	No change

11. Town Centres and Shopping

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implication for the Core Strategy
Mrs Celia Sanders	CSPS85	11.1	Policy relies on out of date 2008 Town Centre Retail Study. Consider growth of internet shopping.	Updated evidence of town centre requirements.	A revised Town Centre study has been commissioned to update the Core Strategy.	The findings of the revised Town Centre Study will be fed into the Core Strategy as appropriate.
The Farnham Theatre Association	CSPS194	11.1	Does not include reference to need to carry out needs and impact studies, and the sequential approach applied to all town centre uses. Waverley did not carry out need and impact assessment for replacement of Redgrave theatre in Farnham. CS11 should be consistent with CS4.	PPS EC4 has not been applied regarding arts and culture in town centres. Prefer original wording of previous document relating to Government's policies for main town centre uses, and recommended approach for considering new town centre development. Policy should begin 'Waverley will continue to foster a healthy mixed retail, leisure, cultural and service economy....'	Comment refers to Planning Policy Statement 4 which has been abolished. Paragraph 11.3 does refer to the NPPF requirement that needs for town centre uses are met in full. The policy does encourage improvements in the town centres to help them act as the focus for a range of activities and specifically refers to cultural uses. The Vision also supports a diverse range of uses to appeal to a wide range of people. As such, it is considered to be consistent with CS4 and the NPPF.	To ensure that the range of town centre uses is understood and is not ambiguous, paragraph 11.3 should quote the list of uses from the NPPF in full, to read: 'A range of suitable sites should be allocated to meet the scale and type of retail, leisure, commercial, office, tourism, cultural and leisure needs are met.....'
Mr Richard Sanders	CSPS126	11.14	2008 Town Centre Retail Study is out of date. Consider growth of internet shopping.	Waverley Borough Council should not be embarking on largest commercial development it has ever undertaken against a background of significantly changing retail patterns. Reference to Brightwells development.	A revised Town Centre study has been commissioned to update the Core Strategy. Farnham has limited ability to provide sites for development to allow it to expand what it offers to customers and visitors, and as such needs to take the opportunity that the Brightwells site offers in order to remain vital and viable and able to compete with neighbouring shopping centres.	The findings of the revised Town Centre Study will be fed into the Core Strategy as appropriate.
Mr Richard Sanders	CSPS160	11.21	Quotes Farnham Town Council's concerns about East Street (Brightwells) renewed application for development.	Review the development scheme for Brightwells following a robust impact and infrastructure assessment and	The proposals for the East Street development (Brightwells) have been approved and the provisions of the	No change to Core Strategy.

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implication for the Core Strategy
			Concern that the proposed development will affect the success and cohesion of the town and it's character.	amended to meet the definition of sustainability given in the NPPF.	NPPF taken into account.	
Paul Cowper	CSPS159	11.26	Public houses in urban areas are as vital as to those in the rural areas as they contribute to the liveliness and vitality of the area.	Request detailed information to be included about the retention of public houses and opposition to conversion or redevelopment plus requirements to show loss of viability.	This paragraph refers specifically to Godalming Town Centre and refers to the restaurants, public houses and bars in the town which contribute to the evening economy. This would therefore not be the place in the Plan to include the statement suggested. Other parts of the Plan such as Chapter 8 do mention the value of community facilities, which include public houses, and the Visions and Policies CS11, CS 12 and CS13 all refer to supporting them and resisting the loss of valued services. These references make the Council's intention to support and protect such facilities when appropriate, clear. The mechanisms by which this may be achieved could be incorporated into the Development Management document.	No change to Core Strategy.
Cranleigh Parish Council	CSPS144	11.35	Support statements about shopping provision in Cranleigh.		Noted	No change to Core Strategy.
Cranleigh Parish Council	CSPS145	11.38	Suggest a factual change in relation to past actions of Cranleigh Initiative.	Paragraph to read: 'Arising from the Healthcheck The Parish Council part funded the Cranleigh Initiative which was active until 2012 in promoting the vitality and vibrancy of the village centre. The Initiative organised events throughout the year to attract not only local residents but also those from surrounding villages.'	Agreed.	Amendment to paragraph to read: Arising from the Healthcheck, the Parish Council part funded the Cranleigh Initiative which was active until 2012 in promoting the vitality and vibrancy of the village centre. The Initiative organised events throughout

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						the year to attract not only local residents but also those from surrounding villages.
Rushmoor Borough Council	CSPS79	Policy CS11	The Core Strategy is not sound as it is not effective; it does not provide certainty about the scale of expansion proposed in Farnham town centre and it is not therefore possible to gauge the consequent impact on Aldershot and Farnborough town centres. Not based on effective joint working on cross boundary strategic priorities; Not sound as it is not consistent with national policy; it fails to provide a clear strategic policy to deliver retail development as required by paragraph 156 of the NPPF.	A limit on the scale of expansion proposed in Farnham town centre to reflect the anticipated growth in retail expenditure in the primary catchment area over the plan period. Anything above this could have a negative impact on the vitality and viability of Aldershot and Farnborough town centres.	An updated version of the Town Centre Study is being prepared. From that will come the estimated floorspace figures relating to the town centres, which could be incorporated into the Core Strategy. The existing 2008 study states that all of Waverley's centres are constrained in terms of growth due to various restrictive policies such as conservation areas, historic buildings and other physical features. The area has never been one which has been subject to pressure for retail development from large scale multiples, and because of the character and constraints of each of the centres and their environment, this is likely to continue to be the case. At this stage is not possible to be more certain about the scale of expansion in Farnham, other than that which is already permitted in the Brightwells development.	Potential amendment to the Core Strategy once revised floorspace requirements are calculated in revised Town Centre Review.
Farnham Branch Labour Party	CSPS89	Policy CS11	The Town Centre Retail Study which forms a basis of the strategy is seriously flawed. For example, the growth rate for comparison goods expenditure assumed in the study for the next 5 - 10 years and used to develop the core strategy are now seem to be unrealistically high.	Policy CS11 needs to be reevaluated using realistic retail growth forecasts.	A revised Town Centre Study has been commissioned.	The findings of the revised Town Centre Study will be fed into the Core Strategy as appropriate.
Farnham Town Council	CSPS309	Policy CS11	Changing retail situation is not reflected in Waverley's future plans for the town. Several large sites, which are, or	Reconsider East Street (Brightwells) in light of changes to retail provision. Balance of current scheme unviable.	A revised Town Centre study has been commissioned to update the Core Strategy.	The findings of the revised Town Centre Study will be fed into

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implication for the Core Strategy
			will be, ready for re-development in the near future such as Police Station and the Woolmead; both town centre sites which should be mentioned in the Core Strategy for consideration in the Neighbourhood Plan. Opportunity to improve several areas of the town and concern that this could leave the town unbalanced in its shopping and other town centre provisions.	New assessment needed, taking into account long-term trends and cross border provision to enable Farnham to complement and not compete with neighbouring town centres.		the Core Strategy as appropriate.
UCA	CSPS346	Policy CS11	Pleased that the Council has recognised the needs of those who study in the borough, and the contribution they make to Waverley's town centre.	None	Noted	No change to Core Strategy
UCA	CSPS347	Policy CS11	Policy should recognise the needs and the role of the creative and cultural industries, in reference to para 21 of NPPF, 'plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries....' and paragraph 10.10 of Core Strategy.	Once the necessary changes have been made, this part of the document will be sound as it will be in accordance with central government guidance.	Policy CS11 does refer to encouraging appropriate development in the town centres and specifically refers to them acting as a focus for a range of activities including culture.	No change to Core Strategy
South Downs National Park Authority	CSPS383	Policy CS11	Limited concern about the policy, but undersells the role and potential of Haslemere, without giving clear reasons. Policy should refer to people visiting as well as living, working and studying.	Opportunity to identify potential improvements to Haslemere's offer to serve visitors to the National Park, recognising its ability to serve as a 'gateway'. It could also better meet the needs of communities in the far north of the National Park, some of who travel through Haslemere on a regular basis. This could reduce the need to make journeys and reduce journey length. There should be reference to how sustainable modes of transport can be provided or enhanced between Haslemere and its surrounding rural communities, including in the National Park, recognising that contributions from developers may help to address	Paragraph 11.12 refers in general terms to all of the town centres having features which attract visitors as well as residents. The first part of the Vision is generic, and seeks to support a diverse range of uses to enhance the town centres, including facilities for leisure. Paragraph 10.33 also refers to the need to support businesses that support economic growth and specifically refers generally to hotels and restaurants across the borough. The Spatial Portrait refers to Haslemere's position as a 'gateway to the National Park.	No change to Core Strategy

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implication for the Core Strategy
				this issue.		
F & C Reit	CSPS464	Policy CS11	Policy does not outline formally all mechanisms available by which development can be promoted and therefore may not be fully effective in securing the vitality and viability of the town. Does not take advantage of opportunities available to encourage development within the Town Centre through Site Allocations DPD, Development / Planning Briefs and any Neighbourhood Plans. The plan is therefore not fully effectively at aiding development. By formally referring a Site Allocations DPD, Development / Planning Briefs and Neighbourhood Plans the Council are formalising their ability to identify key sites in an Allocation DPD and expand on what will or will not be permitted whilst also encouraging other stakeholders to bring forward new sites for development in agreement with the Local Authority through Planning Briefs and Neighbourhood Plans. It is demonstrated above that in order to be full effective, Policy CS11 Town Centres should be amended to refer to Site Allocations DPD, Planning Briefs and Neighbourhood Plans.	Amended wording to policy CS11 to include: "...or damage the townscape character. The Council will encourage the promotion of specific town centre sites by promoting them through the Site Allocations DPD(s) and by producing planning briefs as Supplementary Planning Documents to give further encouragement to the development of particular sites and give additional guidance on the appropriate form development should take. Applications for retail, leisure,"	The policy , text and Visions as worded, demonstrate the Council's support in principle for the development of town centre sites.	No change to Core Strategy.
Paul Cowper	CSPS156	Vision for the Local Centres	The wording of Vision needs to added to, to ensure that as the strategy says "Maintaining the vitality and viability of the centre,"	Suggest the following wording be added. The Council strongly supports retaining public houses in rural areas, particularly where the availability of other community premises is limited. Public houses raise the quality of community life and the environment in rural areas and help promote thriving, inclusive and sustainable communities. Applications for change of use or	As stated in the Vision, the Council wishes to support all shops, services and other small economic uses (including post offices, petrol stations, village halls and public houses), but can only do so if these are viable and if it can be proved that they are so. As also stated it cannot prevent the closure if they are proved to be uneconomic. Using the suggested wording would	No change to Core Strategy.

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implication for the Core Strategy
				redevelopment will be resisted, unless convincing evidence can be provided to show that the public house is not economically viable and is no longer required to meet the needs of the local community.	unbalance the support for other uses in communities. As stated in response to other comments from CAMRA, more detailed tests for the retention of public houses will be incorporated in the Development Management Document, rather than the more Strategic Core Strategy.	
Paul Cowper	CSPS158	11.44	Paragraph mentions where Public Houses have been taken over by the local community, but before this happens the council should use the CAMRA Viability and Marketing test to see if the pub viable and can still be run as a pub by the present owners or as a community facility.	Suggests detailed wording relating to tests of viability and marketing, type of evidence required by the Council for assessment of viability.	The Council always asks for information relating to viability, marketing and advertising when considering applications for the redevelopment or loss of public houses, regardless of location. The Core Strategy does state: "..... it is necessary to make sure that all reasonable efforts are made to retain a valued retail use in the villages in order to help support the rural economy" and it considers that this, and other references to supporting valued community uses elsewhere in the plan, make it's intention to support them when appropriate, clear. The mechanisms by which this may be achieved, such as the CAMRA Viability and Marketing Test, could be incorporated into the more detailed Development Management document. This would be the place where tests for assessing the community value of pubs and other facilities will need to be set out, as the Core Strategy sets out more strategic policies, such as CS11, CS12 and CS13 and the Visions accompanying them, as well as CS4: Infrastructure and Community Facilities.	No change to the Core Strategy.

12. Leisure, Recreation and Culture

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
Lamron Estates	CSPS72	12.6	This paragraph does not accurately quote NPPF guidance.	A cross-reference to NPPF para 74 should be introduced for accuracy/clarity.	Paragraph 12.6 was intended to give a flavour of paragraph 74 of the NPPF without quoting it directly. It omits to refer to the last bullet point which indicates that the existing space, sport and recreational buildings and land including playing fields should not be built on unless the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss. For completeness, reference to this part of the paragraph could be included.	Amendment to paragraph 12.6 to read:requirements; the loss would be replaced by equivalent or better provision in terms of quality and quantity in a suitable location; or or that the development is for alternative sports and recreation provision, the needs for which clearly outweigh the loss.
Mr. R. Sanders	CSPS161	12.6	CS14 and NPPF state that assessment is required to demonstrate that the existing use of a facility is no longer viable if a leisure building is going to change its use or be lost. WBC has not made public any such objective evidence based assessment on Redgrave Theatre, Farnham. PPS EC4 should be applied for assessment of needs. Reference is made to sports and recreational facilities keeping pace with increases in population, but reference to new community cultural facilities is omitted. Policy CS11 should be consistent with Policy CS4 in the development of new facilities to meet community needs.	An appropriate objective, evidence based assessment of the local demand for theatre should be carried out and put in the public domain.	PPS4 has been abolished. It is not for the Core Strategy to address the issue of whether specific uses should be retained or not. The Policy sets the framework for the future consideration of leisure, recreation and cultural applications.	No change to Core Strategy.
The Theatres Trust	CSPS57	Policy CS14	Support Policy CS14 where cultural facilities will be safeguarded from development unless they are no longer	None	Comments noted	No change to Core Strategy.

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
			required (by the Council) despite the statement in para.12.17 that the Borough Council will actively support the arts.			
The Farnham Theatre Association	CSPS195	Policy CS14	Should be noted at 12.17 that there is no dedicated theatre building in the Borough. There is to be a Borough-wide audit of cultural assets, but no indication of any need assessment to be carried out or to remedy any inadequacies if discovered. PPS EC4 should be applied here for assessment of needs for proactive planning for the future for arts and cultural buildings although protection from development is promised for existing facilities. No reference to new community cultural facilities to keep pace with population increases.	Confusion Core Strategy between cultural buildings which are arts-related and those which are seen as community hubs. As cultural buildings can fit both categories, the policies CS14 and CS4 should at least be consistent and reflect the growing needs of the communities in which they are situated. Not consistent with PPS4. We have found the Waverley Guidance information quite confusing and may have erred in being over critical of the Leisure Recreation and Culture Policy CS 14 which has some very good points and is a great improvement on the previous submission, as it does give protection for cultural buildings.	It is not considered appropriate to indicate which facilities the Borough doesn't have in the Core Strategy. PPS4 no longer exists as PPSs were abolished with the introduction of the NPPF and can no longer be applied. The policy is considered to be sound.	No change to Core Strategy.

13. Rural Environment

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
Mr Clive Smith	CSPS33	13.12	The position as in September 2012 is that of the 34 AONBs nationally, Natural England has shortlisted the Surrey Hills AONB and Suffolk Coast and Heaths AONB for possible formal AONB boundary reviews. They are considering the existing evidence base for the reviews and resources and are in discussion with the Surrey Hills AONB Unit and the Planning Departments of the constituent planning authorities before making their final decision.		Noted	None
Mr Clive Smith	CSPS34	13.16	It is currently envisaged that if and when the Surrey Hills AONB boundary review has been completed, the County AGLV designation will lapse. This will simplify landscape designations within Surrey and accord with the Government's approach to the AGLV when it agreed to retain the AGLV in the last version of the Surrey Structure Plan.		Noted	None
Lamron Estates	CSPS73	13.17	It has not been demonstrated that there is an overriding need for these additional designations to overlay the protection that already exists under other Core Strategy policies and the NPPF for the countryside lying beyond the settlement boundary. [Also see comments on paragraph 13.18 and Policy CS15]		Policy for the Farnham/Aldershot Strategic Gap seeks to protect the Gap from inappropriate development through the application of Core Strategy Policy CS1 and Local Plan Policy C2, as well as promoting enhancement of landscape and conservation of wildlife sites; and promoting improved public footpaths and bridleways. It has played an important role in preventing coalescence of Farnham and Aldershot. The ASVI designation is considered to play an important role in protecting the character of existing settlements,	None.

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
					by preventing coalescence of settlements or protecting open land which penetrates urban areas and acting as 'green lung'. The Council is committed to reviewing these designations within its Site Allocations and Development Management DPD.	
Lamron Estates	CSPS74	13.18	Notwithstanding our in principle objections to Policy CS15 & paragraph 13.17, Strategic Gaps and ASVI are being proposed as strategic level designations, so any need for them must be proven in the Core Strategy rather than deferred until a later DPD, as is proposed.		Policy for the Farnham/Aldershot Strategic Gap seeks to protect the Gap from inappropriate development through the application of Core Strategy Policy CS1 and Local Plan Policy C2, as well as promoting enhancement of landscape and conservation of wildlife sites; and promoting improved public footpaths and bridleways. It has played an important role in preventing coalescence of Farnham and Aldershot. The ASVI designation is considered to play an important role in protecting the character of existing settlements, by preventing coalescence of settlements or protecting open land which penetrates urban areas and acting as 'green lung'. The Council is committed to reviewing these designations within its Site Allocations and Development Management DPD. As the replacement of the Local Plan is being carried out in two stages, namely (i) Core Strategy (ii) Development Management and Site Allocations, it is considered reasonable to review these designations at the second stage.	None
Mr Clive Smith	CSPS35	Policy CS15	Strongly supported and is considered to be well worded as far as the AONB and AGLV are concerned. It generally accords with the adopted Core Strategies in the two other Surrey Hills		Noted	None

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
			<p>AONB constituent planning authorities, namely Mole Valley, adjoining Waverley, and Tandridge. The Surrey Hills Board is anxious that a consistent approach to the AONB and the relationship of the AGLV is maintained in the Core Strategies for Surrey Hills authorities. This proposed wording does the. Reference in the policy to the Surrey Hills Management Plan is welcomed and has the advantage of tying the Management Plan into the development plan. In view of the likely impending AONB boundary review of the Surrey Hills AONB by Natural England, a light touch review of the Management Plan is currently envisaged.</p>			
<p>Mr Martin Harrop CROUDACE STRATEGIC</p>	<p>CSPS51</p>	<p>Policy CS15</p>	<p>(i) Object to the policy, because in relation to the Area of Great Landscape Value, the policy as drafted seeks to give the same weight to the AGLV as the AONB. The AONB is a Nationally recognised planning policy designation, the AGLV is not and should not be afforded the same status.</p> <p>(ii) Any review of the boundaries of the Surrey Hills AONB and AGLV should have been undertaken in a timely manner so that its conclusions could have been included in the draft Core Strategy, and not deferred for future action.</p> <p>(iii) As a locally derived landscape designation the relevance of the AGLV to the Core Strategy is limited. It is well established through National planning policies that Local Authorities should avoid the 'layering' of locally based landscape designations that have no</p>	<p>The draft policy should be revised to clarify that the AGLV does not have the same status as the AONB. In addition, it is regrettable that the Council have not undertaken its review of the AONB boundary in time for its findings to be incorporated into the Core Strategy. The draft Core Strategy should include a specific time-line for the review of the AONB boundary.</p>	<p>The approach to retain the AGLV designation until such time as the AONB boundary is reviewed represents a consistent approach with other local authorities affected by the AGLV designation, including Tandridge and Mole Valley who have adopted Core Strategy policies which retain the AGLV designation. Pending this it is considered that Policy CS15 contains an appropriate level of protection for these respective designations. The NPPF states that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes.</p>	<p>None.</p>

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
			National provenance.			
Hambledon Parish Council	CSPS42	Policy CS15	Although the Green Belt is a matter for central government legislation, given the pressures that are being mounted for its reduction should not this policy express the view that its integrity should be maintained?		The Council consider that there is sufficient protection for Green Belt land within the Core Strategy, which is in accordance with the protection it is afforded under national policy. Specific reference to the protection of the Green Belt is made in Policy CS1.	None
Lamron Estates	CSPS75	Policy CS15	The Strategic Gap and ASVI designations are unnecessary and should be deleted. [Also see paragraphs 13.17/13.18]		Policy for the Farnham/Aldershot Strategic Gap seeks to protect the Gap from inappropriate development through the application of Core Strategy Policy CS1 and Local Plan Policy C2, as well as promoting enhancement of landscape and conservation of wildlife sites; and promoting improved public footpaths and bridleways. It has played an important role in preventing coalescence of Farnham and Aldershot. The ASVI designation is considered to play an important role in protecting the character of existing settlements, by preventing coalescence of settlements or protecting open land which penetrates urban areas and acting as 'green lung'. The Council is committed to reviewing these designations within its Site Allocations and Development Management DPD.	None
Ms Louise Piper Rushmoor Borough Council	CSPS80	Policy CS15	The policy identified sound reasons for retaining this Farnham/Aldershot Strategic Gap designation. However, it notes that these local designations will be subject to a review as part of the preparation of a subsequent document. Concerned about the option in this policy to review the designation in a subsequent document. The Core	(i) Identification of the broad location of the greenfield site allocation around Farnham on the key diagram; (ii) Deletion of the following text from Policy CP15: "In the longer term, through the Development Management and Site Allocations DPD, the Council will review this local landscape designation and, if necessary, the	These matters are also addressed in the Council's response to the representation from Rushmoor Borough Council on Policy CS2. Policy for the Farnham/Aldershot Strategic Gap seeks to protect the Gap from inappropriate development through the application of Core Strategy Policy CS1 and Local Plan Policy C2, as well as	None

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
			<p>Strategy should be setting out with certainty the key strategic policy framework for the future of Waverley Borough, to enable the impacts of proposed development over the plan period to be assessed and mitigated. The application of Policies CP2 and CP15 together, as worded, potentially leaves land between Aldershot and Farnham, which is currently strategic gap, vulnerable to review as part of a subsequent document that will identify greenfield housing allocations. Given the scale of proposed development in this location, this risk is exacerbated by the failure to show on the key diagram the broad location of the proposed greenfield allocation around Farnham. The Core Strategy is not sound as it is not effective; it fails to show clearly the implications of proposed development on greenfield land around Farnham and the consequent impact on the strategic gap between Aldershot and Farnham - it is not based on effective joint working on cross-boundary issues.</p>	<p>boundary."</p>	<p>promoting enhancement of landscape and conservation of wildlife sites; and promoting improved public footpaths and bridleways. It has played an important role in preventing coalescence of Farnham and Aldershot. The Council is committed to reviewing these designations within its Site Allocations and Development Management DPD. In the meantime it is the Council's intention to save Local Plan Policy C2 until the Development Management and Site Allocations DPD is adopted.</p>	
<p>Mark Mathews Thames Water Plc</p>	<p>CSPS93</p>	<p>Policy CS15</p>	<p>Objects to the retention of the Area of Strategic Visual Importance (ASVI) designation and request that the Farnham Sewage Treatment Works (STW) and the adjoining road network are removed from the ASVI designation for the following reasons:</p> <p>(i) The STW relates well to the built up area and the settlement pattern of Farnham.</p> <p>(ii) Due to the built up nature of the STW, which is visible from surrounding areas, it cannot be regarded as an important part of the rural area or an</p>	<p>Delete the ASVI designation or delete Farnham STW from the designation.</p>	<p>The ASVI designation is considered to play an important role in protecting the character of existing settlements, by preventing coalescence of settlements or protecting open land which penetrates urban areas and acting as 'green lung'. The Council is committed to reviewing this designation within its Site Allocations and Development Management DPD.</p>	<p>None</p>

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
			<p>integral part of the countryside under policy.</p> <p>(iii) Not part of a landscape which fulfils a visual role in preventing the coalescence of Farnham and Aldershot. Neither does it form part of open land or a green lung which contributes materially to the character of Farnham</p>			
Mr Chris Marks Sturt Farm Ltd	CSPS205	Policy CS15	<p>(i) The Strategy is too rigid in its interpretation of the National Planning Policy Framework (NPPF) and as a result its own Policy CS15 which is unduly restrictive, with the position being that there shall be no development on land within the AONB and AGLV.</p> <p>(ii) a review of both designations is acknowledged to be long overdue. It is evident that some parts of the designated areas have little value and their development will not have a detrimental impact.</p> <p>(iii) the consultants study failed to consider urban fringe areas where one might expect changes to be greatest and which the South East Plan drew attention to as areas for special consideration.</p> <p>(iv) A clear spatial strategy for the main towns and a revision of Policy CS15 to enable a realistic evaluation of land currently 'protected' but in sustainable locations should enable the release of sites in the most favourable places which on balance would cause the least harm in environmental terms over a range of measures. The sustainability appraisal of the Core Strategy Pre Submission Draft fails to test the allocations of housing at the main centres against environmental criteria</p>	<p>Policy CS15 needs clear criteria to be workable and to meet the aspirations of the NPPF. For example the Tandridge Core Strategy (Policy CSP20 - Areas of Outstanding Natural Beauty) including the following text: "support suitable located sustainable development necessary to facilitate the environmental, economic and social well being of the AONBs and their communities;" In addition makes reference to the South East Plan, which is considered to have established a sound basis for a criteria lead approach in its Policy on the AONB, which respected the need for development whilst seeking to protect the areas from harm.</p>	<p>The AGLV designation recognises the landscape value of countryside outside the AONB. The NPPF advises allocating land of the least environmental value. The Council considers that it can meet its housing requirements without the need to use AGLV land. Policy CS1, states that development should generally be directed to land within settlements, albeit that there will also be the need to make selected greenfield releases. The approach to retain the AGLV designation until such time as the AONB boundary is reviewed represents a consistent approach with other local authorities affected by the AGLV designation, including Tandridge and Mole Valley who have adopted Core Strategy policies which retain the AGLV designation. Pending this it is considered that Policy CS15 contains an appropriate level of protection for these respective designations.</p>	None

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
			that would enable comparisons to be made between alternative locations. (v) Further delay in allocations pending an Allocations Development Plan Document is not acceptable			
Monkhill Ltd	CSPS209	Policy CS15	<p>(i) The Strategy is too rigid in its interpretation of the National Planning Policy Framework (NPPF) and as a result its own Policy CS15 which is unduly restrictive, with the position being that there shall be no development on land within the AONB and AGLV.</p> <p>(ii) a review of both designations is acknowledged to be long overdue. It is evident that some parts of the designated areas have little value and their development will not have a detrimental impact.</p> <p>(iii) the consultants study failed to consider urban fringe areas where one might expect changes to be greatest and which the South East Plan drew attention to as areas for special consideration.</p> <p>(iv) A clear spatial strategy for the main towns and a revision of Policy CS15 to enable a realistic evaluation of land currently 'protected' but in sustainable locations should enable the release of sites in the most favourable places which on balance would cause the least harm in environmental terms over a range of measures. The sustainability appraisal of the Core Strategy Pre Submission Draft fails to test the allocations of housing at the main centres against environmental criteria that would enable comparisons to be made between alternative locations.</p> <p>(v) Further delay in allocations pending</p>	<p>Policy CS15 needs clear criteria to be workable and to meet the aspirations of the NPPF. For example the Tandridge Core Strategy (Policy CSP20 - Areas of Outstanding Natural Beauty) including the following text: "support suitable located sustainable development necessary to facilitate the environmental, economic and social well being of the AONBs and their communities;" In addition make reference to the South East Plan, which is considered to have established a sound basis for a criteria lead approach in its Policy on the AONB, which respected the need for development whilst seeking to protect the areas from harm.</p>	<p>The AGLV designation recognises the landscape value of countryside outside the AONB. The NPPF advises allocating land of the least environmental value. The Council considers that it can meet its housing requirements without the need to use AGLV land. Policy CS1, states that development should generally be directed to land within settlements, albeit that there will also be the need to make selected greenfield release. The approach to retain the AGLV designation until such time as the AONB boundary is reviewed represents a consistent approach with other local authorities affected by the AGLV designation, including Tandridge and Mole Valley who have adopted Core Strategy policies which retain the AGLV designation. Pending this it is considered that Policy CS15 contains an appropriate level of protection for these respective designations.</p>	None

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
			an Allocations Development Plan Document is not acceptable			
Central Land Holdings Ltd	CSPS260	Policy CS15	Object to the policy on the grounds that it is unsound as it is not consistent with national policy. In relation to the Farnham/Aldershot strategic gap we consider that this imposes an unnecessary blanket policy on restricting sustainable development within the designated gap. Support of a review of this local landscape designation and consider that its boundary should be modified to provide a more flexible approach to sustainable housing development on appropriate sites.	Reference made to Land to the East of Badshot Lea (SHLAA ID 27) which has been included within the Waverley Borough Council SHLAA, 1 April 2012. The residential development of this site would not erode the integrity of the strategic gap designation and therefore the boundary should be modified to exclude the site; Land to the East of Badshot Lea (SHLAA ID 27).	Policy for the Farnham/Aldershot Strategic Gap seeks to protect the Gap from inappropriate development through the application of Core Strategy Policy CS1 and Local Plan Policy C2, as well as promoting enhancement of landscape and conservation of wildlife sites; and promoting improved public footpaths and bridleways. It has played an important role in preventing coalescence of Farnham and Aldershot. With regard to the site referred to (Land East of Badshot Lea - Site ID 27). The site was considered within the Strategic Housing Land Availability Assessment (1 April 2012). However, It was not taken forward to be included in a list of greenfield sites for further consideration (Appendix 7). This is because it is located within a Mineral Safeguarding Area, identified within the Surrey Minerals Plan (July 2011) (as explained in para 7.5 of the SHLAA report).	None
Mr Alex Sciarretta Sentinel Housing Association	CSPS274	Policy CS15	(i) It is not considered appropriate to seek to uphold the same level of protection to a local landscape designation. If the areas of AGLV throughout the Borough were worthy of a national designation they would have been designated as such. The Council appears to seek to employ the AGLV areas as a buffer zone to the AONB. (ii) Seems to assume that all development within these areas will automatically have a detrimental effect	To avoid excluding suitable sites from development simply on the basis that they may be designated as AGLV, it is suggested that part of Policy CS15 which relates to The Area of Great Landscape Value is deleted, as follows: "The Area of Great Landscape Value The same principles will apply in the Area of Great Landscape Value (AGLV) which will be retained for its own sake, until such time as there has been a review of the Surrey Hills AONB Boundary "Reference made to a suggested	The approach to retain the AGLV designation until such time as the AONB boundary is reviewed represents a consistent approach with other local authorities affected by the AGLV designation, including Tandridge and Mole Valley who have adopted Core Strategy policies which retain the AGLV designation. The preferred strategy for the Core Strategy for the Core Strategy is to direct development to land with a lesser environmental quality in line with the NPPF.	None

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
			<p>on the landscape. It is perfectly possible to design and implement a scheme which does not have a detrimental impact upon a sensitive landscape.</p> <p>(iii) Challenge the justification of retaining AGLVs on the Chris Burnett Associates report undertaken in 2007, this is out of data and therefore is not justified by a robust evidence based approach.</p>	<p>strategic site: Land at Coxbridge Farm, Farnham. It is our view that the site is suitable for consideration as a strategic site which should be allocated through the Core Strategy given its potential to make a significant contribution to housing and SANG delivery over the plan period to 2028. The most recent SHLAA report (base date April 2012) has identified the site of the Land at Coxbridge Farm as a Greenfield site identified for further consideration.</p>		
Farnham Town Council	CSPS310	Policy CS15	<p>Makes reference to the preservation of the following strategic designations around Farnham, including Countryside Beyond the Green Belt (CGGB), AONB and AGLV, Areas of Strategic Visual Importance (ASVI) and the Farnham/Aldershot strategic gap. The Strategic Gap provides movement corridors for all forms of wildlife, as well as bridleways and walkways and has succeeded in preventing the junction of Farnham and Aldershot, a situation desired by neither town. The Core Strategy should better identify and protect the Farnham/Aldershot strategic gap.</p>	<p>The Core Strategy in this area appears realistic, but the soundness in the area of the Strategic Gap and local landscape designations will await the publication of the Management and Site Allocations DPD.</p>	<p>The approach to the Strategic Gap is considered appropriate and proportionate. The Council is committed to reviewing the Strategic Gap designation within its Site Allocations and Development Management DPD. In the meantime it is the Council's intention to save Local Plan Policy C2 until the Development Management and Site Allocations DPD is adopted.</p>	None
Mr Andrew Triggs South Downs National Park Authority	CSPS386	Policy CS15	<p>This chapter fails to recognise the particular constraints of having a National Park along part of the Borough's southern boundary. The policy seems to concentrate entirely on pressures within Waverley and does not identify this important cross-boundary issue. The English National Parks and the Broads Circular (published in 2010 by Defra and cross-referenced by the NPPF) identifies that the achievement of National Purposes relies on a</p>	<p>It is vital that this chapter recognises that what happens in the Borough of Waverley could impact on the National Park. There must be specific reference in the policy and supporting text to the setting provided by the National Park and that development in close proximity to the National Park boundary must respect this landscape setting. This should relate to the particular statutory purposes of National Parks including conserving and</p>	<p>The Council recognises the need to make reference to the National Park designation.</p>	<p>Additional paragraph to be added after para 13.7: "Parts of the Borough are adjacent to the South Downs National Park and therefore it is necessary to ensure that development does not have an adverse impact on its</p>

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
			"collective renewed focus". Furthermore, the 1949 National Park Act places a statutory duty on "relevant authorities" to have regard to Park purposes when coming to decisions or carrying out their activities relating to or affecting land within a National Park.	enhancing the natural beauty, wildlife and cultural heritage of the Park and be in accordance with the ambitions of the emerging South Downs Management Plan. It is vital that development proposals adjacent to the South Downs National Park enhance and do not detract from the visual quality and essential characteristics of the National Park and in particular do not adversely impact views out of or into the Park by virtue of their location or design. The Strategy should also give recognition of the scope to collect contributions to fund green infrastructure projects, including where these cross the National Park boundary.		setting." Additional wording to be added at end of the policy as follows: "South Downs National Park Where development affects the setting of the South Downs National Park it will be necessary to ensure that there is no adverse impact on the natural beauty, wildlife and cultural heritage of the park."
Taylor Wimpey Strategic Land	CSPS389	Policy CS15	(i) Local landscape designations should only be maintained where it can be shown that criteria based planning policies cannot provide the necessary protection. There is no attempt by WBC to demonstrate this. (ii) Talk of delay until an SPD review is completely inappropriate. (iii) AGLVs are hard to defend but at least they are found cross border; the concept of ASVIs is without basis. Object to the inclusion of the ASVI designation. In summary the approach to the plethora of landscape designations, in particular the "Areas of Strategic Visual Importance" are not backed by an evidence base, not shown to be necessary to aid positive outcomes of the plan and not in line with the national policy aim to bring clarity and simplicity to the planning system. The CS, insofar as landscape designations is		The NPPF states that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes. The ASVI designation is considered to play an important role in protecting the character of existing settlements, by preventing coalescence of settlements or protecting open land which penetrates urban areas and acting as 'green lung'. The Council is committed to reviewing these designations within its Site Allocations and Development Management DPD.As the replacement of the Local Plan is being carried out in two stages, namely (i) Core Strategy (ii) Development Management and Site Allocations, it is considered reasonable to review these designations at the second stage.	None

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			concerned, also fails the tests of soundness.			
Dockenfield Parish Council	CSPS402	Policy CS15	Even when within landscape designations, the rural villages cannot currently refuse over-applications within/on the edge of the settlements. Whilst a small annual increment has occurred over decades the cumulative pressure for desirable market housing seriously threatens the future rural village scene and surrounding environment by excluding small affordable homes for young people as the principle need.	A positive incremental development figure would provide guidance and enable an "enough is enough for the moment" policy to be handled positively and be a material consideration.	See responses to Chapter 6 - Amount and Location of Housing.	None
Mr Norman Gillan Mono Consultants Ltd	CSPS427	Policy CS15	We would reiterate our earlier comments in relation to the superfluous nature of the Strategic Gap policy. It should be removed. Previous comments refer to a number of factors which weigh against the continued presence of a 'strategic gap' policy, these include: (i) the publication of the South East Plan (and the accompanying rationale in the EIP Panel Report) (ii) the publication of the NPPF (iii) the deletion of similar policies in neighbouring Core Strategies (e.g. Surrey Heath) (iv) The ongoing and increasing demand for housing land in the area.	The Strategic Gap designation should be removed.	Policy for the Farnham/Aldershot Strategic Gap seeks to protect the Gap from inappropriate development through the application of Local Plan Policy C2, as well as promoting enhancement of landscape and conservation of wildlife sites; and promoting improved public footpaths and bridleways. It has played an important role in preventing coalescence of Farnham and Aldershot. The Council is committed to reviewing these designations within its Site Allocations and Development Management DPD.	None
Kennet Properties Ltd.	CSPS436	Policy CS15	(i) The policy seeks to retain a number of local landscape designations without first confirming that an objectively identified level of development can be accommodated without their review. Whilst it acknowledges the review of these designations in the longer term, it starts from a position that they will be	Policy CS15 should be reworded to confirm that in order to bring forward sufficient employment land in Farnham during the lifetime of the Core Strategy, the land off Water Lane will be de-designated from the ASVI and allocated as a strategic employment land.	See response to comments made on Policy CS9: Sustainable Employment Development.	None

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
			<p>protected, maintained and enhanced.</p> <p>(ii) Cannot not see how an adequate supply of employment land, meeting the actual future needs of employment space in Waverley and, specifically Farnham, can be met without a thorough review of such designations to accommodate additional development. Such a review would focus on releasing land that would facilitate the most sustainable form of development on the least environmentally sensitive land.</p> <p>(iii) Makes reference to the lack of available employment land surrounding Farnham and expresses concern regarding the delay in allocating sites. Identifies that much of the land around Farnham has policy constraints limiting the potential for new sites to come forward. Consequently it is highly unlikely that the site allocations DPD will be able to bring forward the required land for employment without reviewing some of these restrictive policy designations, which the Core Strategy does not appear to facilitate.</p> <p>(iv) Request that a strategic employment allocation is made in the Farnham area and identify land off Water Lane as suitable site. The site is considered to make a limited contribution to the ASVI for the following reasons:</p> <ul style="list-style-type: none"> - land relates well to the built up area and the settlement pattern of Farnham due to the built up nature of the sewage treatment works, it cannot be regarded as an important part of the rural area or an integral part of the countryside. - does not form part of a landscape 			

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			<p>which fulfils a visual role in preventing coalescence of Farnham and Aldershot - does not form part of an area of open land or a green lung which contributes materially to the character of Farnham, or surrounding countryside.</p> <p>Consequently we feel that policy CS15 needs to be revised such that this land is removed from the ASVI designation and allocated as a strategic employment site.</p>			

14. Townscape, Heritage and Design

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
Mr Martin Small English Heritage	CSPS220	14.1	English Heritage welcomes and supports the recognition of: the Borough's rich historic environment; the contribution of the Borough's heritage assets to the character of the Borough; the importance of continued protection through informed management., the references to Conservation Area Appraisals and Management Plans and the explanation of the link between the two.		Noted.	None.
Dr. Flatman	CSPS39	Policy CS16	In relation specifically to Section 14 ('Townscape, Heritage and Design') of the Pre-Submission Core Strategy, the Heritage Conservation Team is extremely supportive of the vision for the heritage of Waverley outlined in this document, which we consider to be a comprehensive overview and statement of intent in this regard. Refer to the importance of developing detailed policies on heritage in the proposed Development Management and Site Allocations DPD. Particular reference to archaeological sites.		Noted. Comments will be useful for Development Management DPD.	None.
Lamron Estates	CSPS76	Policy CS16	Unsound : Paragraph 1 is contrary to NPPF guidance [para 58] in that it will stifle innovation in design.		Disagree that the Core Strategy is unsound on this point. Paragraph 58 of the NPPF clearly explains that policies "should aim to ensure that developments... respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation..." Point 1 of CS16 builds on this guidance by requiring that new development be of the highest standard that responds	None.

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
					to the distinctive local character of the area. It does not therefore follow that this would stifle innovative design, indeed innovative and high quality design should respond to the character of the area as a basic urban design principles. Policy C16 conforms with the NPPF and in particular paragraph 58. Disagree it is unsound on this point.	
Mr Andrew Whitaker Home Builders Federation Ltd	CSPS189	Policy CS16	Good design' is subjective. Although tools such as 'building for life 12' can be used as a tool to discuss various elements of design a flexible and realistic approach is required when the Council is considering planning applications. By requiring new development to be 'of the highest standard of design' yet providing now clear guidance of the assessment criteria used to judge design quality, we are concerned that the Council will use the wording of this policy to delay or prevent proposals that have been objected to on purely subjective grounds.The policy does not, furthermore, take into account the cost of meeting 'the highest standards of design' and its potential effect on viability of development. Given the above comments we suggest that the words 'the highest standard of' should be deleted and replaced with the word 'reasonable and appropriate.'		Agree that design is subjective and it cannot be defined by a series of 'tick boxes'. However, the future Development Management DPD will elaborate on the criteria that constitutes high quality design building based on established urban design principles. In addition applications that require a Design and Access Statement would continue to be useful tool for applicants justifying how their development positively responds to its environment. Para 57 of the NPPF clearly states that "it is important to plan positively for the achievement of high quality and inclusive design for all development...". The Council considers that CS16 conforms to this approach. The HBF also argue that there is a cost implication of achieving the 'highest standard of design'. Again this is a matter that can be argued both ways. High quality design need not mean additional cost if embedded early within the development process. In addition evidence suggests that high quality design can mean greater marketability and potentially increased revenue (see CABE's "The Value of Urban Design" 2001). However, bad design often brings a wider cost	Policy CS16, Point 1 amended to reflect NPPF para 57 - delete 'highest standard' add 'high quality and inclusive'.

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
Farnham Town Council	CSPS311	Policy CS16	Part 14 seeks to safeguard the attractive and historic townscape of Farnham, in accordance with NPPF. Section 2, and the design features that are an integral part of local heritage sites, in NPPF Section 7. Farnham already had design statements and guidelines (para 14.12), and a neighbourhood plan is in preparation. A Conservation Area Management Plan is in operation to manage heritage assets at 14.6. The Core Strategy should better reflect the NPPF in relation to design issues and recognise the contribution to delivery which will be achieved by the Farnham Neighbourhood Plan.	The Core Strategy in this area appears realistic, but in practice heritage assets require maintenance and occasional renovation, for which little or no funding is available. The soundness of the Strategy in the area of the future work needed by detailed documentation (para 14.11) must await the publication of the Development Management and Site Allocations DPD.	Noted.	None.

environmentally, socially and economically.

15. Biodiversity and Geological Conservation

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
Heather Twizell Natural England	CSPS352	15.14	Core Strategy is sound. Would like to see specific policy on Green Infrastructure. The HRA refers to need for new development to provide GI or connections to it in reaching conclusion of no significant adverse effect on Wealden Heaths SPA.	Add policy on Green Infrastructure. Could be done through Supplementary Planning Document.	Green Infrastructure is referenced in Policies CS4, CS14 and CS17, therefore it is not considered necessary to add a standalone policy. Green infrastructure will be considered as part of the Site Allocations and Development Management DPD.	No change
Cranleigh Parish Council	CSPS146	15.20	Supports the inclusion of Cranleigh Ancient Woodlands as a Biodiversity Opportunity Area and insists that any developments should not damage these woodlands and they should be preserved at all costs. Believe that all local woodland should be preserved, as this is a very strong feature of the area.		Ancient woodland and other woodland is protected by the policy.	No change
Katie Newton Environment Agency	CSPS233	15.22	Paragraph 15.22 of the document refers to the vision for Local Nature Partnerships (LNP), for your information the Surrey LNP was given formal LNP status by Defra in July 2012.		Paragraph 15.22 will be updated to acknowledge this change.	Additional wording at end of 15.22 to say that in July 2012 the Surrey Local Nature Partnership was given formal status by DEFRA.
Mr Tony Chadwick Woodland Trust	CSPS95	Policy CS17	Comend and praise the council for it's inclusion, recognition and protection of ancient woodland and that this is in keeping with the NPPF, we feel that it should be extended to also include Ancient and veteran trees. There protection is referred to within the NPPF and strongly contend that ancient and veteran trees should be afforded the same protection as ancient woodland within the hierarchy.	The relevant section of Policy CS17 could be amended to read as follows: "(iii) Sites of Nature Conservation Importance (SNCI), Local Nature Reserves (LNR), Local Geological Sites and other Ancient Woodland, Ancient and Veteran Trees not identified within (ii) above (Local)"	Agreed	Amend policy as recommended: "(iii) Sites of Nature Conservation Importance (SNCI), Local Nature Reserves (LNR), Local Geological Sites and other Ancient Woodland, Ancient and Veteran Trees not identified within (ii) above (Local)"

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Katie Newton Environment Agency	CSPS238	Policy CS17	Note the document's determination to protect not only internationally, nationally and locally designated environments, but also those that are not significant enough to obtain such a status. It also makes special reference to the importance of river and canal wildlife corridors in the area.		Noted	No change
Katie Newton Environment Agency	CSPS244	Policy CS17	Welcome the inclusion of suggested additions, including reference to the Water Framework Directive (WFD) and the need for undeveloped buffer zones to watercourses. This makes the policy more robust and consistent with national policy.		Noted	No change
Farnham Town Council	CSPS312	Policy CS17	The Core Strategy is not legally compliant with the European Directive for the following reasons: i) directive states that "development must not take place within an area of 5km from a designated SPA if an alternative outside the preclusion zone is available". The brownfield site at Dunsfold is an alternative which has not been included as a site for housing development. ii) The eastern car park does not fulfill the current policy requirements for a car park to a SANG. Therefore it cannot provide SANG according to the European Directive. iii) It is felt that the current mitigation policy fails to meet the requirements of the Waddenzee judgement.	Waverley cannot plan future development on the 'hope' of providing additional SANG, or relying on adjoining authorities to share their SANG. Consider it unlikely that a developer will be able to provide their own SANG, due to high land prices.	This is incorrect – there is nothing in the Habitats Directive or the Conservation of Habitats and Species Regulations which includes the above quote, or anything like it. Natural England have not raised any concerns over the adequacy of Farnham Park as a SANG. This representation relates to Policy CS18 and the supporting text, rather than Policy CS17 as submitted.	No change

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Mr Cain: The Homes & Communities Agency	CSPS323	Policy CS17	Consider that the plan is not positively prepared as it does not enable flexibility with regard to improvements which could be achieved through expertise and analysis. Need to reflect that certain sites may be capable of accommodating improved biodiversity informed by robust landscape and ecology expertise and analysis.	Propose the addition of " without appropriate mitigation" is added to the end of the third sentence of the first paragraph. We propose the addition of : "The Council will seek, where appropriate, to maintain existing trees, woodland and hedgerows within the Borough"	The first proposed change refers to the wording in the Core Strategy Revised Preferred Options and Draft Policies (February 2012). This has been dealt with and the policy wording now states that if the adverse impacts of proposed development are considered unavoidable then permission may still be granted if the Council considers that the adverse impacts are appropriately mitigated. The second proposed change is accepted.	Amend penultimate para. of Policy CS17 to read: "The Council will seek, where appropriate, to maintain existing trees, woodland and hedgerows within the Borough"
Heather Twizell Natural England	CSPS355	Policy CS17	In Natural England's opinion the document is sound. Take the opportunity to commend the Authority once again on this comprehensive policy. Pleased to note that the approach towards the Wealden Heaths SPA set out here and in the supporting text is consistent with that taken by East Hampshire District Council as this is a cross-boundary site.		Noted	No change
West Cranleigh Nurseries / Knowle Park	CSPS377	Policy CS17	The policy fails to recognise the potential for biodiversity/ecosystem service loss off-setting, referred to in the Natural England White Paper - The Natural Choice: Securing the Value of Nature (2011). There are a number of DEFRA pilot projects taking place across England.	The policy should be rewritten to include off-setting techniques. Suggest insertion of "compensated for" at the end of point b.	The projects referred to are still at a pilot stage and therefore it is not considered appropriate to refer to them. Regarding the proposed addition to Point 11, this has been discussed with Natural England who consider that the reference to avoidance or mitigation is sufficient.	No change

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
Mr Jerry Hyman	CSPS428	Policy CS17	<p>Fails to comply with Planning & Compulsory Purchase Act 2004:</p> <p>Fails to comply with Habitats Directive: Article 8 (Reg.9) requires Council to have regard to Directive in conduct of its functions. Inspector in 2006 Core Strategy Examination criticised pre-determination of the spatial strategy and led to withdrawal. Where is the Waddensee evidence? Housing numbers, targeting of Farnham for bulk of development show Council's failure to consider Habitats constraints until the spatial strategy was "done and dusted". Habitat Regulations Assessment was produced in July 2012 after Draft Core Strategy was decided and was not individually consulted upon. Lack of SANG to support Core Strategy. Evidence required to justify the Core Strategy does not exist. SA is therefore incomplete. A Habitats Article 6(3) Appropriate Assessment of the CS has not been conducted and published. Farnham Park SANG is ineffective, Avoidance Strategy fails to meet Waddensee criteria of convincing objective scientific evidence. Based on car park on Hale Road without direction connection. 5km zone of influence is incorrect, SEP Assessor recommended 7km. 400m exclusion zone should be increased. SEP Assessor recommended 1km. No evidence to support 8ha/1000 SANG standard and no objective evidence to show that the SANG and SAMM strategies are effective. HRA gives no numbers for bird populations. Disagrees with HRA conclusion that Wealden Heaths bird numbers are not affected by human proximity. Surrey</p>	None suggested. Requires complete rewrite of Core Strategy	<p>The principles underlying the Thames Basin Heaths Delivery Framework have already been subject to considerable technical scrutiny, have been endorsed by Natural England and formed part of the evidence base for the South East Plan that was taken into account when it passed Examination in Public in 2007 and was subsequently adopted by the Secretary of State in 2009.</p> <p>The Council have addressed the South East Plan issue and option of whether some housing could be redistributed. The final version of the Sustainability Appraisal and Habitat Regulations Assessment have been published for consultation but preparation of the Plan has been informed by the earlier work and draft assessments.</p>	No change

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			<p>Heath Core Strategy EiP did not have Waddenzee evidence and policy was amended post-examination to require developers to provide Waddenzee evidence. Policy NRM6 of South East Plan requires housing development to be directed to areas of the Borough to avoid effect on SPAs, ie. Outside 7kms on SPA, such as Bramley, Wonersh, Shamley Green, Dunsfold and Cranleigh. Council have prejudiced Core Strategy process by failing to evidence decision to target Habitats affected areas rather than take lawful option of a new settlement at Dunsfold Park. Refers to Manydown (Basingstoke) decision. The housing target should be reduced to ensure AONB and Green Belt designations are respected and neighbouring borough unaffected by restrictions of Habitats legislation should make up for Waverley's underprovision. Other Inspectors have ignored Waddenzee judgment. Displacement effects are unknown. Duty to Co-operate - have not considered concept of addressing Habitats issues and sharing housing allocations accordingly. Fails to comply with SEA. Fails to comply with EIA Directive. Fails to comply with Biodiversity/Habitats issues in NPPF and Circular 06/2005.</p>			

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Mrs Alison Giacomelli RSPB	CSPS431	Policy CS17	<p>Seriously concerned that the Core Strategy does not provide appropriate safeguards to protect the integrity of the Wealden Heaths (Phases 1 & 2) from the effects of increased recreational pressure and other 'urban effects' associated with new housing development. Considered to fail the tests of soundness and inconsistent with the Habitat Regulations, for the following reasons: (i) Not Justified - Policy CS17 does not represent an appropriate response to the substantial evidence base of the significant detrimental effects of urbanisation on the three Annex I heathland birds for which the Wealden Heaths (Phases 1 & 2) are internationally designated. Neither is the policy the most appropriate strategy when considered against that of other heathland SPAs in southern England, including the Thames Basin Heaths and Dorset Heathlands SPAs.</p> <p>ii) Not Effective - The policy sets out an approach to new housing development within 400m of the Wealden Heaths (Phases 1 & 2) SPA which is unlikely to be deliverable due to conflicts with the approach taken elsewhere that it is not possible to avoid/mitigate the urban impacts of new housing at this distance from the heaths.</p> <p>iii) Not Legally Compliant - Policy CS17 conflicts with the protection provided to European sites under the Habitats Regulations, as it does not provide an appropriate policy to mitigate/avoid the urban impacts arising from new housing development alone and in combination with similar development</p>	<p>The RSPB suggests the following wording changes to Policy CS17 to make it effective: 'Housing development within the Hindhead Concept Statement Area will be required to make appropriate contributions in accordance with the Hindhead Avoidance Strategy (2011). Employment development will also be required to make contributions unless it can be demonstrated that the proposal will not have a likely significant adverse effect on the ecological integrity of the Wealden Heaths Phase II SPA. Policy CS17 must set out a coherent approach to the implementation of strategic avoidance/mitigation measures for housing within the core visitor catchments, 9km from Wealden Heaths Phase 1 SPA and 5km from Wealden Heaths Phase 2 SPA, including the following principles: A 400m housing exclusion zone around the SPAs. For all net new housing between 400m and 9km or 5km, contributions towards strategic avoidance/mitigation must be made. Avoidance/mitigation to comprise SANGs and strategic on-site (SPA) access management and monitoring measures. Large developers to provide bespoke mitigation measures, to be considered on a case-by-case basis. This approach should be agreed and coordinated with neighbouring local authorities in order to address the 'in combination' effects of new housing.</p>	<p>The part of the policy relating to the Hindhead Avoidance Strategy provides very clear advice to developers i.e. they will be expected to make contributions (this is the default situation) unless they can demonstrate that their development is an exception by proving no likely significant effect. The Policy regarding development within 400m of Wealden Heaths (Phase 1 and 2) does not conflict with NE advice or research; it takes account of it by requiring any proposals for a net increase to demonstrate no Likely Significant Effect. This was specifically requested by NE to provide additional safeguarding. Secondly, the RSPB comment does not take account of degree of change (something which is not covered by the research) and therefore assumes that any increase (irrespective of scale) would lead to a likely significant effect. The HRA however concludes that the 4% population change which is expected within 400m will not lead to a likely significant effect and therefore mitigation would not be required. The HRA also explains how policy CS17 could be implemented: 'Given the strategic assessment and its conclusions, in most cases it may simply be necessary at the planning application stage to confirm that there is nothing in the planning application that deviates from the assumptions made for the strategic Core Strategy HRA (for example, as they relate to the scale of development within 400m of the SPA)'. The issue of recreational pressure on</p>	No change

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			surrounding the Wealden Heaths (Phases 1 & 2) SPAs.		<p>these sites was taken into account in detail in the HRA. The policy reflects the conclusion of the HRA that a strategic solution was not necessary for these sites, for the reasons set out in the HRA.</p> <p>The RSPB comments basically argue that a) the consultants have ignored the evidence regarding the impacts of recreation etc on heathland birds and that b) the same approach to the Thames Basin Heaths should be applied to all heathlands in the South East as a matter of principle. However, the consultants have not ignored the research they mention, it is referred to in some detail in the HRA. Most importantly, the research identifies the principle that heathland birds can be adversely affected by recreation. However, RSPB takes no account in their comments of the relative scale or density of existing or proposed development around this specific European site compared to the Thames Basin Heaths in making their comments, and that must clearly be a factor in determining whether an LSE will occur. While the fact that heathland SPA birds can be disturbed and affected due to increasing development/recreational pressure is established, whether they will be in a given situation cannot be determined generically. The Wealden Heaths SPA cannot be directly compared to the Thames Basin Heaths – the scale, density and pattern of development (both current and proposed) is considerably lower and there are many other recreational opportunities for</p>	

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					<p>people living near the Wealden Heaths SPA which is not the case for many people living close to the Thames Basin Heaths (e.g. in Surrey Heath district). This is discussed in the HRA report (e.g. paragraph 6.5.5 where we explain that ‘the population within 5km of the Thames Basin Heaths is approximately 750,000 people, compared to approximately 80,000 for Thursley Hankley & Frensham Commons SPA [Wealden Heaths Phase 1 SPA]. Moreover, the scale of additional housing proposed for easy recreational proximity to the SPA/SAC/Ramsar site is a fraction of that which will surround the Thames Basin Heaths’) which illustrates the completely different setting and population density. Although the HRA utilises work by UE Associates on the Wealden Heaths with regard to the overlapping of current visitor patterns and SPA bird territories as RSPB mention, the consultants have not relied exclusively on that data but also on a separately undertaken study (for the Hindhead Concept Statement HRA) by different consultants on another part of the SPA that reached a similar conclusion, correspondence from Natural England accepting that conclusion (paragraph 7.3.7 of the HRA report), bird population trend monitoring data analysis undertaken by independent ecologists and existing and future human population calculations. It is the cumulation of these data that informed the conclusion, not just the bird territory data, and one of the main pieces of evidence leading to the conclusion is</p>	

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					the minimal expected change in the human population within the catchment of the SPA (c. 2-4%, excluding Whitehill-Bordon for the reasons set out in the HRA) and the fact that with the delivery of SANGS for Whitehill-Bordon approximately 90% of new housing planned for the catchment of the SPA will be effectively neutralised.	
Ms Susan Solbra Southern Water	CSPS441	Policy CS17	Concerned that the policy wording is unduly restrictive. It is important that policies do not unduly restrict provision of essential wastewater infrastructure should the need arise. The policy does not make any clear distinctions between the hierarchy of international, national and locally designated sites and appears to apply them with the same level of protection. It could be argued that local sites have been awarded higher protection because there is no allowance for mitigation measures to allow essential infrastructure to progress.	Policy CS17 should be amended to permit essential utility infrastructure in locally designated sites if the benefit of the development outweighs any harm, and any adverse impact can be mitigated or compensated for. This would make the policy consistent with paragraph 113 of the NPPF. Propose the following additional text to the paragraph that starts "Within locally desingated sites...": "However, development to provide essential utility infrastructure will be permitted in designated areas in exceptional circumstances if any adverse impacts can be mitigated or compensated for."	The policy is considered to be consistent with para. 113 of the NPPF in that it set criteria based policies. Natural England are supportive of the policy as currently drafted.	No change
Mr Neville Carter TBRA	CSPS176	15.29	The assessor did not support the Natural England dictat. He described the evidence as weak. The final report was changed under legal pressure, which is hardly constitutional.		The principles underlying the Thames Basin Heaths Delivery Framework have already been subject to considerable technical scrutiny, have been endorsed by Natural England and formed part of the evidence base for the South East Plan that was taken into account when it passed Examination in Public in 2007 and was subsequently adopted by the Secretary of State in 2009.	No change

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Mrs Zofia Lovell: South Farnham Residents Association	CSPS120	15.30	The remaining "potential" SANG of 6.9 hectares in Farnham Park has not been deemed suitable because of problems of access and parking. The Council cannot guarantee that this position will change. There is no mention of what plans there are to provide SANGS in future. This omission means that the housing targets should not rely on Farnham to provide future housing requirements. Error in the calculations shown in this document (Note 6.9+2.3=9.2 and not as shown 9.3)	Because of the difficulties in providing SANGS, Farnham cannot be relied upon to provide future housing requirements. Therefore brown field sites elsewhere in the Borough, for example Dunsfold Park, should be considered as a "preferred location for accommodating housing growth"	Natural England have not raised any concerns over the adequacy of Farnham Park as a SANG. Given the lifespan of the Plan, the Council is confident that additional SANG capacity will come forward in the future to support the required housing.	Amend footnote li: unallocated capacity of 1.7ha (as at 19th November 2012)
Katie Newton Environment Agency	CSPS236	15.30	Dartford warblers are not ground-nesting birds, but nest in low shrubs. Paragraph 15.30 still refers to the Dartford warbler as a ground nesting bird. Correcting this paragraph would not alter the soundness of the plan but it should be considered if amendments are to be made.	None suggested	Agreed	Change para. 15.30 to read "ground or low shrub nesting birds"
Mrs Zofia Lovell: South Farnham Residents Association	CSPS121	15.31	This paragraph is not specific enough given the need to secure SANGS before development in the Farnham area takes place. Which sites, other than Farnham Park, have been identified? If the sites have not yet been secured for SANGS, at the very least, which sites are being considered? Are there any sites acknowledged in the Core Strategy that are appropriate and large enough to provide their own SANG?	The SPA and the issue of providing appropriate SANGS is of such great importance that Waverley, within the Core Strategy, must provide a clear plan as to how and where SANGS will be provided in the future. We need Waverley to come to the Examination armed with specific plans showing future designated sites.	Natural England have not raised any concerns over the adequacy of Farnham Park as a SANG. Given the lifespan of the Plan, the Council is confident that additional SANG capacity will come forward in the future to support the required housing.	No change

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
Mr Neville Carter TBRA	CSPS169	15.31	There is no evidence to support the NE advice and no proof of its efficacy.		The principles underlying the Thames Basin Heaths Delivery Framework have already been subject to considerable technical scrutiny, have been endorsed by Natural England and formed part of the evidence base for the South East Plan that was taken into account when it passed Examination in Public in 2007 and was subsequently adopted by the Secretary of State in 2009.	No change
Mrs Zofia Lovell: South Farnham Residents Association	CSPS122	Policy CS18	This concession included "developments of fewer than 10 dwellings" needs proper testing for soundness in respect of the duty to protect the SPA. This is not a concession for a minority of planning applications in Farnham - most of the new housing in Farnham over the past 10 years has resulted from small sized projects, as there is only rare opportunity for larger sites to be available. It is now a requirement to consider the cumulative impact of successive developments on the SPA.	To properly test for soundness this particular policy and consider the cumulative impact of successive developments on the SPA.	The principles underlying the Thames Basin Heaths Delivery Framework have already been subject to considerable technical scrutiny, have been endorsed by Natural England and formed part of the evidence base for the South East Plan that was taken into account when it passed Examination in Public in 2007 and was subsequently adopted by the Secretary of State in 2009. Natural England have not raised any concerns over the adequacy of Farnham Park as a SANG.	No change
Mr Andrew Whitaker: Home Builders Federation Ltd	CSPS190	Policy CS18	The Federation must re-iterate its request that the Council adopts a reasonable and flexible approach to development proposals in areas subject to this policy. The effect of restrictions being placed around SPAs is that of reducing the amount of land that could otherwise be reasonably used for residential use. This only results in other, less appropriate land coming under pressure for development. The Council therefore needs to consider this when assessing development proposals adjacent to such areas.	None suggested	The principles underlying the Thames Basin Heaths Delivery Framework have already been subject to considerable technical scrutiny, have been endorsed by Natural England and formed part of the evidence base for the South East Plan that was taken into account when it passed Examination in Public in 2007 and was subsequently adopted by the Secretary of State in 2009.	No change

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
Jenny Rickard: Surrey Heath Borough Council	CSPS230	Policy CS18	Policy is overly permissive. Policy CS18 to be amended to include references to non residential development and to include a statement that the Council will only permit development where it is satisfied that this will not give rise to likely significant adverse effects upon the integrity of the TBH SPA. Recognition of the Thursley, Ash, Pirbright & Chobham Common Special Area of Conservation in Policy CS17.	Policy CS18 to be amended to include references to non residential development and to include a statement that the Council will only permit development where it is satisfied that this will not give rise to likely significant adverse effects upon the integrity of the TBH SPA. Recognition of the Thursley, Ash, Pirbright & Chobham Common Special Area of Conservation in Policy CS17.	The main source of impact on the Thames Basin Heaths is from residential development. Although non-residential development could contribute (e.g. to urbanisation effects) it is appropriate that the policy focuses on the main source of impact. Although this specific policy does not contain the exact statement the Council is looking for, it does say that 'New residential development which is likely to have a significant adverse effect on the ecological integrity of Thames Basin Heaths Special Protection Area (SPA) will be required to demonstrate that adequate measures are put in place to avoid or mitigate any potential adverse effects' which amounts to the same thing since measures that would not enable a development to claim 'no likely significant effects' would by definition not be adequate. Policy CS2 clearly states that 'The Council will not permit residential development that either alone, or in combination with other development, would have a significant adverse effect upon the integrity of the European Sites' which covers this point. This would also obviate the need to have a specific policy about Thursley, Ash, Pirbright and Chobham SAC. Moreover, Waverley Council could not legally permit a development that was likely to have significant effects on any European site as a matter of law; as such, it does not need to also be stated in policy.	No change

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
Mr Andrew Macleod Farnham Society/Tim Cox	CSPS289	Policy CS18	- Clarify that this policy will only apply to areas within defined settlement boundaries where those settlements lie within the 5KM SPA protectionzone. - Clarify the wording of the policy component relating to developments of 10 or less houses.	None suggested	Noted	No change
Heather Twizell Natural England	CSPS356	Policy CS18	In Natural England's opinion the document is sound. Welcomes the inclusion of this policy setting out the principles of the strategic planning approach to the protection of the Thames Basin Heaths SPA. The policy captures all of the key elements from South East Plan Policy NRM6 and will ensure that if regional strategies are revoked in the future (as is the current Government's clear intention) that a level of policy protection remains for this important site.	None suggested	Noted	No change
Mr Norman Gillan Mono Consultants Ltd	CSPS429	Policy CS18	The policy on the 5km buffer zone needs to be amended to take account of the distribution of housing, travel patterns and it is considered unsound on that basis.	None suggested	The principles underlying the Thames Basin Heaths Delivery Framework have already been subject to considerable technical scrutiny, have been endorsed by Natural England and formed part of the evidence base for the South East Plan that was taken into account when it passed Examination in Public in 2007 and was subsequently adopted by the Secretary of State in 2009.	No change

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
Mr Jerry Hyman	CSPS430	Policy CS18	<p>Fails to comply with Planning & Compulsory Purchase Act 2004:</p> <p>Fails to comply with Habitats Directive: Article 8 (Reg.9) requires Council to have regard to Directive in conduct of its functions. Inspector in 2006 Core Strategy Examination criticised pre-determination of the spatial strategy and led to withdrawal. Where is the Waddenzee evidence? Housing numbers, targeting of Farnham for bulk of development show Council's failure to consider Habitats constraints until the spatial strategy was "done and dusted". Habitat Regulations Assessment was produced in July 2012 after Draft Core Strategy was decided and was not individually consulted upon. Lack of SANG to support Core Strategy. Evidence required to justify the Core Strategy does not exist. SA is therefore incomplete. A Habitats Article 6(3) Appropriate Assessment of the CS has not been conducted and published. Farnham Park SANG is ineffective, Avoidance Strategy fails to meet Waddenzee criteria of convincing objective scientific evidence. Based on car park on Hale Road without direction connection. 5km zone of influence is incorrect, SEP Assessor recommended 7km. 400m exclusion zone should be increased. SEP Assessor recommended 1km. No evidence to support 8ha/1000 SANG standard and no objective evidence to show that the SANG and SAMP strategies are effective. HRA gives no numbers for bird populations. Disagrees with HRA conclusion that Wealden Heaths bird numbers are not</p>	None suggested. Requires complete rewrite of Core Strategy	Requirement is to publish HRA with submission. HRA was drafted during preparation of Core Strategy and informed process. Natural England have been involved in advising on the Core Strategy at all stages and are supportive of the strategy. The principles underlying the Thames Basin Heaths Delivery Framework have already been subject to considerable technical scrutiny, have been endorsed by Natural England and formed part of the evidence base for the South East Plan that was taken into account when it passed Examination in Public in 2007 and was subsequently adopted by the Secretary of State in 2009.	No change

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
			<p>affected by human proximity. Surrey Heath Core Strategy EiP did not have Waddenzee evidence and policy was amended post-examination to require developers to provide Waddenzee evidence. Policy NRM6 of South East Plan requires housing development to be directed to areas of the Borough to avoid effect on SPAs, ie. Outside 7kms on SPA, such as Bramley, Wonersh, Shamley Green, Dunsfold and Cranleigh. Council have prejudiced Core Strategy process by failing to evidence decision to target Habitats affected areas rather than take lawful option of a new settlement at Dunsfold Park. Refers to Manydown (Basingstoke) decision. The housing target should be reduced to ensure AONB and Green Belt designations are respected and neighbouring borough unaffected by restrictions of Habitats legislation should make up for Waverley's underprovision. Other Inspectors have ignored Waddenzee judgment. Displacement effects are unknown. Duty to Co-operate - have not considered concept of addressing Habitats issues and sharing housing allocations accordingly.</p> <p>Fails to comply with EIA Directive: Fails to comply with Biodiversity/Habitats issues in NPPF and Circular 06/2005.</p>			

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
Mrs Alison Giacomelli RSPB	CSPS432	Policy CS18	Concerned that Policy CS18 on the Thames Basin Heaths SPA does not provide a sufficiently robust approach to dealing with the effects of recreational disturbance associated with the new housing proposed for the Borough. Therefore, we consider that the Core Strategy is unsound and not compliant with the Habitats Regulations. It fails to properly reflect one of the fundamental principles of the agreed Thames Basin Heaths SPA policy approach that, unless exceptional circumstances exist, all net new housing development between 400m and 5km from the SPA is required to contribute towards mitigation and avoidance measures. Concerned that it does not provide a clear and robust approach to large developments beyond the 5km from the SPA. The Thames Basin Heaths SPA Delivery Framework, footnote 6, recommends that large developments of over 50 houses between 5km and 7km from the SPA should be assessed on a case-by-case basis and may require mitigation. Policy CS18 does not provide clear guidance as to the potential need for bespoke mitigation measures for large developments.	In order to prevent inappropriate development coming forward, Policy CS18 must clearly reflect all of the key principles of the South East Plan Policy NRM6 (Thames Basin Heaths Special Protection Area) and of the Delivery Framework, including the following: 1. Mitigation of all new residential development within the 400m to 5km zone of influence. 2. Developments of over 50 houses between 5km and 7km from the SPA must be assessed on a case-by-case basis and may require mitigation. 3. SANGs capacity to be discounted on the basis of current ecological interests as well as current access levels. 4. Large scale development will require individual Appropriate Assessment under the Habitats Regulations and bespoke mitigation. Inclusion of these principles, alongside the exclusion of houses from the 400m zone, will ensure that the Core Strategy meets the tests of soundness set out in the National Planning Policy Framework. If revised in this way, it would be possible to conclude that the Core Strategy would not have an adverse effect on the integrity of the Thames Basin Heaths SPA, and, therefore, it would be legally compliant.	The RSPB are objecting to the inclusion of the phrase 'which the Council considers that either alone or in combination is likely to have a significant adverse effect on the SPA'; in their view it has already been demonstrated that mitigation is required for all net new residential development within 400m-5km of the SPA so this clause isn't needed. However, the inclusion of this phrase is legally correct: although it is acknowledged (and the Council clearly do acknowledge it through their reference to the TBH delivery framework) that net new residential development within 400m-5km will require mitigation, the Council still has a legal responsibility to make a judgment as to Likely Significant Effect that cannot be derogated, and the policy wording reflects that. There is nothing in the Core Strategy which says the Council will not be assessing large developments between 5km and 7km from the SPA, and since case-by-case assessment is required it doesn't really need a policy. By law the Council should be making some form of case-by-case judgment for every planning application as to whether there is scope for Likely Significant Effect. The approach to SANG capacity is in accordance with Natural England recommendations.	No change

16. Climate Change

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
Mr Neville Carter: Bourne Residents Association	CSPS166	16.4	Reference to South East Plan policies is redundant.	None proposed	Noted. The Core Strategy must be in general conformity with the South East Plan.	No change.
Mr Lee Dance: South East Water Ltd	CSPS127	Policy CS19	Supports Policy requirement to meet Code Level 4 for Water.	Recommend monitoring includes review of level of water efficiency that is actually secured.	Noted.	The Council will work with Water Companies to consider whether additional monitoring criteria are achievable.
Cranleigh Parish Council	CSPS154	Policy CS19	By 2016 all houses should be zero carbon, therefore policy of Level 4 Code for Sustainable Homes doesn't meet government policy.	None proposed	The government target is for zero carbon energy which is only part of Code for Sustainable Homes level 6. Policy CS19 seeks to go beyond the Government's plan to require energy efficiency to Code Level 4 in 2013. If energy to Code Level 6 is introduced in 2016, this will supersede the requirement in Policy CS19. It is not currently viable to require development to meet Code Level 6.	None
Mr Andrew Whitaker: Home Builders Federation Ltd	CSPS191	Policy CS19	Council need to consider implications of policies on viability. Refers to BRE Good Practice Guidance - Sustainable Design & Construction.	Policy should be reviewed to consider viability.	The viability of the Sustainable Construction policy has been informed by the Affordable Housing Viability Assessment which considered different levels of CSH in addition to affordable housing, infrastructure and SPA contributions. CLG have also produced annual reviews of the cost of complying with CSH.	No change

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
Mrs Kathy Smyth: Guildford and Waverley Friends of the Earth	CSPS261	Policy CS19	Code for Sustainable Homes may be abolished, therefore target for renewable energy on new development (suggest 20%) should be added as well as reference to Code 4.	Target for renewable energy on new development (suggest 20%) should be added as well as reference to Code 4.	The Council considers that the approach linked to the Code for Sustainable Homes is appropriate.	No change
Mrs Kathy Smyth: Guildford and Waverley Friends of the Earth	CSPS291	Policy CS19	Supports policy.	None proposed	Noted	None
Michael Conoley: Michael Conoley Associates	CSPS384	Policy CS19	Code 4 for Sustainable Homes is under consultation and not due to be adopted until April or October 2013, therefore no certainty with regard to energy, carbon dioxide and water components within this.	Requirement should only be code for Sustainable Homes Level 3.	Para. 94 of the NPPF states that LPAs should adopt proactive strategies to mitigate and adapt to climate change. Requiring energy and water aspects of Code Level 4 for development less than 10 dwellings is ahead of Building Regulations but is proactive and viable. Building Regulations are under consultation, not the Code itself.	None
Mr John Kelly: Berkeley Strategic	CSPS444	Policy CS19	Policy CS19 is too inflexible, doesn't take into account site specific constraints, viability, impact on townscape, landscape or historic environment.	Add to end of policy CS19: The criteria in this policy will be applied flexibly and the feasibility of meeting the criteria of this policy will be judged on a site by site basis and taking into account issues including viability, impacts on townscape, lan	Para. 16.28 states that technical and financial considerations will be taken into account if the developer is able to provide evidence to the Council.	No change
Lamron Estates	CSPS77	Policy CS19	Code Level requirements are unnecessary. Properly covered by Building Regulations and may be overtaken by future legislation. This matter is also covered by bullet point 2 later in the policy.	None proposed	Noted. NPPF states that LPAs should be proactive in addressing climate change.	No change

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
Mrs Kathy Smyth: Guildford and Waverley Friends of the Earth	CSPS264	Policy CS20	Recommend minor change to Policy CS20.	Amend criteria (v) of Policy CS20 to read: "availability of a suitable connection to electricity and gas distribution networks"	Agreed	Amend criteria (v) of Policy CS20 to read: "availability of a suitable connection to electricity and gas distribution networks"
Mrs Kathy Smyth: Guildford and Waverley Friends of the Earth	CSPS294	Policy CS20	Recommend minor change to Policy CS20	Minor modification not stated.	Noted	No change
Mr Stewart Edge	CSPS331	Policy CS20	Criteria in Policy CS20 should include reference to landscape designations. NPPF states LPAs should set criteria based policies to assess development in landscape areas, conservation of AONBs should be given great weight.	Suggested wording: Any proposed development in the National Park and AONB will be considered in accordance with advice in the NPPF (para. 115, 116) and the Council Policy in CS15 (noting its reference to the AGLV designation as well as AONB).	This issue is covered by Policy CS15: Landscape Character.	No change
Cranleigh Parish Council	CSPS147	16.31	Development should be directed away from areas of flooding. Large areas of Cranleigh are at risk of flooding. By 2016 all houses should be zero carbon, therefore policy of Level 4 Code for Sustainable Homes doesn't meet government policy.	Added protection for Cranleigh required.	Through the sequential approach the Policy does direct new development to areas with the lowest risk of flooding. Building Regs is only likely to require zero carbon for energy aspect of Code for Sustainable Homes.	No change
Katie Newton: Environment Agency	CSPS242	Policy CS21	Support the council requiring that there should be no increase in rate and volume of surface water run-off and encouraging reduced rates leaving brownfield sites.	None proposed	Noted	No change

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
Ms Kath Harrison: Surrey County Council	CSPS277	Policy CS21	Requests wording re: sequential test and requiring no increase in surface water runoff.	<p>Revise wording in para. 1c of Policy CS21 to read: Where sequential and exception tests have been undertaken and passed, any development that takes place where there is a risk of flooding will need to ensure that a site specific flood evacuation plan is included in any flood mitigation measures integrated into the design both on site and off site...</p> <p>Para. 2 : the final sentence should be amended to read: There should be no increase in either volume or rate of surface water runoff leaving the site. Those proposing development on brownfield sites should aim to reduce the run off to greenfield level (+ climate change).</p>	Agree changes to ensure clarity. The need for a site specific flood evacuation plan is set out in Section 9 of the Technical Guidance to the NPPF.	<p>Revise wording in para. 1c of Policy CS21 to read: Where sequential and exception tests have been undertaken and passed, any development that takes place where there is a risk of flooding will need to ensure that flood mitigation measures, including a site specific flood evacuation plan, are integrated into the design both on site and off site, to minimise the risk to property and life should flooding occur.</p> <p>Para. 2 : the final sentence should be amended to read: There should be no increase in either volume or rate of surface water runoff leaving the site. Those proposing development on brownfield sites should aim to reduce the run off to greenfield run off rates. There should be no property or highway flooding, off site for up to the 1 in</p>

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
						100 year storm return period including an allowance for climate change.
Mrs Kathy Smyth: Guildford and Waverley Friends of the Earth	CSPS293	Policy CS21	Difficulty obtaining building insurance due to risk of flooding. Some people, eg. pensioners cannot afford cover or cover has been refused. This should be addressed by Core Strategy.	Refer to issue of insurance cover against flood risk. Include in monitoring criteria.	It is not considered necessary to make a specific reference in the Plan to building insurance. The sequential approach aims to avoid new development being located in zones where the risk of flooding is the highest.	No change
Mr John Kelly: Berkeley Strategic	CSPS445	Policy CS21	Supports approach, however it is essential that Policy CS21 takes a holistic view in terms of site selection. Sequential approach fails to recognise other planning factors such as sustainability.	Amend criteria a in Policy CS21: "Through a sequential approach it is located in the lowest appropriate flood risk location in accordance with the NPPF and the Waverley Strategic Flood Risk Assessment (SFRA) having taken an holistic view regarding other issues such as location, access to facilities and overall sustainability.	The NPPF requires the Council to apply the sequential test which states that development should not be allocated or permitted if there are reasonable available sites appropriate for the proposed development in areas with a lower probability of flooding. The Exception test allows development to be located in zones with a higher risk of flooding if following the application of the sequential test it is not possible consistent with sustainability objectives to locate them in zones of the lowest risk. However, it is considered unnecessary to repeat the advice about the exception test in the Core Strategy given that it should only be applied once the Sequential Test has been undertaken.	No change
Mark Mathews: Thames Water Plc	CSPS91	Policy CS21	Generally support policy but seek reference to flooding from sewers. Sequential approach should be used in line with technical guidance to NPPF.	Make specific reference to flooding from sewers and require developers to show that as a result of their development, pluvial flooding will not occur either on or off-site further down the catchment.	Paragraph 16.30 refers to flooding from sewers. Policy CS21 refers to minimising the risk from flooding whilst not increasing the risk from elsewhere. As such it is considered that the impact of flooding on development and vice versa from both sewers and pluvial can be dealt with.	No change

Key Diagram

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
Wates Developments Limited	CSPS318	Picture .1	Key Diagram does not show any broad locations for strategic development and does not allocate any small/ medium sized greenfield sites for development.	Key diagram should show broad locations of strategic development.	The Council has set out its clear approach to identifying greenfield releases in Policy CS1. It has not included specific sites or locations, and as such it is not possible to identify these on the Key Diagram.	No change to Core Strategy Key Diagram.
Louise Piper Rushmoor Borough Council	CSPS80	Picture .1	Application of policies CP2 and CP15 together leaves the strategic gap between Aldershot and Farnham vulnerable to review as part of a subsequent document that will identify greenfield housing allocations. Risk exacerbated by failure to show on Key diagram the broad locations for proposed greenfield allocation around Farnham.	Identification of the broad location of the greenfield site allocation around Farnham on the key diagram.	See response to CSPS318	No change to Core Strategy Key Diagram.
Taylor Wimpey Strategic	CSPS389	Picture .1	Key Diagram does nothing to show the vision or the direction for the overarching strategy of the Council. As set out by the NPPF, "Local Plans should ...indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map..." (NPPF 157). This one does not.		See response to CSPS318	No change to Core Strategy Key Diagram.

Appendix D - Amendments to the Proposals Map

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
Surrey County Council	CSPS280	D.1	Appendix D Amendments to Proposals Map The County Council is currently reviewing major transport schemes in Surrey. Any major scheme that requires land outside of highway limits would need to be safeguarded in the proposals map of the new local plan. The map will similarly need to be updated to take account of any major scheme previously safeguarded which is abandoned.	None proposed	The review of major transport schemes has not yet taken place. Therefore no changes to the Proposals Map are currently proposed. The position will be reviewed prior to Examination.	None
Surrey County Council	CSPS282	D.2	Table D.2 Surrey Minerals and Waste Plans: Implications for Proposals Map (page 193) A minor amendment is suggested to this table to add, "Homefield site, south of A31" directly below the reference to the "Runfold site, south of A31". This is because the mineral safeguarding area shown on the Surrey Minerals Plan Proposals Map covers both Runfold South Quarry (Area C) to the west and Homefield Sandpit to the east. It is therefore considered misleading to refer to the area covered by these two sites as "Runfold site, south of A31". If Alton Road is allocated in the adopted Aggregates Recycling Joint DPD, this site will also need to be included on the Proposals Map through a proposed minor amendment or additional modification as appropriate.	Add reference to Homefield site, south of A31.	Agreed	Add: "Homefield site, south of A31" to Table D.2.
Surrey County Council	CSPS286	Table D.2	Proposals Map - Waste Management. The proposals map should be kept up to date to show latest policies and sites for waste management. A note can be added to the legend of the Proposals Map referencing the list of existing	None proposed	Noted. This will be considered separately from the Core Strategy	None

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
			<p>minerals and waste sites in SCC's AMR. A reference could further be included to indicate that copies of the AMR are available for inspection at SCC and on-line via the SCC website.</p>			

Appendix E - Monitoring and Implementation

Name/ Organisation	Rep. Number	Paragraph/ Policy	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
UCA	CSPS348	Table E.1	The University should be included as one of the Delivery Partners beside Objective 11. Once the necessary changes have been made, this part of the document will be sound as it will be in accordance with central government guidance.	The University should be included as one of the Delivery Partners beside Objective 11.	Agreed	Amend Table E.1 to include the UCA as a delivery partner for Objective 11.

Unclassified

Name/ Organisation	Rep. No.	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
Martin Grant Homes Ltd	CSPS408	<p>South East Plan is yet to be revoked. Reduction from South East Plan housing target of 250 per annum unfounded and does not meet identified need. SHMA identifies surplus requirement of 706 homes per annum. Council has failed to plan positively in respect of defined housing need, relying on development in neighbouring authorities to provide development. Therefore, Core Strategy is at odds with guidance in Policy CS2 of South East Plan and Paras 157, 178-182 of NPPF. Approach to housing delivery is not "diligent" as required by para. 178 of NPPF regarding duty to co-operate. There has not been any objective collaborative assessment of housing need across boundaries with Waverley and Rushmoor. Without objective analysis of household movement in the sub region, fails to fully assess housing needs of neighbouring authorities as well as their constraints to delivery of housing in sub region.</p>	<p>The Council need to act positively to increase their housing supply to aid to meet the clearly defined need (706 dpa annual need v 230 dpa housing supply) including undertaking objective assessment of cross boundary need.</p>	<p>Waverley is not within any 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. It is also considered that there is a reasonable case to revert to the South East Plan Option 1 figure of 230 homes a year 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> <p>The 230 dwellings per annum in Policy CS2 is the figure that was contained in the South East Plan before it was increased by the Secretary of State on the recommendation of the Examination in Public Panel. The Council considers that the approach strikes the right balance between delivering new homes needed in the area whilst recognising the rural character of the area and the various constraints including the Green Belt, landscape designations and biodiversity designations which together with limitations on access to services and public transport, restrict the suitability of land to accommodate new homes in a sustainable way.</p> <p>The Council's Duty to Cooperate Report sets out how the Council has liaised and worked with other Local</p>	None

Name/ Organisation	Rep. No.	Summary of Representation	Changes Proposed by Representation	Council Response	Implications for Core Strategy
				Planning Authorities on its Core Strategy.	
Mr. J. Hyman	CSPS415	Comments on SCI, SA, AA/HRA, SEP, SCS, Planning Regs, Duty to Co-operate dealt with under other chapters.	Core Strategy requires complete revision.	Refer to responses to comments in other chapters.	None
Southern Water	CSPS439	No policy within Core Strategy to prevent sensitive development such as housing being adequately separated from wastewater treatment works and major pumping stations to safeguard amenity. Therefore not consistent with paras. 17 and 120 of NPPF.	New policy required to ensure amenity of new development is safeguarded. Suggested wording: "Development proposals in proximity to existing wastewater facilities will only be permitted if there is no unacceptable impact on the amenity of future occupants. The distance between the infrastructure and the development must be sufficient to allow adequate odour dispersion."	The compatibility of land uses is addressed through Policy D2 of the existing Local Plan. Such a policy would be considered through the Development Management and Site Allocations DPD	None
Miss L. S. Dadak	CSPS471	No more building until ... are removed off pavements, gullies, gutter and ditches cleaned, and basic infrastructure cleaned up for existing residents	None suggested	Noted	None