

To: All Members of the Executive
(Other Members for Information)

When calling please ask for:
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Date: 16 February 2018

Dear Councillors

SPECIAL EXECUTIVE - 20 FEBRUARY 2018

I refer to the agenda for the Special Executive, on Tuesday, 20 February 2018 and now enclose the following item which was marked To Follow in your agenda papers:

3. WAVERLEY BOROUGH LOCAL PLAN PART I: ADOPTION (Pages 3 - 134)

Following the Examination of Local Plan Part 1: Strategic Policies and Sites, the Council has now received the final report from the Local Plan Inspector. Subject to some specific required modifications, the Inspector considers the Plan to be sound. The next step in the process is for the Council to formally adopt the new Local Plan. In order to do so, the Council must incorporate all the Main Modifications identified in the Inspector's report. This report updates members on this matter and includes the observations and comments from the special meeting of the Environment Overview and Scrutiny Committee which met on 15 February 2018.

Recommendation

It is recommended that the Executive recommends to the Council that

- 1. the Waverley Borough Local Plan Part 1: Strategic Policies and Sites, which incorporates the Inspector's Main Modifications and the Council's Minor Non-Material Modifications, be adopted; and**
- 2. those policies within the Waverley Borough Local Plan 2002 that are not being retained as set out in Appendix B of the Waverley Borough Local Plan Part 1: Strategic Policies and Sites, which incorporates the Inspector's Main Modifications and the Council's Minor Non-Material Modifications, be withdrawn.**

Yours sincerely

Emma McQuillan
Democratic Services Manager

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WAVERLEY BOROUGH COUNCIL

SPECIAL EXECUTIVE - 20 FEBRUARY 2018

COUNCIL – 20 FEBRUARY 2018

Title:

WAVERLEY BOROUGH LOCAL PLAN PART 1: ADOPTION

[Portfolio Holder: Cllr Chris Storey]

[Wards Affected: All]

Summary and purpose:

Following the Examination of Local Plan Part 1: Strategic Policies and Sites, the Council has now received the final report from the Local Plan Inspector. Subject to some specific required modifications, the Inspector considers the Plan to be sound. The next step in the process is for the Council to formally adopt the new Local Plan. In order to do so, the Council must incorporate all the Main Modifications identified in the Inspector's report. This report updates members on this matter and includes the observations and comments from the special meeting of the Environment Overview and Scrutiny Committee which met on 15 February 2018.

How this report relates to the Council's Corporate Priorities:

The Waverley Borough Local Plan and its policies will have an important role in supporting and delivering Corporate Priorities, including protecting the environment and delivering affordable housing.

Financial Implications:

There will be costs in terms of the design and printing of the new Local Plan and accompanying maps. These will be managed within existing resources. The Council will be able to recover some of these costs through the subsequent sale of hard copies of these documents.

The Local Plan is a major exercise and has significant costs associated with its production, including various consultations and the examination process. Waverley has a standing budget of some £67K for external costs and has in recent years topped this up with an additional £80K to provide for the cost of the revised Plan.

Adoption of the new up-to-date Plan should bring greater certainty to decision making and lessen the risk of appeals and their associated costs.

Legal Implications:

Now the examination process is complete, the Council must formally adopt the Local Plan to bring it into force. While the Council is not legally required to adopt the Local Plan, it is encouraged to follow the Inspector's recommendation to adopt. The Local Plan must be adopted by resolution of a meeting of the full Council.

The Council must not adopt a development plan document unless they do so in accordance with section 23 of the Planning and Compulsory Purchase Act 2004 ("the 2004 Act"). This means that the Council may only adopt a development plan document where

the person appointed to carry out the independent examination of that document recommends it to do so. Therefore, the Council may only adopt the Local Plan with the specific required Main Modifications, (subject to additional modifications if the additional modifications (taken together) do not materially affect the policies that would be set out in the document if it were adopted with the main modifications but no other modifications) as this is the version the Inspector has concluded meets the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness.

If the Council does not formally adopt the Local Plan, it will need to consider whether to withdraw it and prepare a new document for submission. In terms of planning policy, the Council would in such circumstances have to rely on existing local plan policies which are becoming increasingly out-of-date. Under those circumstances, the Council would continue to face speculative planning applications which are often difficult to resist. The Council would continue to be involved in an unsatisfactorily high number of planning appeals which would be difficult to defend, particularly in terms of demonstrating a five-year supply of housing. Such a situation would increase the risk of the Council failing to meet Government 'special measures' targets in respect of quality of decision making. This could result in the loss of control of decision-making powers, enabling planning applications to be determined by the Planning Inspectorate.

For decision making purposes, not having an up-to-date development plan means that permissions will be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.

Adoption of a Local Plan which meets the test of soundness would provide the Council as Planning Authority with the opportunity to proactively control development with the Borough in a way which has become increasingly difficult over the past few years. The Council would be in a position to positively shape the Borough, both in terms of development within it and as a place for the future.

Challenges/Intervention

On 3 August 2017, a letter was sent by POW Campaign Limited and eight Parish Councils to the Secretary of State requesting him to exercise his powers under the 2004 Act by intervening in the Local Plan examination process. The Secretary of State confirmed that the Inspector should be given the opportunity to issue his final report before the request to intervene is considered. The request is currently before the Secretary of State and remains outstanding; it is not before members of the Council for their consideration. Only a direction from the Secretary of State could prevent the Council from adopting the Local Plan and no such direction has been made. The request does not therefore prohibit the Council from adopting the Local Plan.

If the Council resolves to adopt the Local Plan, a 6-week period will begin to run during which any person aggrieved by the Local Plan may make an application to the High Court on the ground that a) the document is not within the appropriate power or b) a procedural requirement has not been complied with. The Council would robustly defend the Local Plan and its validity should a challenge be made post-adoption.

Introduction

1. As Members are aware, the new Local Plan for Waverley is being produced in two stages. Local Plan Part 1 (LPP1) sets out the overall strategy along with strategic planning policies and some strategic site allocations. Local Plan Part 2 (LPP2) will deal with other allocations of land as well as setting out the more day to day development management policies.
2. This report relates to LPP1, which includes the overall target for the number of new homes to be built over the plan period from 2013 to 2032, as well as their broad distribution. In addition to providing the strategic framework for the development of LPP2, it also provides the necessary framework for the completion of the various Neighbourhood Plans that are in preparation across the Borough.

The Examination of Local Plan Part 1

3. Members are reminded that on 29 November 2016 the Council approved LPP1 for submission for examination. The Plan was subsequently submitted to the Government in December 2016. The submission triggered the formal process of examination by the appointed Inspector. The purpose of the examination has been for the Inspector to assess the Plan against the various tests of soundness, including considering whether the Plan is consistent with national policy. The Inspector has also assessed the Plan for compliance with various legal and procedural tests, including whether the Council has met the Duty to Co-operate.
4. Much of the examination by the Inspector has been conducted through a review of the written evidence, including the documents submitted by the Council, as well as the various representations that were received in response to the pre-submission consultation, that took place between August and October 2016. In addition the Inspector set out a number of questions that the Council has responded to and he also published his 'Matters and Issues for Examination' and various parties were invited to respond to these.
5. Between 27 June and 6 July 2017 the Inspector held a number of Hearing Sessions. These were conducted through a round table discussion against a agenda set by the Inspector. This was to allow the Inspector to hear more evidence on certain matters to enable him to come to a conclusion on the issue of soundness. During these Hearings, the Inspector set out his preliminary conclusions on key matters. For example, his conclusions around the need for new homes and his view that, in order for the Plan to be sound, Waverley should be making a contribution towards meeting some of the unmet housing need arising within the Housing Market Area (HMA).
6. Prior to the closure of the Hearings, the Council produced a Headline Note of the modifications required to make the Plan sound, based on the Inspector's preliminary conclusions. That Headline Note was agreed by the Inspector. Following this, the Council worked up a schedule of these 'Main Modifications' for agreement with the Inspector and these were subject to consultation in September/October 2017. The responses to the consultation were all then reviewed by the Inspector before he reached his final conclusions. As part of this process, the Inspector also identified some additional questions for the Council.

The Council responded to these and these responses also informed the Inspector's conclusions.

The Inspector's Report

7. The Council has now received the Inspector's report, a copy of which is attached as Annexe 1, and the following text highlights some of the key points in the report. The headline is that, subject to certain specific required modifications, the Inspector considers the Plan to be 'sound'. These modifications, which are attached as a schedule to the report, include the expected increase in the overall housing target from 519 homes per annum in the submitted Plan, to 590 homes per annum. This includes an allowance for meeting unmet need elsewhere in the HMA. Other Main Modifications include some changes to the Green Belt policy to provide more clarity/certainty, including the removal of land at Aaron's Hill from the Green Belt in LPP1 (that decision had previously been deferred to LPP2), and a new policy SS7A, relating to design for the new settlement at Dunsfold Aerodrome. All of the required Main Modifications were expected, given the preliminary conclusions expressed by the Inspector at the Hearings.
8. Having considered all the representations and the evidence, the Inspector identified three main issues upon which the soundness of the Plan depends:
 - Whether the Plan makes adequate provision for new housing;
 - Whether the spatial strategy is sound, including all its component parts; and
 - Whether the development management policies of the Plan are clear, effective and consistent with statute, Government policy and guidance.
9. In relation to the first issue the Inspector concludes that the objectively assessed need is for 495 dwellings per annum (dpa), taking account of the 2014-based household projections and with an uplift of 25% in response to market signals. (Paragraphs 19 to 25). He then analyses the issue of unmet need elsewhere in the HMA, specifically Woking, and concludes that Waverley should be accommodating half of the identified unmet need from Woking. This amounts to 83 dpa. (Paragraphs 26 to 29). Finally, he considers the issue of migration from London and concludes that this adds a further 12 dpa to the need, resulting in a final figure of 590 dpa or 11,210 dwellings over the whole Plan period from 2013 to 2032. (Paragraphs 30 and 31).
10. In considering the number of homes that should be planned for in Waverley, the Inspector takes account of the various environmental issues that could impact on the ability to accommodate this number of homes. However, having considered these issues, the Inspector concludes that: *"...there is no convincing evidence that 11,210 dwellings over the Plan period, or 590 dpa, cannot be delivered in a sustainable manner."* He goes on to say: *"...none of the evidence suggests the need for a policy intervention on environmental grounds to reduce the housing figure below the identified requirement of 11,210 dwellings over the plan period."* (Paragraph 39).
11. The Inspector considers the housing trajectory and housing supply in some detail. For example, he considers that the assumptions about delivery rates at Dunsfold Aerodrome, both over the Plan period, and in the first five years, are reasonable. (Paragraph 45) He also considers that other elements of the Council's housing

trajectory and 5 year housing supply are based on reasonable assumptions. (Paragraph 46). The Inspector acknowledges that Local Plan Part 1 is strategic and does not aim to allocate a full range of sites. Therefore, he says that Local Plan Part 2 is an essential element of the Council's housing delivery strategy. (Paragraph 48). He considers that there are enough indications to be confident that the housing requirement will be delivered over the Plan period, with the assistance of Local Plan Part 2 and neighbourhood plans. (Paragraph 49).

12. In recent appeals there has been some debate about the role that sites in the Land Availability Assessment (LAA) can make towards the five year housing supply. The Inspector addresses this point and says that it is reasonable for the Council to assume that some of these sites are capable of making a contribution to the five year housing land supply. (Paragraph 51). He also concludes that in terms of the buffer to the five year supply, this should be set at 5%. (Paragraphs 52 to 55). Again, Members may be aware that in recent appeals, Inspectors have been inclined towards using a higher 20% buffer.
13. The Inspector does acknowledge the risks to the housing supply and considers that these point strongly to the need for the Council to adopt a positive approach towards housing provision and bring forward Part 2 of the Plan and encourage the neighbourhood plans to identify sites as early as possible. (Paragraph 57).
14. In relation to the second issue, the Inspector has assessed the various components of the spatial strategy as set out in Policy SP2. He considers that focussing new development on the four main settlements is a sound approach. (Paragraph 65). In relation to the distribution, the Inspector comments on the allocation of the uplift in the housing requirement. He notes that the allocation at Dunsfold Aerodrome was not increased to accommodate any of the uplift. He states that this is because the figure of 2,600 is based on a realistic and achievable rate of delivery and that any allocation above 2,600 would carry the risk that the housing requirement would not be met over the Plan period. (Paragraph 66).
15. In relation to the Green Belt, the Inspector comments that the 2014 Green Belt Review was a comprehensive and well-judged piece of work. (Paragraph 72). He concludes that the changes to release some land from the Green Belt (in Godalming and some of the villages) are justified by exceptional circumstances, but that the original proposals in the Plan to include new land in the Green Belt in Cranleigh and Farnham are not justified by exceptional circumstances. (Paragraphs 75 and 76).
16. The Inspector discusses the issue of Dunsfold Aerodrome in some detail. He considers that it is clear from the evidence that a large housing allocation at Dunsfold Aerodrome is a much better and more sustainable option than a smaller allocation or no allocation at all on the site. (Paragraph 77). He gives a number of reasons for taking this view. His overall conclusion is that the allocation at Dunsfold Aerodrome is a key part of the sustainable growth strategy for the Borough. He considers that it provides an excellent opportunity to meet a significant part of the housing needs of the Borough, including affordable housing, on a brownfield site. He considers it to be a good example of pro-active planning to achieve co-ordinated, well designed sustainable development and it offers opportunities for comprehensive urban design and master planning and social and transport facilities that smaller peripheral greenfield sites cannot usually offer. (Paragraph 93).

17. In his assessment of the spatial strategy, the Inspector also comments on the individual settlements. In relation to Farnham, he comments that it has the largest allocation of housing because it is the biggest town with a good range of shops, services, social and transport facilities. He also comments on the uplift in the housing number at Farnham and says that it is an entirely reasonable and moderate increase. (Paragraph 94). He notes the situation with the Farnham Neighbourhood Plan in terms of its housing allocation, which is lower than that required as a result of the uplift in the housing requirement for the Local Plan. He says that the increase in the Local Plan housing requirement does not make the Neighbourhood Plan itself unsound. However he says that further housing allocations at Farnham will be necessary, with the probable need to adjust the built up area boundary. He says that these changes will not diminish the importance or relevance of the work carried out to produce the Neighbourhood Plan, which will remain part of the statutory development plan. (Paragraph 99). He notes that Farnham Town Council has made a case for introducing a phasing policy which would delay the necessary additional allocations at Farnham until later in the Plan period. However, the Inspector does not support this approach. He says that the matter must be considered in the wider context, including housing need and affordability. He says that Farnham, being the largest town, has a key role in delivering the housing requirement and ensuring that a five year supply is maintained. (Paragraph 101).
18. The Inspector also considers the issue of SANG provision in Farnham in the light of the uplift in housing numbers. In particular, he does not agree with the suggestion by Natural England that the Plan is unsound unless a new SANG is identified now. He says that there is no prospect of harm to the SPA, because permissions cannot be granted without suitable avoidance measures and mitigation measures. He says the real question is whether enough SANG will be identified in due course to allow for the timely delivery of housing. (Paragraph 103). He has considered the work the Council is doing to identify further SANG for the future, and considers that the range and variety of potential solutions provide sufficient confidence that SANG will be identified and provided to support the additional housing required in Farnham. (Paragraph 105).
19. In relation to the other main settlements, the Inspector again concludes that the strategy and housing allocations are sound. In Godalming, this includes the release of land from the Green Belt at Binscombe and Aaron's Hill to help to accommodate Godalming's housing need. In Haslemere, the Inspector recognises that the allocation, even with the uplift, remains relatively low because of the presence of Green Belt and the AONB. In relation to Cranleigh, the Inspector considers that it is suitable for accommodating strategic allocations. He considers the apportionment of development to Cranleigh is in accordance with the spatial strategy and is sound. (Paragraphs 109 to 118).
20. The Inspector also supports the approach in relation to the villages, including the villages being inset from the Green Belt. In relation to Milford, this includes supporting the allocation of the land at Milford Golf Course, which the Inspector regards as a very well-chosen site. The Inspector considers its release from the Green Belt to be justified by exceptional circumstances. (Paragraph 125). In assessing the case for including this site in the Plan, the Inspector was mindful of the existence of a covenant on the land limiting development to 27 dwellings. However, he felt that the circumstances of this case, point to a reasonable prospect

of the covenant being varied, modified or discharged to enable to full capacity of the site to be achieved. (Paragraph 122). The Inspector also supports the two-stage process in terms of other Green Belt changes around Milford, Witley, Chiddingfold and Elstead, where the broad locations for change are shown in Local Plan Part 1, but with the detailed Green Belt boundary being resolved through Local Plan Part 2. (Paragraphs 74, 75, 119, 126, 127 and 128).

21. Turning to the third issue, the Inspector comments on a number of the other development management policies in the Plan where some modifications are required in order for these policies to be sound. (Paragraphs 130 to 140).

Adopting the Local Plan

22. The next stage in the process is for the Council to adopt LPP1. If adopted, the Plan would receive full weight for the purposes of planning decision making and would replace a number of the policies in the 2002 Local Plan. Importantly, the Inspector has made it clear that the Main Modifications set out in the schedule attached to his report are required in order for the Plan to be 'sound'. In relation to the Plan without these modifications the Inspector states: *"The Plan has a number of deficiencies in respect of soundness for the reasons set out above, which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act."* To be clear, the Council must adopt all of the Main Modifications for the Plan to be sound.
23. In addition to the Main Modifications accompanying the Inspector's report, there are some minor modifications that have been identified. These are a combination of typing corrections, factual updates and other minor changes for clarity/consistency. Some of these were identified in the Schedule of Minor Modifications produced at the time of the consultation on the Main Modifications. Officers have identified further minor modifications that have been incorporated in the Plan for adoption and a schedule of these is attached. A final complete copy of the Plan, which incorporates the main modifications and the minor non-material modifications, has been circulated separately to all Members of the Council to accompany this report and should be brought along to the Special Executive and/or Council meetings.
24. Officers understand some of the concerns that have been raised about the Modifications, particularly the increase in the overall housing target and the resulting increase in the housing allocations to individual towns/parishes. However, the Plan has been through a thorough examination process over the past 12 months and the Inspector has come to the conclusion, having considered all of the evidence, that the Modifications to the Plan are needed in order for it to be sound. Members will know that both in written responses to the Inspector's questions and during the Hearings, Officers, on behalf of the Council, strongly put forward arguments that Waverley was not considered to be able to accommodate an increase in housing over and above that planned for in the submission version of the Plan. However, the Inspector did not agree with these assertions, on the basis of the evidence, nor that these arguments outweighed the need to deliver housing to address unmet needs.

Benefits of Adopting the Plan

25. Adopting the Plan would bring a number of significant benefits for the Council and the Borough, including:
- Bringing key planning policies up-to-date;
 - Being better able to defend its position against speculative proposals that are inconsistent with planning policy as set out in the Plan. Planning applications will have to be decided in accordance with the new Plan unless material considerations indicate otherwise;
 - Being better able to defend its position in relation to 5-year housing supply;
 - Providing certainty in relation to housing numbers and other key strategic policies to enable local communities to complete their Neighbourhood Plans;
 - Being able to move forward with the adoption and implementation of the Community Infrastructure Levy (CIL), which will provide the basis for the provision of necessary infrastructure to support growth.

Risks of not Adopting

26. There are clear risks to the Council were it to decide not to adopt the Plan. These include:
- The lack of an up-to-date plan would mean that the Council would continue to be highly vulnerable to more speculative development that may be difficult to resist;
 - It would be more challenging for the Council to defend its 5-year housing supply position;
 - The Inspector's Report has established the principle in planning terms of the suitability of a new settlement at Dunsfold Park, subject to the modifications recommended. This is clearly a public document and, going forward, it will constitute a material consideration of considerable weight in the consideration of current and future planning applications on the site including the current "called in" application. Even if the Plan is not adopted, the Inspector's Report will remain a current and valid planning material consideration where it is relevant to planning proposals. If the Plan is not adopted, the Council will not have the benefit of specific policies (SS7 and SS7A) (and the Development Plan primacy weight which will be attached to them) against which to assess proposals coming forward. The loss of these policies as a policy framework will weaken the Council's ability to deliver development on the site in the most sustainable and appropriate way.
 - Similarly, and more generally for the entire Borough, if the Plan is not adopted, the Council will lose the up to date and firm basis, which the Plan provides, to support growth in the Borough over the next 15 years. The Inspector's conclusions, including that the housing requirement should be 590 dwellings a year, will remain a material consideration of considerable weight in planning appeals and as the basis for the 5 year housing land supply. Some Planning Inspectors have already concluded that this emerging figure is the starting point for Waverley's housing requirement given the Inspector's earlier conclusions at the Examination Hearings. Even if the Plan is not adopted, the Borough will continue to experience development pressure to meet this housing requirement. The Plan policies will provide the Council, on behalf of the the community, with suitable control to shape the location and form of growth in the future. The absence of an adopted plan will not stem development pressure but at the

same time will significantly reduce the Council's ability to shape its location and form.

- A significant set-back in terms of the timescale for getting a Local Plan in place, with the attendant risks of Government intervention. The Government gave local authorities a deadline to submit a Local Plan. Waverley successfully met that deadline. Nationally, the Government is taking overt remedial action to intervene where other local authorities have not met that deadline. A decision not to adopt the Plan would place Waverley in a most vulnerable position with respect to potential Government intervention. This would have clear reputational consequences;
- It would make it very difficult for Neighbourhood Plans to be completed, particularly those intending to deal with housing allocations, in the absence of the overarching strategy set by the Local Plan;
- The lack of certainty over the amount of development coming forward and the policies needed to guide the development, may make it more difficult for the Council to move forward with its plans to adopt CIL. A delay in the CIL timetable would mean a potential loss of CIL revenue to support infrastructure provision.
- Even a delay in the timescale for adoption is undesirable. This would lead to further uncertainty in relation to the Council's strategic policy position and create further difficulties in handling ongoing development proposals in the Borough.

Conclusion

27. Having regard to the Inspector's findings, and the clear benefits of having an up-to-date Plan in place, Officers strongly recommend that the Council adopts the Plan incorporating all of the modifications required by the Inspector to make it sound.
28. The receipt of the Inspector's report and its positive finding that the Plan is 'sound' with certain modifications, is the successful culmination of over 4 years' work since the Council withdrew its earlier Core Strategy from its examination. The Council now has the opportunity to put the new Local Plan in place and to provide the necessary platform for the completion of both Local Plan Part 2 and the various Neighbourhood Plans that are in preparation.

Observations and Comments

29. On 13 February 2018, two information briefing sessions on the Inspector's report were held for all councillors and Town and Parish representatives. The comments from those sessions are attached as Annexe 2.
30. The Environment Overview and Scrutiny Committee met on 15 February 2018 to scrutinise the report, and their comments are set out below:

The Committee considered the report at length, and questioned Officers on a number of key issues in relation to the additional housing numbers and their distribution, the deliverability of housing, the proposed release of Green Belt, and the robustness of the evidence base.

The Chairman questioned the soundness of the Modified Plan in respect of a number of matters that, in his opinion, had not been adequately addressed, including: the lack of an Appropriate Assessment containing bird numbers and an assessment of mitigation proposals; the outstanding Natural England

objection; concerns in relation to the approach to air quality; and the evidence to support Waverley taking part of Woking's unmet housing need.

With the exception of the Chairman, the Committee was satisfied with the responses of the Officers and the explanation of the evidence the Inspector had considered in reaching his conclusions. The clear majority view of Members was that whilst there were elements of the Local Plan that were disappointing from their Ward perspectives, what was now best for Waverley as a whole was to have an adopted Plan in place as soon as possible.

The Committee felt that adopting the Modified Plan, which the Inspector had found to be sound after a rigorous examination, would return control of development management to the Council and going forward would provide a level of protection to communities that had been absent for a number of years. It would allow Neighbourhood Plans to progress alongside the work on Local Plan Part 2, and income to be generated from developers to fund infrastructure through the implementation of the Community Infrastructure Levy.

On balance, and with the exception of the Chairman, the Committee agreed that not to adopt the Modified Plan would be to fail the Borough. The advantages of having an adopted Local Plan outweighed the risks of rejecting it at this stage, and any personal reservations about the housing numbers.

Recommendation

It is recommended that the Executive recommends to the Council that

1. the Waverley Borough Local Plan Part 1: Strategic Policies and Sites, which incorporates the Inspector's Main Modifications and the Council's Minor Non-Material Modifications, be adopted; and
2. those policies within the Waverley Borough Local Plan 2002 that are not being retained as set out in Appendix B of the Waverley Borough Local Plan Part 1: Strategic Policies and Sites, which incorporates the Inspector's Main Modifications and the Council's Minor Non-Material Modifications, be withdrawn.

Background Papers

There are no background papers (as defined by Section 100D(5) of the Local Government Act 1972) relating to this report.

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Report to Waverley Borough Council

by Jonathan Bore MRTPI

an Inspector appointed by the Minister for Housing, Communities and Local Government

Date 01 February 2018

Planning and Compulsory Purchase Act 2004

(as amended)

Section 20

Report on the Examination of the Waverley Borough Local Plan Part 1

The Plan was submitted for examination on 21 December 2016.

The examination hearings were held between 27 June and 6 July 2017.

File Ref: PINS/R3650/429/8

Abbreviations used in this report

AGLV	Area of Great Landscape Value
AONB	Area of Outstanding Natural Beauty
DtC	Duty to Co-operate
HMA	Housing market area
HRA	Habitats Regulations Assessment
LAA	Land Availability Assessment
LDS	Local Development Scheme
MM	Main modification
NPPF	National Planning Policy Framework
OAN	Objectively assessed need
PPG	Planning Practice Guidance
PPTS	Planning Policy for Traveller Sites
SA	Sustainability appraisal
SAC	Special Area of Conservation designated under European Council Directive 92/43/EEC (The 'Habitats Directive')
SAMM	Strategic Access Management and Monitoring
SANG	Suitable Alternative Natural Greenspace
SCI	Statement of Community Involvement
SPA	Special Protection Area designated under European Council Directive 2009/147/EC (The 'Birds Directive')
SHMA	Strategic housing market assessment
TA	Transport assessment

Non-Technical Summary

This report concludes that the Waverley Borough Local Plan Part 1 provides an appropriate basis for the planning of the Borough provided that a number of main modifications (MMs) are made to it. Waverley Borough Council has specifically requested me to recommend any MMs necessary to enable the Plan to be adopted.

Following the hearings, the Council prepared schedules of the proposed modifications and carried out sustainability appraisal of them. The MMs were subject to public consultation over a six-week period. I have recommended their inclusion in the Plan after considering all the representations made in response to consultation on them. The detailed wording of MM11 and MM16 has been slightly altered post-consultation to reflect the NPPF and for the sake of clarity.

The Main Modifications can be summarised as follows:

- Modifications to increase the housing requirement in the Borough, with revised figures for individual towns and parishes, to take account of market signals in relation to housing affordability, and to meet a proportion of the unmet housing need in the housing market area. Among the consequential changes are statements to the effect that the forthcoming Waverley Borough Local Plan Part 2 will make site allocations of any size to enable the housing requirement to be achieved.
- Modifications to the Green Belt policy, brought forward by the Council, to allow certain sites to be removed from the Green Belt and either incorporated within the built up area boundaries or allocated for housing, to ensure an adequate supply of housing land where it is needed; to bring greater clarity to the proposals to remove certain villages from the Green Belt and allow their detailed Green Belt boundary changes to be defined in Local Plan Part 2; and to delete proposed additions to the Green Belt which are not supported by sufficient evidence to demonstrate exceptional circumstances.
- Modifications to the wording of the policy relating to Dunsfold Aerodrome, to ensure that the development contains sustainable transport measures and adequate mitigation for its transport impacts; and the introduction of a new policy for Dunsfold Aerodrome to establish the design principles for the site and the processes by which the design of future proposals will be considered.
- Modifications to a range of policies to ensure consistency with the NPPF and Planning Practice Guidance, to achieve greater clarity or to update their contents.

Introduction

1. This report contains my assessment of the Waverley Borough Local Plan Part 1 in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework (NPPF), paragraph 182, makes it clear that, in order to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy.
2. The starting point for the examination is the assumption that the local planning authority has submitted what it considers to be a sound plan. The Waverley Borough Pre-Submission Local Plan Part 1: Strategic Sites and Policies was published for consultation in August 2016. This is referred to in this report as "the pre-submission plan"; it was the basis for the examination, and the list of main modifications relates to it because it was the version that was subject to consultation. Following the consultation, the Council published a "tracked changes" version of the plan, showing modifications it was proposing to make as a result of consultation responses. This was submitted for examination in December 2016 and was the version referred to for the sake of convenience during the hearings. It is referred to in this report as "the submitted plan".

Main Modifications

3. In accordance with section 20(7C) of the 2004 Act, the Council requested that I should recommend any main modifications [MMs] necessary to rectify matters that make the Plan unsound and thus incapable of being adopted. My report explains why the recommended MMs are necessary. The MMs are referenced in bold in the report in the form **MM1**, **MM2**, **MM3** etc, and are set out in full in the Appendix.
4. Following the examination hearings, the Council prepared a schedule of proposed MMs and these were subject to sustainability appraisal. The MM schedule was subject to public consultation for six weeks. I have taken account of the consultation responses in coming to my conclusions in this report and in this light some amendments have been made to the detailed wording of MM11 and MM16. These amendments do not significantly alter the content of the modifications as published for consultation or undermine the participatory processes and sustainability appraisal that has been undertaken. Where necessary I have highlighted these amendments in the report.

Policies Map

5. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, the Council is required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan. In this case, the submission policies map comprises the set of plans identified as Plans 1 to 9 and the series of plans in Appendix E.

6. The policies map is not defined in statute as a development plan document and so I do not have the power to recommend main modifications to it. However, a number of the published MMs to the Plan's policies require further corresponding changes to be made to the policies map.
7. These further changes to the policies map were published for consultation in the Schedule of Main Modifications to Local Plan Part 1 (September 2017).
8. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Council will need to update the adopted policies map to include all the changes proposed in the plan and the further changes published alongside the MMs.

Consultation

9. The Council undertook formal consultation over a 6 week period from 3 September to 17 October 2014 and published a paper entitled "Consultation on Potential Housing Scenarios and Other Issues". This covered the spatial strategy, Green Belt issues, and issues relating to Gypsies and Travellers, landscape protection and commercial land. It also provided an opportunity to comment on the LAA (Land Availability Assessment). Consultation was widespread and it is clear that, by using a range of consultation techniques, the Council aimed to reach as many people as possible. There was also an exhibition which attracted 1,792 visitors. People were able to give their views and respond to specific consultation questions; 4,265 responses were received. The Council's Consultation Statement of August 2016 sets out the approaches to consultation and how representations were taken into account. It is clear from the evidence that the consultation was adequate for the purposes of Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
10. The Consultation Statement Update of December 2016 explains the consultation that took place under Regulation 19 of the same Regulations, the main issues raised and how they were addressed.
11. Consultation has been extensive and meets the requirements of the Regulations and the Council's own Statement of Community Involvement.

Assessment of Duty to Co-operate

12. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on it by section 33A in respect of the Plan's preparation.
13. The Council has actively engaged with, or has been a member of, a number of bodies and organisations in order to consider important issues relevant to the Plan. These include the Thames Basin Heaths Special Protection Area Joint Strategic Partnership Board; East Hampshire District Council and Natural England; the County Council; several other district councils; town and parish councils; infrastructure providers; organisations representing Gypsies, Travellers and Travelling Showpeople; the Highways Authority, Network Rail, TfL and transport providers; and key organisations and agencies such as water companies, health providers, education, social services, adult social care, telecommunications companies and emergency services and others.

14. A number of Statements of Common Ground (SoCGs) had previously been prepared for the withdrawn Core Strategy, and more recent SoCGs have been agreed with Natural England and the Environment Agency in connection with the current plan.
15. Extensive collaboration has been carried out with the County Council and Guildford and Woking districts in the preparation of the SHMA (Strategic Housing Market Assessment) and in discussion on housing requirements. Whilst the submitted plan does not contain any allowance for unmet housing need arising in Woking District, this is a matter dealt with through modifications to the housing requirement and does not demonstrate any failure under the Duty to Co-operate.
16. Overall I am satisfied that, where necessary, the Council has engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the duty to co-operate has therefore been met.

Assessment of Soundness

Main Issues

17. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings, I have identified three main issues upon which the soundness of the Plan depends. These are: whether the plan makes adequate provision for housing; whether the spatial strategy is sound, including all its component parts; and whether the development management policies are sound. Under these headings, my report deals with the main matters of soundness rather than responding to every point raised by representors.

Issue 1: Whether the Plan makes adequate provision for new housing

Introduction

18. Policy ALH1 of the submitted plan makes provision for at least 9,861 net additional homes from 2013 to 2032, or 519 dwellings per annum (dpa). This figure was derived from work carried out for the West Surrey SHMA, which includes Waverley, Guildford and Woking. However, this housing requirement does not take account of the latest household projections, or respond adequately to market signals, unmet need in the HMA or the effect of London migration. **MM3** raises the housing requirement in Policy ALH1 to a minimum of 11,210 dwellings to take proper account of these factors, and the following sections explain the process by which the housing requirement has been calculated.

Calculating the OAN

19. The SHMA findings are based on the 2012 Household Projections which indicated a demographic need for 1,352 dpa across the HMA, of which 493 were apportioned to Waverley Borough. However, the 2014 CLG household projections, published in 2016, are meaningfully different from those of 2012 and indicate a lower demographically-based figure for Waverley of 378 dpa.

This becomes a starting point of 396 dpa after factoring in the SHMA-assessed vacancy rate of 4.7%¹.

20. The principal market signals relate to housing affordability. Waverley is the third most expensive local authority area in England outside London, based on the ratio of lower quartile workplace earnings in the Borough to lower quartile house prices ("the lower quartile affordability ratio").² The ratio in 2016 was an exceptionally high 15.54, compared with the national figure of 7.16. This figure also represented a significant increase compared with the ratio of 13.11 at the beginning of the plan period. Planning Practice Guidance (PPG) states that the more significant the affordability constraints, the larger the improvement in affordability needed and the larger the additional supply response. Planned supply should be increased by an amount that, on reasonable assumptions and consistent with the principles of sustainable development, could be expected to improve affordability.
21. The submitted plan's housing requirement of 519 dpa incorporates an uplift of about 5% based on the concept of returning suppressed household formation rates in the 25-34 age group to 2001 levels by 2033. However, such an uplift, based on a minor adjustment to household formation rates in one age group, is not capable of addressing the Borough's serious and worsening problem of housing affordability. Evidence derived from a paper produced by the Office for Budget Responsibility (OBR) entitled "Working Paper No. 6: Forecasting house prices", from the University of Reading's affordability model and more recent OBR forecasts on wages and house prices³ indicates that this adjustment would not in practice be sufficient to stabilise the growing problem and could lead to a lower quartile affordability ratio as high as 18.40 by the end of the plan period.
22. A number of evidence-based approaches to ascertaining the appropriate uplift were put forward at the Examination⁴. Of these, the OBR house price forecast / University of Reading model indicates that 635 dpa or an uplift of 28.8% to

¹ As agreed in the Statement of Common Ground between the Council and the Waverley Housing Forum (also signed by Protect Our Waverley / Joint Parish Councils). Different sources, such as the use of 2015 mid-year estimates and Council Tax sources for vacancy rates, give slightly lower, but not meaningfully different, figures. 396dpa is based on recognised and commonly used sources and is the most reliable evidence-based figure available to form the starting point for the OAN calculation.

² This ratio is preferred to the alternative ratio of residence-based earnings to house prices, which is influenced by commuting, and thus obscures the cost of house purchase for those working in the Borough. It is recognised that the Borough's housing stock profile has a higher proportion of large houses, but this does not lessen the need to address the acute affordability problem in the Borough.

³ See Matter 1 Appendices, and Briefing Note on OBR-based Affordability Modelling, Waverley Housing Forum

⁴ Including the OBR house price forecast and University of Reading model, national housing needs apportioned to Waverley, benchmarking of stock increases and benchmarking of market signals elsewhere: See Matter 1 Appendices, Waverley Housing Forum

the 2012 household projections for Waverley would be necessary to hold the affordability ratio constant. This cannot be taken as a precise figure as the model is not tied to a detailed analysis of the local market, the household projections have been updated and there are uncertainties over demand elasticity in relation to supply, but it is nonetheless a credible approach to modelling the relationship of supply to affordability. Of the other analyses, a weighted benchmarking of stock increases in different localities points to an uplift of just under 28%, whilst a benchmarking exercise comparing market signals uplifts in other local authorities indicates that these have ranged from 10% to 30%. The affordability situation in Waverley is one of the most severe outside London and all the analysis suggests that the uplift should be towards the upper end of that range, in the order of a 25% uplift from the starting point of 396 dpa. This would indicate an OAN of 495 dpa.

23. In respect of affordable housing need, the West Surrey SHMA identifies a need for 314 affordable dwellings per annum in Waverley. At a delivery rate of 30% affordable housing on eligible sites, a total of 1,047 dpa would be needed to meet affordable housing needs in full. This is a serious position which again serves to highlight the severity of housing unaffordability in the Borough. Owing to the limitations of site availability and the market, it would not be realistic to expect this level of housing delivery in Waverley. However, market signals, discussed above, point to an uplift to 495 dpa and this would go some way to accommodating affordable housing need.
24. The basket of forecasts points towards employment growth of 0.6% pa if the most anomalous projection is discounted.⁵ This is a little above the historic rate of jobs growth of 0.5% per annum and has a sense of realism about it. This amounts to a growth of 6,790 jobs across the plan period, or 399 jobs per annum. Evidence produced by the Council demonstrates that growth in excess of 400 jobs per annum would have been supported by the submitted plan's housing requirement of 519 dpa. On that basis, an OAN of 495 dpa would be capable of supporting the projected jobs growth of 399 jobs per annum. A lower housing figure would not be in tune with projected employment growth, whilst on the other hand the evidence does not point towards an employment-led housing uplift to 625 dpa as some have argued.

Conclusion on the OAN

25. Market signals support an uplift of 25% to the OAN starting point of 396 dpa to increase housing delivery. The resultant OAN of 495 dpa would stem the continual trend of worsening housing affordability, go some way to meeting the considerable need for affordable housing and would support projected employment growth.

⁵ The workforce jobs calculations are the most appropriate for the purposes of modelling employment growth and housing need as part of the calculation of OAN, as indicated in the relevant SoCG between the Council and the Waverley Housing Forum. The appropriate time period for forecasting is 2015-32, since a reduction in unemployment in 2013-15 indicates that the employment market appears already to have adjusted to the growth figures for those years. There are a number of employment forecasts, but one of them contains significant anomalies and should be discounted owing to the risk of skewing the figures.

Meeting unmet housing need in the HMA

26. The West Surrey HMA also includes Woking and Guildford Borough Councils. The SHMA calculates Woking's OAN to be 517 dpa, but Woking's adopted Core Strategy 2010-2027 only makes provision for 292 dpa over its plan period, leaving unmet housing need against the SHMA figure of 225 dpa, or 3,150 dwellings.⁶
27. The submitted Waverley Borough Local Plan makes no provision for Woking's unmet housing need. However, the NPPF states that local planning authorities should meet the objectively assessed need within their housing market areas. This requires cooperation between the authorities in the HMA to ensure that the need is met. Almost all the land outside Woking's built up area, and most of the land outside Guildford's built up area, is in the Green Belt. Waverley, even allowing for its Green Belt and AONB, and the European sites nearby, is significantly less constrained. Making no allowance in Waverley for Woking's unmet housing need is therefore not a sound position.
28. The underprovision exists now and has been growing from the start of Woking's plan period; it needs to be addressed. It is true that any future review of Woking's local plan will provide an opportunity to re-examine housing opportunities and adjust its assessment of unmet need against a new OAN calculation⁷, but it is very clear from Woking Borough Council's evidence to the hearing and from the obvious constraints imposed by the ring of Green Belt around Woking, that there remains a significant delivery shortfall against housing needs in Woking, and that the town will very probably remain unable to accommodate a significant proportion of its OAN in future.
29. That said, Waverley should not be expected to accommodate the full amount of Woking's unmet need indicated by the SHMA figures. The 2014 household projections for Woking were lower than those on which the SHMA were based⁸, and although the adjustment was less significant in percentage and numerical terms than at Waverley, the figures suggest that the scale of the underprovision could be less than 225 dpa. It is also possible that Woking might be able to deliver more housing than envisaged by its plan because, although there is still a running shortfall from the start of its plan period, housing delivery in 2013-14, 2015-16 and 2016-17 was ahead of the Core Strategy housing requirement. Moreover, Guildford is going through the plan preparation process, and the potential for Guildford to meet a proportion of

⁶ The Woking Core Strategy Inspector did not have the benefit of the 2015 SHMA, but his report recognised that the Core Strategy would not meet the full objectively assessed needs for either market or affordable housing in the Woking element of the housing market area.

⁷ Re-calculating Woking's OAN in the light of the 2014 household projections is outside the scope of this examination. The SHMA figure has therefore been referred to but with a recognition that lower household projections may result in some reduction to the degree of unmet need.

⁸ Waverley Responses Appendix 1: G L Hearn

Woking's unmet housing need will need to be tested through its own local plan examination. It would therefore be appropriate and reasonable for Waverley to accommodate half of the figure for unmet need identified through the SHMA process. The relevant figure annualised over Waverley's plan period amounts to 83 dpa⁹, which would need to be added to the OAN of 495 dpa.

30. Finally there is the issue of migration from London. There is a very specific reason why this needs to be considered in the case of Waverley. This is referred to in paragraph 2.55 of the SHMA: there is unusually close interconnectivity between the authorities in this HMA and London, and paragraph 4.68 recognises an important interaction in the demographic projections. The SHMA has undertaken a sensitivity test to examine the effects of different assumptions in respect of London migration. It is therefore a local consideration that needs to be taken into account in this particular instance. Net migration from London fell during the recession from 2008, and the SHMA work examined the potential effects of a partial rebound to pre-recession levels.¹⁰ Translating this into households and dwellings, the effect on Waverley was quantified as 12 dpa. The economy, the housing market and indeed the affordability indices in the HMA have all seen significant growth since the recession and it is reasonable to consider that there has been some resumption of the trend. Whilst recognising that the precise level of the continuing trend is uncertain, the figure of 12 dpa, based on only a partial rebound of pre-recessionary net flows, is a cautious approach and should be taken into account.
31. Taking the OAN of 495 dpa and adding 83 dpa to allow for Woking's unmet need and 12 dpa to allow for the effect of migration from London arising from unmet need would point to an overall housing provision of a minimum of 11,210 dwellings, or 590 dpa.

Housing provision in relation to environmental issues

32. Concerns were understandably put forward during the examination about the environmental capacity of the Borough, raising the question as to whether the Borough is capable of accommodating the identified amount of housing during the plan period without significant harm to the Green Belt or to key landscape or environmental objectives.
33. The issue of Green Belt is dealt with below under the heading of the Spatial Strategy. The plan proposes that land is released from the Green Belt at Godalming, Milford, Witley, Elstead and Chiddingfold. The amount of land is relatively modest and this report concludes that the release of each of those

⁹ Taking half of Woking's annualised unmet need of 225 dpa results in an annualised figure for Waverley of 83 dpa, because the Waverley Borough Local Plan has a later termination date.

¹⁰ See SHLAA paragraphs 4.67 to 4.78. Migration from London in the pre-2008 period was 337 persons per average higher than the 5 year period feeding into the 2012 based population projections. The sensitivity test considered an adjustment to a level which was half of this difference.

sites would not have a substantial effect on the function of the wider Green Belt and that strong new Green Belt boundaries could be established.

34. The matter of European protected sites is addressed below in connection with the Spatial Strategy, and in relation to Farnham, Haslemere and Dunsfold Aerodrome. The plan would have no effect on the integrity of any of the European protected sites. There are enough potential solutions to give confidence that SANG will be identified and provided to support the additional dwellings in Farnham and it is not necessary to identify a strategic SANG site for Local Plan Part 1.
35. The role of Dunsfold Aerodrome is also considered in relation to the Spatial Strategy; it is evident that the strategic allocation enables a significant amount of development to be accommodated on brownfield land, reducing the need to find further SANG or greenfield sites. It also reduces the need to find further SANG should the re-distribution of housing allocations result in higher numbers for settlements within 5km of the Thames Basin Heaths SPA, such as Farnham.
36. The strategic site allocations in this plan do not have a significant effect on valued landscapes or important biodiversity habitats. Whilst it will be necessary to allocate further greenfield sites in Local Plan Part 2, the plan contains a range of strong landscape and environmental protection policies – discussed later in this report under the section on development management policies – which are capable of ensuring that valued landscapes, including AONB, AGLV and other designations, are protected.
37. The highways impact of the plan has been evaluated and the Waverley Strategic Highway Assessment Report (Surrey County Council) indicates that, with mitigation, the impact of the Local Plan is not considered severe. Additional sites will be required to meet the modified housing figure in MM3 but Policy ST1: Sustainable Transport contains a range of requirements to ensure that transport infrastructure improvements are put in place to mitigate development impacts. Highways England has not identified any particular areas of concern and both Waverley and Guildford Local Plans have been progressed on the basis that the A3 Guildford improvement scheme is unlikely to commence before 2024. The impact of the Dunsfold Aerodrome allocation is discussed below in respect of the Spatial Strategy; transport mitigation measures are clearly required, but they have been thoroughly evaluated, and they can be planned for and funded by the development in a phased manner. There is no indication that the plan strategy would cause significant harm to air quality or generate undue additional noise.
38. The Local Plan includes a range of policies designed to secure that the development and use of land contribute to the mitigation of, and adaptation to, climate change. Of particular relevance in this respect are Policy SP2: Spatial Strategy; Policy ST1: Sustainable Transport; Policy TCS1: Town Centres; Policies CC1 to CC4 relating to climate change, sustainable construction and design, renewable energy development and flood risk management; and the requirements of the strategic site policies SS1 to SS9.
39. In conclusion, whilst recognising the Borough's planning, landscape and environmental designations, and concerns about traffic, there is no convincing

evidence that 11,210 dwellings over the plan period, or 590 dpa, cannot be delivered in a sustainable manner. The SA tested a range of options and stated at paragraph 6.3.4 that there were no "show stoppers" to delivery. The SA addendum, which looked at three options for accommodating the additional growth, commented that none of the options was likely to generate significant negative effects over and above the effects identified in relation to the submitted plan. It will clearly be necessary to allocate greenfield sites to accommodate the housing requirement, but the plan's policies enable the Council to exercise strong control over the impact of new development. Consequently, none of the evidence suggests the need for a policy intervention on environmental grounds to reduce the housing figure below the identified requirement of 11,210 dwellings over the plan period.

The housing requirement

40. Having regard to all the above, Waverley's housing requirement as set out in policy ALH1 as modified by **MM3**, **is a minimum of 11,210 dwellings, or 590 dpa**, over the 19 year plan period from 2013 to 2032. This represents an increase of 1,349 dwellings, or 71 dpa, over the housing requirement in the submitted plan. The figure is soundly-based.
41. Policy ALH1 apportions the housing requirement to the various settlements in the settlement hierarchy, and **MM3** modifies these figures to meet the requirement of a minimum of 11,210 dwellings. MM3 also includes consequential changes to Objective 2, the explanatory text, and Appendix F. The housing requirement set out in MM3 accurately reflects the calculation set out in the various stages described above. It is in accordance with the NPPF and with the PPG, and is sound.
42. The apportionment of housing to the different towns and villages, and the MM3 adjustments in this regard, are discussed later under Issue 2, which deals with the spatial strategy.

The housing trajectory

43. Strategic sites for housing are identified at Coxbridge Farm, Farnham (Policy SS1); Land West of Green Lane, Badshot Lea, Farnham (Policy SS2); The Woolmead, Farnham (Policy SS3); land at Horsham Road, Cranleigh (Policy SS4); land south of Elmbridge Road and the High Street, Cranleigh (Policy SS5); land opposite Milford Golf Course, Milford (Policy SS6); Dunsfold Aerodrome (Policy SS7); and Woodside Park, Godalming (Policy SS8).¹¹ In the interests of clarity and to ensure the plan is up to date, **MM17** updates paragraph 18.2 and table 18.1 to set out the total number of dwellings that are expected to be delivered from these sites, together with the number of permissions and the expected delivery in the next 5 years.
44. The choice of sites reflects a balanced approach consistent with the spatial strategy, being located at the main towns of Farnham, Godalming and Cranleigh, together with Milford, which is a large village near Godalming, and

¹¹ There is also a Strategic Employment Site on land off Water Lane, Farnham.

on brownfield land at Dunsfold Aerodrome. This is discussed in more detail in Issue 2. Owing to landscape and environmental constraints, a large strategic site has not been proposed at Haslemere.

45. **MM4** contains an updated housing trajectory in the interests of clarity. The assumptions regarding delivery rates at Dunsfold Aerodrome both over the plan period and in the first 5 years are reasonable and are discussed in more detail in relation to the spatial strategy.
46. Other elements of the Council's housing trajectory and 5 year housing land supply are based on reasonable assumptions, and indeed the Council's approach is somewhat pessimistic in respect of small sites with planning permission, for which it has applied a 10% lapse rate. Whilst a proportion of such sites in the past may not have come forward, there is no requirement in the NPPF to apply a blanket discount of this scale; sites with planning permission should be considered deliverable unless there is clear evidence that schemes will not be implemented within 5 years. The application of this discount may therefore lead to an unnecessarily pessimistic assessment of the 5 year supply position. As regards the larger sites with planning permission, the Council's assessment is based on real information from the site developers and on the evidence set out in the Housing Land Supply and Housing Trajectory Contextual Note, so there is no reason to factor in a lapse rate. The latest trajectory for sites with resolutions to grant permission and for strategic allocations reflects new information from developers and details of a current planning application. Farnham Neighbourhood Plan allocations are separately enumerated and LAA sites within settlements now include the contribution from Aaron's Hill arising from MM12. The assumptions regarding small and large windfalls are based on past rates of delivery, the latter discounted by 15%. The Council's approach to all these elements is realistic and reasonable.
47. The plan is strategic and does not itself aim to allocate a full range of sites to meet the housing requirement. Having regard to the estimated contributions from all sources, sites for some 1,525 dwellings¹² need to be allocated in Local Plan Part 2 "Site Allocations and Development Management Policies", and in neighbourhood plans. The Council intends to bring forward Local Plan Part 2 quickly; Annex 1 of the Council's LDS indicates that it is due to be published in June 2018 with adoption in April 2019¹³. Its early adoption in accordance with this timetable, and a positive approach to site identification, are critical to meeting the housing requirement. There is every indication that the Council will adhere to the projected timetable.
48. Part 2 of the Local Plan is therefore an essential element of the Council's housing delivery strategy. However, if it were only to allocate smaller sites, as described by the submitted plan, it would be too inflexible to enable the housing requirement to be met and there would be a significant impediment to

¹² According to the latest trajectory, September 2017. This is the row in the trajectory for 'LAA outside settlements and other allocations in NPs and LPP2'. This figure does not make any allowance for 'LAA within settlements', some of which may also need to be allocated.

¹³ These timescales may need to be reviewed given the Council's desire to adopt Local Plan Part 1 before consulting on the preferred options for Local Plan Part 2.

delivery. **MM1** therefore includes a range of changes to the text to remove the reference to smaller sites and to make it clear that Part 2 of the plan provides the potential to allocate sites of any size. This is necessary in order to clarify the role of Part 2 and to assist with the delivery of the increased housing requirement established by MM3.

49. There are enough indications to be confident that the housing requirement will be delivered over the plan period, with the assistance of Part 2 and neighbourhood plans. A large number of possible housing sites have been submitted for the Council's consideration. With the provisions of the submitted plan, as modified, and with the realistic prospect of adequate allocations in Part 2 of the Plan, the housing requirement of a minimum of 590 dpa set out in MM3 is capable of being delivered over the plan period.
50. The trajectory also indicates that there is a sufficient supply of specific deliverable sites to provide 5 years' supply of housing against the housing requirement.¹⁴ The favourable conditions for development at Dunsfold Aerodrome are discussed later in relation to the spatial strategy and the contribution expected from this source within the first 5 years is realistic and modest. This conclusion is not dependent on the outcome of the current planning application. The trajectory in respect of other sources of supply is discussed above and is realistic.
51. There are a number of sites identified in the Land Availability Assessment (LAA) which the Council counts towards the 5 year housing land supply. In respect of those within the urban areas, the Council has taken a reasonable approach toward its numerical contribution by identifying a small selection of the more eligible sites from a larger pool. Those outside urban areas will come forward through Part 2 of the Plan or through neighbourhood plans.¹⁵ It is reasonable to assume that some of the LAA sites are capable of making a contribution to the 5 year housing land supply. Overall the evidence supports the Council's position that the 5 year supply position at 1 April 2017 was 4,464 dwellings.¹⁶
52. It is necessary at this point to refer to the methodology of the 5 year housing land supply calculation, to ensure that land comes forward in a controlled manner during the life of the plan through appropriate allocations as an integral part of the plan-led system. The SoCG agrees that the "Sedgefield" method should be used, which spreads the backlog arising during the first four years of the plan over the following 5 years. As regards the "buffer" brought

¹⁴ Evidence relating to the 5 year supply is set out in the relevant SoCG between the Waverley Housing Forum and the Council, the Council's 5 Year Housing Land Supply statement of 1 April 2017 and the Waverley Housing Forum's Matter 4 statement and appendices.

¹⁵ The Inspector in the Longdene House appeal (APP/R3650/W/16/3165974) discounted them from the 5 year housing land supply calculation, but it is necessary to take a much wider view in development plan making.

¹⁶ Appendix C: Housing Trajectory 2013-2032, Schedule of Proposed Main Modifications.

forward from later in the plan period¹⁷, it is the conclusion of this report that this must be set at 5%, and that this should be used as the basis for planning decision-making going forward.

53. The primary reason is that this is a new plan and it re-sets the trajectory and supply position. A small number of appeal decisions issued before the publication of this report have calculated the 5 year supply on the basis of a 20% buffer on the grounds of persistent under-delivery, such as the Longdene House appeal (APP/R3650/W/16/3165974). However, the PPG recognises that S78 appeals cannot consider the whole plan-making picture. In the particular case of Waverley, a 20% buffer imposed along with the Sedgefield methodology, by raising the housing requirement over the first 5 years, would not adequately recognise the timing of Dunsfold Aerodrome and the role and timing of Part 2 of the Local Plan and neighbourhood plans, leading to a potential 5 year supply deficit. The new plan represents a change of circumstances from that which existed at the time of the Longdene House appeal decision, and the other appeal decisions that came to similar conclusions.
54. There has not, in any case, been a long term record of persistent under-delivery in Waverley such as to suggest a 20% buffer. The PPG states that the assessment of a local delivery record is likely to be more robust if a longer term view is taken, since this is likely to take account of the peaks and troughs of the housing market cycle. It is clear from Appendix 1 of the Council's 5 Year Housing Supply Statement of 1 April 2017 that, prior to the recession, completions in Waverley were running ahead of the planned requirement so, taking a long term view, a 5% buffer is justified.
55. There is therefore no convincing case for bringing a further 20% forward from later in the plan period. It is essential to recognise the 5% buffer as a necessary element of the sound management of housing supply over the plan period, through the plan-led system.
56. **MM4** updates various parts of the explanatory text and Appendix C of the plan to provide the latest housing supply position and housing trajectory. A housing requirement of at least 11,210 dwellings, or 590 dpa, would result in a basic 5 year requirement of 2,950 dwellings. On 1 April 2017 figures, there had been 1,048 completions over the first 4 years of the plan against a requirement of 2,360 (4 x 590), a shortfall of 1,312 dwellings, which in accordance with the Sedgefield methodology would be added to the 5 year requirement, giving a figure of 4,262. Applying a 5% buffer results in a 5 year requirement of 4,475 dwellings, or 895 dpa. The supply position for at 1 April 2017 was 4,464 dwellings but the trajectory shows an improving supply position through 2017-18 with 5.2 years' supply at 1 April 2018.¹⁸ Moreover, as discussed above, the Council's application of a 10% lapse rate to small sites with planning permission has unnecessarily depressed its estimate of the supply position. Taking these points into account, the evidence points clearly to a 5 year

¹⁷ See paragraph 47 of the NPPF

¹⁸ Appendix C: Housing Trajectory 2013-2032, Schedule of Proposed Main Modifications.

housing land supply at the time of writing. It is not therefore necessary to identify further sites in Local Plan Part 1.

57. However, the risks to supply – for example of variations in the start date and delivery rate at Dunsfold Aerodrome, or unforeseen impediments in bringing other sites forward – point strongly to the need for the Council to adopt a positive approach towards housing provision and to bring forward Part 2 of the Plan and encourage neighbourhood plans to identify sites as early as possible.

Affordable housing on development sites

58. Policy AHN1: Affordable Housing on Development Sites requires a minimum provision of 30% affordable housing in housing developments over certain thresholds. However, the policy as set out in the submitted plan allows Part 2 of the Local Plan, and neighbourhood plans, to vary the percentage of affordable housing on their allocated sites without setting out the circumstances under which this could happen. This is unsound because the level of affordable housing need in the borough is serious and its adequate provision is consequently a strategic matter; this part of the policy would leave doubt as to whether that provision could be achieved, and developers would be faced with uncertainty as to the amount of affordable housing expected on each site. **MM6** deletes the reference to the variation and also clarifies the text in respect of commuted payments in lieu of affordable housing provision on small sites in rural areas. Subject to MM6, the policy is sound.

Gypsies, Travellers and Travelling Showpeople

59. Policy ANH4: Gypsies, Travellers and Travelling Showpeople Accommodation indicates that provision shall be made for such groups in accordance with the Waverley Gypsy and Traveller Accommodation Assessment (GTAA). The latest version of this was published in June 2017. The Council's consultants sought to identify all sites and encampments in the study area and attempted to complete an interview during the non-travelling season with the residents on all occupied pitches and plots. They also gave the opportunity to households in bricks and mortar accommodation to engage in the process, and they engaged with seven nearby local authorities to understand the wider issues in the area. The assessment takes into account the guidance in Planning Policy for Traveller Sites (2015). The GTAA is a comprehensive piece of work and is soundly based. It concluded that there is a need for 27 additional pitches for households that meet the planning definition and up to 24 additional pitches for unknown households that were unable to be interviewed.
60. The GTAA considered that there was a need for two additional plots for travelling showpeople. The specific issue of the group of travelling showpeople who are claiming local connections in Cranleigh is appropriately addressed in the GTAA: at the time of publication in June 2017, work was ongoing to identify where these households are currently residing and whether their needs have been included in GTAA studies elsewhere. The outcome of this work may or may not require a revision to the GTAA to reflect the plot requirements for travelling showpeople in Waverley, but does not affect the wording of Policy ANH4 itself. The level of need will be monitored as set out in Appendix F of the Plan.

61. Policy ANH4 indicates that specific sites to meet the identified need for Gypsies, Travellers and Travelling Showpeople will be allocated in Part 2 of the Local Plan. In the particular circumstances of Waverley, this is a sound approach because Part 2, which will be the main vehicle for making site allocations, will follow very shortly after Local Plan Part 1. **MM7** allows for rural exception sites for Gypsies, Travellers and Travelling Showpeople, which will be considered in accordance with the PPTS. It also removes from Policy ANH4 in the submitted plan the requirement for proposals to meet an assessment of need, to ensure that the policy is consistent with the Plan's approach to other housing. This will allow sites to be brought forward without having to demonstrate need, providing they meet criteria relating to highway safety, essential services, access to local facilities and character and appearance. Subject to MM7 the policy is sound.

Mix of housing types to meet different needs

62. Based on projected demographic changes and the evidence in the SHMA, certain groups are considered to have particular housing needs; these are older people, families with children and people with disabilities. Policy AHN3 is a positively-worded policy that addresses the needs of these groups and is sound. The plan takes a non-prescriptive approach towards the size of homes and Policy ANH3 indicates that the range of different types and sizes of home in each case will reflect the most up to date evidence in the SHMA. The needs of those seeking custom and self-build homes has also been considered by the Council, which is maintaining a register of those who are interested in meeting their housing needs in this way in order to gain evidence of need. The plan's approach is sound in all these respects.

Conclusion

63. Subject to the MMs described above, the plan makes adequate provision for new housing and creates an adequate framework for the maintenance of a 5 year housing land supply.

Issue 2: Whether the spatial strategy is sound, including all its component parts.

Overview of the spatial strategy

64. Waverley is an elongated borough with rather discrete towns and villages, and there is a great deal of local interest in how new development should be distributed between them. Policy SP2 sets out the components of the spatial strategy, which governs both the distribution of strategic sites in the current plan and sites yet to be identified through Local Plan Part 2, neighbourhood plans and planning permissions. It aims to protect land of the highest amenity value, to safeguard the Green Belt, and to focus development at the four main settlements of Farnham, Godalming, Haslemere and Cranleigh, with moderate levels of development at the larger villages of Chiddingfold, Elstead, Milford and Witley, and limited amounts in smaller settlements. It also aims to maximise opportunities for the redevelopment of suitable brownfield sites for

housing, business or mixed use, an objective that lends support to the proposed allocation of 2,600 dwellings at Dunsfold Aerodrome. In dealing with an appeal for development on this site in 2008, both the Inspector and the Secretary of State considered that the aerodrome constituted brownfield land.

65. Focusing new development on the four main settlements is a sound approach and is in the interests of sustainable development, since most of the social, educational, employment and other facilities are there, and the larger villages also have a role in the strategy to meet housing and other needs and to support village facilities. As regards Dunsfold Aerodrome, the aim of re-using land that has previously been developed is one of the NPPF's core planning principles, and the approach that has been taken is in line with the concept of new settlements set out in paragraph 52 of the NPPF.
66. Policy ALH1 assigns numbers of new homes to the Borough's towns and villages and to Dunsfold Aerodrome in accordance with the settlement hierarchy, and **MM3** increases the number in order to meet the uplifted housing requirement described in Issue 1. The additional growth has been distributed among the settlements on a pro-rata basis but is partially adjusted to take into account constraints and opportunities in the different areas of the Borough. This reflects the preferred option in the HRA Addendum.¹⁹ Dunsfold Aerodrome was omitted from the pro-rata increase because the figure of 2,600 dwellings at that site was based on a realistic and achievable rate of delivery from the site over the plan period. Any allocation higher than 2,600 would carry a risk that the housing requirement would not be met over the plan period. Delivery rates from that allocation are discussed under the heading of Dunsfold Aerodrome below.
67. **MM2** modifies Policy SP2 to make it clear that major development is to be avoided on land of the highest landscape value, which is to accord with NPPF paragraph 115; to clarify that Bramley has limited scope for development and remains washed over by the Green Belt; to indicate that Local Plan Part 2 and neighbourhood plans will identify other housing sites, not just non-strategic sites, to be consistent with MM1; and to make consequential changes to the supporting text. These modifications are all required for clarity or consistency and are necessary to make the plan sound.

Spatial strategy: implications for European protected sites

68. The effect of the distribution of development was assessed by the HRA (July 2016) and appropriate assessment carried out for each of the 5 European sites in the Borough. The conclusion was that the plan would have no adverse effect on the integrity of any of the European sites. The issue of SANG (Suitable Alternative Natural Greenspace) in relation to the Thames Basin Heaths Special Protection Area (SPA) is discussed below in relation to Farnham and Policy NE3. The HRA Addendum considered the effects of the additional development from MM3: more dwellings would be located within 9km of Wealden Heaths Phase I SPA and Wealden Heaths Phase II SPA, but the overall amount of development within both 400m and 9km of both SPAs is

¹⁹ Option 3, HRA Addendum.

much less than at Thames Basin Heaths SPA and Natural England has previously recommended that the Council undertake HRA on all major developments located within 5km of Wealden Heaths Phase II SPA. This is reflected in paragraph 16.28 of the Plan's explanatory text and the approach is sound.

69. It is also necessary to comment on the relationship of the spatial strategy and the issue of air quality and nitrogen deposition within SACs (Special Areas of Conservation) following the Wealden judgment.²⁰ The Council's consultants have undertaken additional work to ascertain the impact of the housing uplift arising from MM3. The only road materially affected is the B3001 Milford Road. The contribution would rise from 0.07 kgN/ha/yr to 0.08 kgN/ha/yr, which would still result in no 'in combination' exceedance of the critical level for traffic levels on the B3001. This is a negligible change and would still mean that a large net in-combination improvement is forecast overall for the Borough. The soundness of the plan is unaffected.

Spatial strategy: implications for the Green Belt

70. The Government attaches great importance to the Green Belts. Their essential characteristics are openness and permanence. Once established, their boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.
71. As previously discussed, there is a pressing need for housing in Waverley, and a serious issue of housing affordability. Delivering the housing to meet the needs of present and future generations is a key aspect of the social dimension of sustainable development. The Council has acknowledged that it is not possible to meet identified housing need solely within its towns and villages and has recognised that the implementation of a sustainable spatial strategy will require a proportion of development to be located on greenfield sites outside the main towns and larger villages, some of which fall within the Green Belt. The Council therefore commissioned a Green Belt Review, which was published in two parts in August 2014.
72. The Green Belt Review contained an analysis of a wide spread of land parcels and their contribution to the purposes of including land in the Green Belt. This provided the evidence base for considering whether some land could be released from the Green Belt to accommodate much needed housing without significantly compromising the characteristics or purposes of the Green Belt. The review was a comprehensive and well-judged piece of work that carries considerable weight. The Council's Topic Paper of December 2016 explains the approach taken towards the selection of sites for release from the Green Belt in the light of the recommendations of the Green Belt Review.
73. At the strategic level, the need to provide adequate housing through the spatial strategy would lead to difficulties at Godalming unless some land was released from the Green Belt. The supply of sites within the town and on

²⁰ Wealden District Council v. Secretary of State for Communities and Local Government, Lewes District Council and South Downs National Park Authority [2017] EWHC 351 (Admin)

brownfield land is limited by the town's character and topography, and the town is surrounded by Green Belt. Godalming is one of the largest towns in the Borough and it would not be possible to provide adequately for the amount of growth commensurate with the spatial strategy without releasing some land from the Green Belt. The plan therefore includes the release of two sites; the details of these are addressed under the heading of Godalming below.

74. In addition, the larger villages of Chiddingfold, Elstead, Milford and Witley are washed over by the Green Belt. Paragraph 86 of the NPPF indicates that villages should be included in the Green Belt if they have an open character that makes an important contribution to openness of the Green Belt and it is necessary to prevent development in them. However, the four villages do not have these characteristics; they are relatively large and, being washed over by the Green Belt, they are prevented from accommodating modest development which would not compromise the openness of the Green Belt. The plan therefore proposes the release of these villages from the Green Belt, together with some areas of additional land, including land opposite Milford Golf Course and some other modest areas adjacent to the villages, the precise boundaries of which would be defined by Local Plan Part 2. The details of these are addressed under the relevant village headings below.
75. The areas of land to be released from the Green Belt in the submitted plan as modified are sufficient to cater for housing needs over the plan period and no further land will need to be released from the Green Belt in Local Plan Part 2. There is a pressing need for new housing which should be delivered in accordance with the spatial strategy and sustainability objectives of the plan, and this need is such that the selective release of limited areas of land from the Green Belt, in the areas chosen, is justified and would not fundamentally undermine the purposes served by the Green Belt. The detailed changes are dealt with below under the relevant sections on Godalming and the villages, but considered strategically, these changes are justified by exceptional circumstances.
76. The submitted plan's proposals to include new land in the Green Belt north of Cranleigh and north east of Farnham around Compton to the Green Belt are not justified by exceptional circumstances and are dealt with under the sections on Cranleigh and Farnham respectively.

The importance of Dunsfold Aerodrome to the overall spatial strategy and to housing delivery

77. As part of the background work leading to the spatial strategy, the SA examined seven "reasonable spatial strategy alternatives". A scenario with no development at Dunsfold Aerodrome was assessed, along with various options with different levels of housing and different amounts of development. The chosen option with 2,600 dwellings at Dunsfold Aerodrome performed best overall, and best on a number of criteria including biodiversity, community and wellbeing, heritage, landscape and soils. It was not the best performer on housing, partly because it did not cater for some of the unmet housing need from Woking (remedied by MM3) and partly because it would not concentrate all housing development at the main settlements. Nevertheless, it is clear from the evidence that a large housing allocation at Dunsfold Aerodrome is a much

better and more sustainable option than a smaller allocation or no allocation at all on the site, for a number of reasons.

78. Firstly, without a substantial allocation at Dunsfold Aerodrome, more greenfield housing sites would need to be identified, especially at the main towns. A number of potential sites have been promoted by developers, but at the hearings no developer claimed that, individually or in combination, these would be capable of providing enough dwellings to obviate the need for a large housing allocation at Dunsfold Aerodrome. The Dunsfold Aerodrome allocation is therefore essential not only to relieve pressure on greenfield land but to ensure the delivery of sufficient housing to meet Waverley's needs.
79. Secondly, it is necessary to consider the potential impact on the Green Belt. The submitted plan, as modified, only requires moderate releases from the Green Belt. Without a substantial allocation at Dunsfold Aerodrome, further changes to the Green Belt boundary could be needed, for example in the vicinity of Godalming and the villages which are closely confined by Green Belt.
80. Thirdly, the effect on the landscape should be considered. Allocating more housing closer to the main towns instead of Dunsfold Aerodrome would require additional development within the landscape settings of Farnham and Haslemere. The AONB is a nationally important designation; the AGLV is a valued landscape and is due to be reviewed with the aim of incorporating parts into the AONB, and parts of Farnham have a historic landscape setting. Dunsfold Aerodrome on the other hand is a flat site with no landscape designation. From most areas it is surprisingly well hidden, and development of an appropriate scale would have little impact on the landscape. An appropriate amount of structural landscaping within the development, as indicated on the masterplan (see below) would enable the development to be reasonably integrated into the landscape so that it would not appear intrusive from the AONB to the north. **MM22** adds to Policy SS7 to ensure that the setting of the AONB is protected.
81. Fourthly, there is the potential effect on the natural environment. Substantial parts of the Borough, particularly around Farnham and Haslemere, are close to SPAs and additional allocations here would increase the need to provide SANGs. A large allocation at Dunsfold Aerodrome could be delivered such that the new housing would lie entirely outside the Wealden Heaths Phase 1 SPA 9 kilometre zone and the Wealden Heaths Phase II SPA 5 kilometre zone.²¹
82. Turning to transport issues, the SA pointed out that there is no existing bus service to Dunsfold Aerodrome, and it is some distance from a railway station. However, **MM22** addresses the absence of a bus service by requiring a frequent service to be provided and secured in perpetuity to serve the whole site. The absence of a nearby railway station means that Dunsfold Aerodrome has a more restricted range of transport choices than Farnham and Godalming, but railway journeys account for a relatively small proportion of

²¹ HRA August 2016, paragraph 6.7.4

daily transport trips even in well-connected places like Farnham, where only 10% of journeys to work and only 4% of journeys overall are by that mode.

83. The SA also indicated that vehicle mileage distances would be greater than with a non-Dunsfold Aerodrome option, but the difference would not be as much as might be expected. Part 4 of the TA (June 2016) quantified the difference between Dunsfold Aerodrome and non-Dunsfold Aerodrome options at between 1.7% and 8%.²² It is significant that the site is already the largest employment location in the Borough and provides a range of employment types, and it would have sufficient critical mass to support a primary school and local services, all of which would suggest that a reasonable proportion of trips would be internal to the site. A non-Dunsfold Aerodrome option would require the development of more urban-edge greenfield sites some distance from the town centres, which would tend to encourage car use.
84. Dunsfold Aerodrome is also well-related by road to the major employment, social and retail facilities at Guildford and Horsham. Distances to the nearest large town and station are not dissimilar to those of some proposed new garden villages including Long Marston, Oxfordshire Cotswolds and Deenethorpe.
85. The total volume of trips estimated for the Dunsfold Aerodrome allocation and the likely distribution of traffic have been the subject of technical studies by Surrey County Council (Strategic Highway Assessment, August 2016), and the TA (Mott MacDonald Stage 2 Report, February 2016) and provide a robust evidence base for an assessment of the traffic impact of the allocation. The Council also commissioned two reports from Mott Macdonald on current HGV flows from the site and the impact of the allocation in this respect. The transport strategy is to focus traffic from the site on to the A281 via a new link road, and this, and other transport infrastructure schemes, are set out in the Infrastructure Delivery Plan. Among these are contributions to mitigate the traffic impact on the southern approaches to Guildford and the local road network in Horsham. The SA has not raised any significant issues for the Dunsfold Aerodrome allocation in respect of noise and air quality. Policy SS7 seeks highway improvements and **MM22** adds to this policy to require mitigation for cumulative impacts and to ensure the safe operation and performance of the surrounding road network. This is necessary for soundness.
86. Whilst transport mitigation measures are clearly required in respect of the Dunsfold Aerodrome allocation, they have been thoroughly evaluated, and they can be planned for and funded by the development in a phased manner: for example, the bus service, list of highway measures largely centred on the A281 and the cross-boundary mitigation referred to above. For non-Dunsfold Aerodrome options, however, such comprehensive measures would be more difficult to achieve; the impact would be spread over the wider transport network and it would be more difficult to identify and fund the necessary

²² The difference in annual mileage between TA Option 1, a non-Dunsfold Aerodrome option and TA Option 3, an option similar to the chosen spatial strategy. The two percentage figures relate to 20% and 10% internalisation of trips respectively.

infrastructure improvements. There would also be an additional impact on Farnham and Godalming, towns with small traditional centres that are already affected by heavy traffic.

87. The strategic site allocation at Dunsfold Aerodrome is therefore a key contributor to housing delivery. Some very large housing allocations in other authorities have taken a considerable amount of time to make initial progress. But both the lead-in time and the planning approval period at Dunsfold Aerodrome are likely to be shorter than average, because a proposed development here has been in preparation over many years, infrastructure has been planned for and much detailed design has been carried out. Whilst there are acknowledged transport and other infrastructure issues to address, these are capable of being dealt with through planning conditions and obligations and there is no convincing evidence that they will result in significant delay. The site is flat and easy to build, and is in the ownership of one party who is experienced in developing and managing major projects. A delivery strategy involving housebuilders is in place, together with an indicative phasing plan, and planning obligations have been the subject of discussion with the local planning authority.
88. The Dunsfold Aerodrome Delivery Rates Assessment shows Dunsfold Aerodrome as starting to contribute towards delivery in 2019-20. It would have an average build out rate of 200 dpa over the lifetime of the development and would make a full contribution of 257 dpa from 2022-23, involving 4 housebuilders and delivering 30% affordable housing. The rate would fall away again between 2030 and 2032. Against the favourable background of land ownership, site characteristics and extensive preparation, this projected build out rate appears realistic and is analogous to Cambourne in South Cambridgeshire where delivery averaged 235 dpa over the build out period with a peak of 400 dpa.
89. The anticipated start date however appears tight and it is possible, depending on its outcome, that the decision on the called-in hybrid planning application for 1800 dwellings at Dunsfold Park (Council's ref WA/2015/2395) will affect that date. Nonetheless, whatever the decision on that application, which will be dealt with on its own merits, the development potential and deliverability of the Dunsfold Aerodrome allocation are favourable enough to provide some confidence that the site is capable of delivering a modest contribution of 273 dwellings to 2021-22, a figure established by the Council in consultation with the landowners, and will achieve its full expected contribution to the housing requirement over the plan period. There is no strong evidence that there are, for example, infrastructure issues that are so difficult to resolve that the site could not make the contribution expected by the Council. The implications of the risk to supply are dealt with in the preceding issue at paragraph 57.
90. Policy SS7 sets out an extensive list of requirements for the site including up to 2,600 dwellings, an expanded business park with around 26,000 sq metres of new employment floorspace, a local centre and schools and other social infrastructure, a country park, and other facilities. **MM22** adds requirements to the policy to recognise the significance of the heritage value of the site and protect the setting of the nearby Surrey Hills AONB, and re-phrases the housing requirement to "about" 2,600 homes to allow for some flexibility. It also amends the policy to ensure that necessary highways improvements take

into account cumulative impacts; a list of highway and transport schemes has been developed with Surrey County Council to mitigate the impact of the development and to address the issues raised in the TA. The bus service required by MM22, along with the provision of cycling and walking routes within the site, referred to below, will ensure that there are adequate opportunities to use non-car modes of transport. With the modifications contained in MM22, the policy is sound.

91. The PPG states that local planning authorities should secure design quality through the policies adopted in their local plans, and it contains a great deal of guidance on the kind of issues that need to be addressed in order to create successful, well-designed places. The Dunsfold Aerodrome allocation is large enough to put all the principles of good urban design into practice. However, Policy SS7 of the submitted plan, concerning the new settlement at Dunsfold Aerodrome, is essentially a planning list of requirements, and does not address design, whilst Policy TD1 of the submitted plan is a general design policy and does not go far enough to guide the design and development of Dunsfold Aerodrome. This aspect of the submitted plan is therefore unsound as it does not put good design at the heart of the plan making process for this strategic site, as sought by the NPPF and elaborated upon by the PPG.
92. **MM23** introduces a new policy into the plan: Policy SS7A: Dunsfold Aerodrome Design Strategy. Its aim is to ensure that the site develops as a special place with its own distinct local character, responds to its landscape setting and its own historic legacy, has a safe, inclusively designed, legible and permeable network of successful streets, greenspaces and public places, and pedestrian, cycle and vehicle routes organised to provide good access to social, community, retail and employment facilities. It requires the developer to produce a masterplan for the whole site that responds to the design principles in Policy SS7A. This will be subject to consultation and be assessed by a design review panel. Subsequent planning applications will need to be consistent with the masterplan. This is a sound approach.
93. In conclusion, the allocation at Dunsfold Aerodrome is a key part of the sustainable growth strategy for the Borough. It provides an excellent opportunity to meet a significant part of the housing needs of the Borough, including affordable housing, on a brownfield site. It is a good example of proactive planning to achieve co-ordinated, well-designed sustainable development and it offers opportunities for comprehensive urban design and master planning and social and transport facilities that smaller peripheral greenfield sites cannot usually offer. Subject to MM22 and MM23, the Dunsfold Aerodrome allocation is sound.

Farnham's role in the spatial strategy

94. The largest allocation of housing is directed to Farnham because it is the biggest town, with a good range of shops, services, social and transport facilities. MM3 raises Farnham's allocated growth to 2,780, from 2,330 dwellings in the submitted plan. This is an entirely reasonable and moderate increase, in line with the sustainable spatial strategy to allocate most development to the largest towns.

95. Three of the plan's strategic sites are located in the town. Coxbridge Farm, Farnham (Policy SS1), allocated for about 350 homes, is also included as an allocation in the Farnham Neighbourhood Plan. As it lies within 5km of both the Thames Basin Heaths SPA and the Wealden Heaths Phase 1 SPA, the Council is proposing to draw attention in the supporting text to the need for avoidance and mitigation measures. The issue of SANG at Farnham is addressed below. Policy SS1 is sound and no MMs are proposed.
96. Land west of Green Lane, Badshot Lea, Farnham (Policy SS2) is also within 5km of the Thames Basin Heaths SPA and the Council similarly proposes to draw attention to the need for avoidance and mitigation measures, as well as the need for sensitivity in relation to Weybourne Local Nature Reserve. **MM18** updates the capacity of the site from 100 to 105 dwellings to reflect the current planning application and also removes the reference to the minerals planning authority, since it would have deferred part of the decision to that authority, when the decision belongs to the local planning authority. In addition, it is unlikely that the prior working of the underlying mineral would be feasible. Subject to MM18, Policy SS2 is sound.
97. The Woolmead, Farnham (Policy SS3) is a town centre redevelopment site allocated for around 100 homes and 4,200 sq metres of retail floorspace. Outline planning permission exists for 96 dwellings on the larger part of the site. To make the policy sound, **MM19** removes the requirement for a comprehensive development, which would have been onerous since the two parts of the site are in separate ownership.
98. The Farnham Neighbourhood Plan has recently been made, and has broad support, but with housing allocations totalling 784 dwellings and a total anticipated supply of 2,201 dwellings, it does not provide for the whole of the submitted plan's allocation to Farnham²³ or the increased housing allocation in MM3. Extra housing allocations will be needed at Farnham in Part 2 of the Local Plan, and potentially through a partial review of the Neighbourhood Plan. The Council proposes to insert additional information into the plan's text to explain how those housing allocations are brought forward, which will be through allocations in Local Plan Part 2 unless there is an early review of the Neighbourhood Plan.²⁴
99. Planning is a continuous process, so whilst it is fully appreciated that a great deal of work has gone into producing the Neighbourhood Plan, the development plan will always need to evolve to reflect changing circumstances. The amount of housing allowed for by the Neighbourhood Plan is too low, being based on the submission plan's housing requirement, which is unsound. That does not make the Neighbourhood Plan itself unsound, but further housing allocations at Farnham will be necessary, with the probable

²³ The reason for this is that its termination date is 2030-31, a year earlier than the Local Plan. Post-hearing information supplied by Farnham Town Council indicates that the current anticipated supply is about 2,330 dwellings.

²⁴ This is a late change proposed by the Council. Being a change to the explanatory text, it is a minor modification that does not go to the soundness of the plan, but for completeness it is included in the text of MM1 in the Schedule of Main Modifications.

need to adjust the built up area boundary. These changes will not diminish the importance or relevance of the work carried out to produce the Neighbourhood Plan, which will remain part of the statutory development plan.

100. Whilst recognising that some of the land around Farnham is subject to landscape and other designations, the Council is being realistic and positive by stating that sufficient suitable sites can be identified including previously identified sites in the 2016 LAA, new sites promoted since the LAA, and sites previously rejected in the LAA. This is in line with the PPG, which advises authorities to revisit the assessment in cases where insufficient sites have been identified, changing the assumptions on development potential, including physical and policy constraints. Appropriate mitigation and other measures could for example make certain sites acceptable.
101. Farnham Town Council has made a case for introducing a phasing policy which would delay the necessary additional allocations at Farnham until later in the plan period. The rationale behind this is that the Farnham Neighbourhood Plan is recent, involved a lot of work and carries a high level of public support. But as mentioned above, any necessary additional allocations would not undermine the work that has already been done and the Neighbourhood Plan would remain part of the development plan. The matter must be considered in the wider context: issues of housing need and affordability are starkly evident across the whole Borough, including Farnham, and the spatial strategy and the housing requirement (including the additional housing arising from MM3) apply to the whole Borough. Farnham, being the largest town, has a key role in delivering the housing requirement and ensuring that a 5 year supply is maintained; the suggested phasing policy would militate against this and could place additional pressure on other locations.
102. Farnham is within 5km of the Thames Basin Heaths SPA. Policy NE3 sets out the requirement for new residential development within 5km of the SPA boundary. Farnham Park has sufficient capacity to provide SANG for the submitted plan allocations in the Farnham area, but the increased housing requirement at Farnham arising from MM3 will require further consideration to be given to the provision of SANG. The amount of extra SANG required to meet the whole of the Farnham allocation could be between 4.75ha and 9.14ha, depending on dwelling occupancy rates.
103. Natural England did not raise objection to the Council's approach in the submission plan, but has suggested that the plan is unsound in respect of the additional 450 dwellings in MM3 unless new strategic SANG is identified now. That is not the case. There is no prospect of harm to the SPA, because permissions affecting it cannot be granted without suitable avoidance and mitigation measures. The real question is whether enough SANG will be identified in due course to allow for the timely delivery of the additional housing requirement in Farnham. On that point, the current level of unused capacity at Farnham Park is sufficient to cater for the majority of the plan's allocations at Farnham, which gives the Council time to take action to find sites suitable for SANG to meet the requirements of the additional 450 dwellings, and there are a number of potential directions that the Council can pursue.

104. One of those is the provision of bespoke SANG on development sites. Some developers indicated during the hearings that their prospective development sites can provide SANG. Some of these sites may have been rejected by the Town Council, but it may be necessary to re-visit previously rejected sites and consider whether they can be made acceptable through mitigation measures. There are also a number of potential strategic SANG sites. The Council's SANG Topic Paper Update (December 2016) indicates that there are opportunities for additional SANG, for example at Farnham Quarry and Runfold Sandpits, with other potential sites at Bishop's Meadow and Hale Road. Clearly the attributes of the sites will need to be evaluated to see whether they are fully capable of meeting SANG requirements, and not all of them may come forward, but discounting all of them would be unduly negative.
105. The range and variety of potential solutions provides sufficient confidence that SANG will be identified and provided to support the additional dwellings in Farnham required by MM3. It is therefore not necessary to identify a strategic SANG site for Local Plan Part 1. The plan's approach is sound.
106. **MM15** updates paragraphs 16.33 and 16.34 to explain how much new SANG will be required for the amount of proposed housing in the Farnham area, and the approach the Council will take towards identifying SANG. This modification is required in the interests of clarity. The terms of Policy NE3 itself would ensure that no harm is caused to the SPA, and no modifications are proposed to it. The evidence does not indicate that the plan is unsound either because it needs to provide more strategic SANG or that housing delivery in Farnham would be delayed or prevented because of the inadequate availability of SANG.
107. Finally, the submitted plan proposes to add to the Green Belt land north east of Farnham around Compton. However, the Green Belt Review does not contain compelling justification; it states that the site would "complement" existing Green Belt, with potential to contain Compton and maintain separation between Aldershot and Farnham, but this is a long way short of demonstrating exceptional circumstances. It is intended in any case to protect this area by introducing a focused Strategic Gap policy in Local Plan Part 2. There are no exceptional circumstances for adding this area to the Green Belt, and **MM13** deletes the relevant section from Policy RE2 in the interests of the soundness of the plan.
108. In respect of Farnham, the plan subject to the main modifications is sound.

Godalming

109. The plan allocates 1,240 dwellings to Godalming and MM3 increases this to 1,520. This is in accordance with SA Addendum Option 3, and is a proportionate increase with an adjustment to take into account the potential for housing at the Aaron's Hill site, discussed below.
110. The submitted plan identifies land south east of Binscombe, Godalming for removal from the Green Belt and inclusion within the settlement boundary. The Green Belt Review had identified wider areas of land suitable for release around Binscombe and Farncombe but the Council rejected some of these areas because they were fragmented. The site identified in the submitted plan is a smaller, well-enclosed piece of land between Binscombe and the built up area of Farncombe, which is separated by Binscombe from the wider

countryside and is closely related to existing development. This area would round off the settlement and would not have an impact on the openness of the wider Green Belt. The release is necessary to help accommodate Godalming's housing needs and the site is well chosen. **MM12** modifies the supporting text to indicate that this land will form part of the settlement area of Godalming and will no longer be within the AGLV, a sound approach to ensure consistency and to enable the site to contribute towards the housing requirement.

111. The Green Belt review identified land at Aaron's Hill, on the western side of the town, as being suitable for removal from the Green Belt. However, the submitted plan indicates that the matter will be considered in Part 2 of the Plan, following discussion with Guildford Borough Council, since the Borough boundary runs along the western side of the site. This leaves an unnecessary degree of uncertainty as to the Plan's intentions. The site is suitable for removal from the Green Belt: it is not of particularly high landscape quality, being flat and rather featureless, the existing urban edge is rather hard and the site would present the opportunity of establishing a better edge to the built up area and a better-defined Green Belt boundary. The Council endorses **MM12**, which removes this land from the Green Belt, a sound modification that makes clear the Plan's intentions and provides the opportunity for the site to be brought forward for housing, subject to appropriate access and other considerations to help meet the overall housing requirement and housing need in Godalming.

112. A further area of land at Milford Golf Course, which is relatively close to Godalming, would also be removed from the Green Belt and this is dealt with under the heading of Milford.

113. Having regard to the characteristics of these sites, the important need to provide for additional housing, the fact that the release of both sites would enable strong new Green Belt boundaries to be established, and the limited impact that their release would have on the important characteristics of Green Belt function, it is evident that the choice of the sites at Aaron's Hill and Binscombe for release from the Green Belt is sound and is justified by exceptional circumstances in each case.

Haslemere

114. The housing allocation in the submitted plan is 830 dwellings, and **MM3** raises this to 990. The allocation remains relatively low for the size of the town because of the presence of Green Belt and AONB. The LAA has not yet identified sufficient suitable sites to meet this number, but additional potentially suitable sites have been assessed in collaboration with Haslemere Town Council through preparatory work for Local Plan Part 2. The town is close to the Wealden Heaths Phase II SPA but, due to the amount of natural greenspace in the area, SANG is not the only potential mitigation measure and there is no need for a strategic SANG. Discussions have taken place with the National Trust to discuss possible projects that could mitigate development in the area. Development will be mitigated on a case-by-case basis as agreed with Natural England. The strategy is sound.

Cranleigh

115. Cranleigh has a substantial population, a high street with a good range of shops, cafes and other uses, and has local schools and community facilities. So although it is celebrated by some as "England's largest village", it is appropriate to count it for the purposes of the strategy as one of the main towns, and it is suitable for accommodating strategic site allocations. The submitted plan allocates two of the strategic sites to the village in recognition of the fact that it is one of the less constrained areas in terms of Green Belt, landscape and environment. **MM3** increases Cranleigh's housing allocation modestly from 1,520 dwellings to 1,700 dwellings. The apportionment of development to Cranleigh is in accordance with the spatial strategy and is sound.
116. A site at Horsham Road, Cranleigh (Policy SS4) is allocated for about 250 homes in two phases, with the first phase having been granted planning permission in 2016. **MM20** deletes the policy requirement that would have prevented development of phase 2 before the substantial completion of phase 1 in the interests of flexibility and to reflect the current situation, in which construction is under way. Subject to that modification, the policy is sound.
117. Land south of Elmbridge Road and the High Street, Cranleigh (Policy SS5) is allocated for 765 homes and a country park. It is in three ownerships and the submitted policy requires a holistic and integrated scheme for the whole site. To bring the policy into line with the terms of the planning permissions for the three parts of the site, **MM21** deletes the requirement for a staged delivery with the parts of the site closest to the village centre being developed first, since the permissions do not contain that requirement. Subject to that modification, the policy is sound.
118. The submitted plan proposes to add land north of Cranleigh to the Green Belt. However, the conclusions of the Green Belt Review do not provide convincing justification. The Review does not use compelling terms to suggest a strong need for boundary changes. The area would have a "potential role" in limiting ribbon development, protecting the land from urbanisation and preserving the village setting, but there is little to suggest that Green Belt designation would be necessary to achieve these ends compared with the application of normal settlement boundary and countryside protection policies. Moreover the land includes Cranleigh School whose ability to adapt and expand would be considerably restricted by Green Belt designation. This proposed change to the Green Belt boundary is not justified by exceptional circumstances and **MM13** deletes the relevant section from Policy RE2 in the interests of the soundness of the plan.

Milford

119. Milford is proposed for removal from the Green Belt. As discussed above, this is justified by exceptional circumstances as it would enable the village to cater for modest development needs.
120. It is also proposed to release land from the Green Belt for strategic housing site SS6, land opposite Milford Golf Course, which is allocated for around 180 dwellings. Although partially serving Milford, this site is also well related to Godalming. It is relatively flat and well-enclosed and development would have very little effect on the wider landscape or on the openness of the Green Belt

other than the site itself. The Green Belt Review pointed towards the potential for release of this land and the setting of a long-term village development boundary in conjunction with the removal of the whole village from the Green Belt.

121. In the pre-submission consultation version of the plan, this land was shown as a strategic site for housing but was not removed from the Green Belt, the expectation being that the Green Belt boundary would be adjusted later, in Local Plan Part 2. However, it is not a sound approach to allocate a strategic site for housing but leave it in the Green Belt as this would signal mixed intentions and undermine the value of the housing allocation. **MM12** modifies Policy RE2 to remove the land from the Green Belt; this is consistent with the housing allocation and enables the site to be brought forward earlier to help meet the housing requirement.
122. There is an 88 year old covenant on the land limiting development to 27 dwellings. Covenants are not normally planning matters, but it has been suggested that, were delivery restricted to only 27 dwellings, this would not represent the exceptional circumstances required to support the change in the Green Belt boundary. However, the need for housing land to be made available in the public interest and the strategic exceptional circumstances for Green Belt release point to a reasonable prospect of the covenant being varied, modified or discharged under s84 of the Law of Property Act 1925 to enable the full capacity of the site to be achieved.
123. A project-level HRA assessment will be required for site SS6 due to its proximity to the Wealden Heaths Phase 1 SPA. The site is well-related to the built-up part of the village and its services and to Milford Station and to the A3100, the main road into Godalming. There is a footway into the village which is narrow where it passes over a river bridge, but there is no notable accident record here and the route is capable of accommodating the pedestrian traffic from a development of about 180 dwellings. There may also be scope to provide other pedestrian and cycle links into the village. These are requirements of the policy. Station Lane is restricted to 40mph and is lit, and if considered necessary there may be scope to reduce the speed limit. The site is capable of accommodating a vehicle access with good sight lines. The allocation is sound.
124. Secretts Garden Centre has been suggested as an alternative to site SS6. However, it is also within the Green Belt, and is not a location that was specifically identified for release from the Green Belt in the Green Belt Review, so it is not a non-Green Belt alternative to allocation SS6. It is also less well related to the station. Whether it amounts to previously developed land, whether it is suitable for development, and what its capacity might be, are matters for separate consideration and are not for this report, but the allocation of site SS6 would not prevent previously developed Green Belt sites from being considered for redevelopment provided they were in accordance with the NPPF and the Local Plan.
125. Having regard to the characteristics of the site opposite Milford Golf Course, the pressing need to provide for additional housing, the ability of the site to help towards meeting the housing needs of both Godalming and Milford, the sustainable location of the site, the fact that it is well enclosed and would

enable a strong new Green Belt boundary to be established, and the limited impact that the site's release would have on the important characteristics of Green Belt function, it is evident that this is a very well-chosen site and its release from the Green Belt is justified by exceptional circumstances.

Chiddingfold, Elstead and Witley

126. The plan removes the existing settlement areas of Chiddingfold, Elstead and Witley from the Green Belt and identifies sites outside the settlement boundaries for removal from the Green Belt in Part 2 of the Plan. With the exception of Chiddingfold, these are marked by asterisks on the village plan insets in the submitted plan, rather than boundary lines, because their boundaries have not yet been defined. The sites are relatively small pieces of land identified by the Green Belt Review, or by the Council, which are well-related to the villages, make a limited contribution to the openness of the Green Belt, and are capable of accommodating the modest levels of growth allocated to these villages. The sites will not necessarily all be released from the Green Belt; the intention is that more detailed site investigation work will be carried out through neighbourhood plans and in the preparatory work for Local Plan Part 2, with the neighbourhood plans potentially setting the settlement boundaries and Local Plan Part 2 establishing the detailed changes to the Green Belt boundary. This approach will provide the opportunity for local consultation in firming up the sites and defining their precise boundaries.

127. Having regard to the overall housing need, the characteristics of these villages, discussed under the Green Belt heading above, the modest scale of the sites and their close relationship to the villages, and the potential opportunity through Local Plan Part 2 to define their boundaries in a way which would not significantly compromise the function of the Green Belt, there are exceptional circumstances which justify releasing these modest pieces of land from the Green Belt. **MM12** deletes the less precise supporting text to give greater clarity to the approach the Council will take to Green Belt release in Part 2 of the Local Plan, and brings the approach at Chiddingfold into line with the other villages. Subject to this modification, the plan's approach to this matter is sound.

Other villages

128. The submitted plan allocates modest amounts of additional housing to the villages broadly in proportion to their size but taking into account opportunities and constraints. MM3 increases the allocation, but the numbers of additional dwellings remain relatively small. The approach to these villages is in line with the spatial strategy and neither the submitted plan nor the additional allocation in MM3 proposes an excessive or disproportionate increase for any of the villages. The plan's approach is sound.

Spatial strategy: conclusion

129. The plan's spatial strategy is sound subject to the main modifications including the distribution of the additional housing arising from MM3.

Issue 3: Whether the development management policies of the plan are clear, effective and consistent with statute, Government policy and guidance.

130. Not every policy is discussed in this section. Where policies are not mentioned here, they have either been discussed previously in this report or they are considered sound and it is unnecessary to comment on them. A number of MMs are required to the contents of some of the policies in the submitted plan to ensure that they are sound.
131. **Policy ST1: Sustainable Transport:** Criterion 1 of the submitted plan requires all development to be located where it is accessible by forms of travel other than the private car. This is too rigid to apply to all development and would conflict with Policy EE1 (as modified by MM8: see below) which promotes a strong rural economy, and with Policy SP2 which allows for limited growth in the villages. **MM5** alters the policy so that it seeks to maximise opportunities for sustainable transport modes whilst recognising the nature of the scheme and the location of the site, and recognises that different measures will be required in urban and rural locations. The policy is sound subject to this modification.
132. **Policy EE1: New Economic Development:** the text in the submitted plan is very limited in what it says about the rural economy, confining itself to the re-use and conversion of existing buildings, and is therefore in conflict with the NPPF. **MM8** seeks to promote a strong rural economy and, in addition to building conversions, promotes the development and diversification of agricultural and other land-based rural businesses. It also clarifies the text in respect of the forthcoming Part 2 of the Plan. Subject to MM8 the policy is sound.
133. **Policy EE2: Protecting Existing Employment Sites:** in the submitted plan, this appears as a negatively worded policy that would act to restrict reasonable proposals for residential development on employment sites in suitable circumstances. It is not positively prepared and would be in conflict with the NPPF. **MM9** alters the policy to make it more positively worded and sets out the circumstances in which a change to residential use would normally be approved. It also alters some of the text relating to Part 2 of the Plan for the sake of clarity. The policy is sound subject to this modification.
134. **Policy TCS1: Town Centres** establishes where the focus of town centre uses should be and **Policy TCS2: Local Centres** set out the role of such centres. In the interests of clarity and soundness, **MM10** inserts the names of the four main towns into Policy TCS1, and deletes the references to prior approval, since the conditions governing prior approval are set out in full in Schedule 2 to the General Permitted Development Order; a local planning authority cannot consider any other matters when determining a prior approval application.
135. **Policy LRC1: Leisure, Recreation and Cultural Facilities:** **MM11** re-writes the policy to make it more positively-worded and flexible than that in the submitted plan, clearer as to the different requirements for outdoor and indoor facilities, and more closely aligned with the NPPF. The re-written policy is sound.

136. **Policy RE3: Landscape Character:** a substantial part of the rural area of the Borough is included within the Surrey Hills AONB, but there are also a number of local landscape designations. It is not necessary to describe each one in this report, but it is acceptable for the Plan to contain local landscape designations if they assist in setting out broad areas of "valued" landscape in NPPF terms and help to explain what is expected of development proposals within them.
137. The main issue in respect of Policy RE3 relates to the Area of Great Landscape Value, a local designation. The AGLV is contiguous with some of the AONB but extends beyond it near Farnham and Godalming. Natural England is due to review the AONB boundary in 2018 and this may take in some of the AGLV. In the meantime it is reasonable for the Plan to retain the AGLV designation and apply similar principles for its protection as those for the AONB; this is consistent with approach taken by the development plan in other Surrey districts with AGLV land.
138. However, the Plan must at the same time recognise that the AGLV is a local designation. **MM14** clarifies that the AONB is of national importance and its protection and enhancement are subject to national planning policies, and that the protection of the AGLV will be commensurate with its status as a local landscape designation. This reflects paragraph 113 of the NPPF. Other changes within MM14 clarify that the land south of Holy Cross Hospital, Haslemere is to be retained in the Area of Strategic Visual Importance. These changes are all necessary for consistency and clarity.
139. **Policy NE3: Thames Basin Heaths Special Protection Area:** Farnham is within 5km of the Thames Basin Heaths SPA. Policy NE3 sets out the requirement for new residential development within 5km of the SPA boundary. The position regarding the SPA and housing delivery at Farnham is discussed above in relation to the spatial strategy.
140. **Policy CC2: Sustainable Construction and Design** contains a number of factors that will be taken into account to promote sustainable forms of development and reduce greenhouse gas emissions. In the interests of water conservation and to avoid additional water stress, **MM16** seeks to ensure that new dwellings meet a maximum water requirement of 110 litres of water per person per day. It also seeks the highest available speed broadband infrastructure in new developments to reduce the need to travel. These modifications reinforce the effectiveness of the policy and are sound.

Assessment of Legal Compliance

141. My examination of the compliance of the Plan with the legal requirements is summarised in the table below. I conclude that the Plan meets them all.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The Local Plan has been prepared in accordance with the Council's LDS (the latest version being October 2017).
Statement of Community Involvement (SCI) and relevant regulations	The SCI was adopted in August 2014. Consultation on the Local Plan and the MMs has complied with its requirements.
Sustainability Appraisal (SA)	SA has been carried out and is adequate. The SA addendum is also adequate.
Habitats Regulations Assessment (HRA)	Habitats Regulations Assessment screening has been carried out, together with Appropriate Assessment for each of the five European sites in the Borough (July 2016). The effects of MM3 have been considered in the HRA Addendum (September 2017).
Climate change adaptation and mitigation	The Local Plan includes policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change. Of particular relevance in this respect are Policy SP2: Spatial Strategy; Policy ST1: Sustainable Transport; Policy TCS1: Town Centres; Policies CC1 to CC4 relating to climate change, sustainable construction and design, renewable energy development and flood risk management; and the requirements of the strategic site policies SS1 to SS9.
National Policy	The Local Plan complies with national policy except where indicated and MMs are recommended.
2004 Act (as amended) and 2012 Regulations.	The Local Plan complies with the Act and the Regulations.

Overall Conclusion and Recommendation

142. The Plan has a number of deficiencies in respect of soundness for the reasons set out above, which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues set out above.

143. The Council has requested that I recommend MMs to make the Plan sound and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix the Waverley Borough Local Plan Part 1 satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

Jonathan Bore

Inspector

This report is accompanied by an Appendix containing the Main Modifications.

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Waverley Borough Local Plan Part 1: Strategic Policies and Sites

Final Schedule of Main Modifications

Schedule of Proposed Main Modifications to Local Plan Part 1

Introduction

Where text has been changed, deleted text is shown as ~~struck through~~ and additional text is shown in **bold**.

Please note that the page numbers given in the table below relate to the Tracked Changes Modifications version.

Schedule of Proposed Main Modifications to Local Plan Part 1

Mod No.	Document Page no.	Para/ Policy	Modified text (deleted text shown as struck through and additional text shown in bold)
MM1	Various	Various	Changes to the title of Local Plan Part 2 to read: " Local Plan Part 2: Site Allocations and Development Management Policies " (see para 7.8, page 8-5 Delivery section, Policy AHN4 (second para), page 9-14 delivery section, Policy EE1, page 10-9 Delivery section, para 11.5, page 11-11 delivery section, para 16.20, page 17-10 Delivery section, Appendix F (page F-5 row EE1) Appendix F (page F-5 row EE2), Appendix F (page F-11 row CC1-CC3), Appendix F (page F-12 row CC4)
MM1	Page 1-1	Para 1.2	Amend 6th and 7th sentences and add new 8 th sentence to read: 'The Local Plan Part 1 provides the framework for other Local Plan documents which will contain more detailed policies and the identification and allocation of land for non-strategic development to support the overall vision and strategy for the area. Local Plan Part 2, which is to follow, will contain non-strategic development management policies and other site allocations and land designations. The scope of Local Plan Part 2 provides the potential to allocate sites of any size. '
MM1	Page 6-6	Para 6.24	Amend second sentence as follows: ' Smaller non-strategic Additional housing sites will be allocated in Part 2 of the Local Plan and in neighbourhood plans being produced by town and parish councils. The Farnham Neighbourhood Plan, which was made in July 2017, includes some site allocations for housing. The additional housing required in Farnham, which is currently identified in Appendix D, will be allocated in Local Plan Part 2, unless Farnham Town Council decides to commence an early review of the Neighbourhood Plan, such that all sites required to deliver this housing can be delivered well before the end of the plan period. '
MM1	Page 19-1	Para 19.2	Amend to read: 'In addition, subsequent policies and guidance will be produced to supplement this plan, including in Local Plan Part 2, which will allocate non-strategic additional development sites and, if required, through planning briefs and supplementary planning documents. In addition, many communities are producing neighbourhood plans and some of these will allocate non-strategic strategic sites for development.'
MM2	Page 5-7	Policy SP2	Amend SP2 criterion 1 - 'avoid major development on land of the highest amenity and landscape value... '.

Schedule of Proposed Main Modifications to Local Plan Part 1

Mod No.	Document Page no.	Para/ Policy	Modified text (deleted text shown as struck through and additional text shown in bold)
MM2	Page 5-7	Policy SP2	Amend criterion 3 to read 'whilst recognising that due to Green Belt and other constraints the Green Belt Review recommended that Bramley remains washed over and therefore has more limited scope for development'.
MM2	Page 5-7	Policy SP2	Criterion 6 – amend second sentence to 'More details are given in Policy Policies SS7 and SS7A '.
MM2	Page 5-7	Policy SP2	Criterion 7 – Amend second sentence to read ' Non-strategic Additional sites will be identified and allocated through Local Plan Part 2 and neighbourhood plans'.
MM2	Page A-1 to A-2	Appendix A Key Diagram	Amend to reflect changes elsewhere in the Local Plan, including Green Belt changes and housing allocations (see below).
MM2	Page E-1	Appendix E Policies Map changes	Amend to read: ' Adopted Submission Adopted Policies Map: Changes from Adopted 2002 Local Plan Proposals Map'. Local Plan Part 1 has resulted in would result, on adoption, to the following changes to the Policies Map.
MM3	Page 6-6 to 6-7	Policy ALH1	Amend as follows: 'The Council will make provision for at least 9,864 11,210 net additional homes in the period from 2013 to 2032 (equivalent to at least 549 590 dwellings a year. 'Each parish is allocated the following minimum number of new homes to accommodate (including homes permitted and built since April 2013 and, in the case of the main settlements, anticipated windfall development): <u>Main settlements</u> Farnham: 2,330 2,780 Godalming: 1,240 1,520 Haslemere: 830 990 Cranleigh: 1,520 1,700 Dunsfold Aerodrome new settlement: up to 2,600 <u>Large Villages</u> Bramley 70 90 Chiddingfold 400 130

Schedule of Proposed Main Modifications to Local Plan Part 1

Mod No.	Document Page no.	Para/ Policy	Modified text (deleted text shown as struck through and additional text shown in bold)
			<p>Elstead and Weyburn Neighbourhood Plan area 450 160 Witley (including Milford) 380 480</p> <p><u>Smaller villages</u> Alfold (not including Dunsfold Aerodrome) 400 125 Churt 40 15 Dunsfold (not including Dunsfold Aerodrome) 80 100 Ewhurst 65 100 Frensham 45 20 Tilford 45 20 Wonersh and Shamley Green 20 30</p> <p>In addition, 485 188 dwellings are anticipated to be delivered on windfall sites in the large and smaller villages, based on past trends. 454 157 dwellings have been built or have an outstanding planning permission in other areas not shown above.</p>
MM3	Page 4-1	Objective 2	Amend first sentence of Objective 2 to read: 'To support the delivery of at least 11,210 additional homes in Waverley in the period 2013 to 2032 (an average of 590 homes a year).'
MM3	Page 5-5	Para 5.22 (formerly 5.21)	Amend the second sentence in the first bullet point as follows: 'The full objectively assessed need for housing (including an allowance for meeting unmet needs from Woking) has been assessed in the SHMA as 549 590 homes per annum, far above the South East Plan target for Waverley at the time of the appeal'.
MM3	Page 6.1	Para 6.1	Amend second sentence to read: 'The Local Plan looks forward 15 years and sets out the strategy to develop at least 11,210 9,864 new homes in the period from 2013 to 2032.'

Schedule of Proposed Main Modifications to Local Plan Part 1

Mod No.	Document Page no.	Para/ Policy	Modified text (deleted text shown as struck through and additional text shown in bold)
MM3	Page 6-1 to 6-2	Para 6.6	Amend whole paragraph to read 'The SHMA indicates that the objectively assessed need for housing in Waverley is 519 dwellings per annum or the period 2013 to 2033.' Based on the latest household projections 2014 and vacancy rates from the 2011 Census, the objectively assessed housing need for Waverley is 396 new homes a year from 2013 to 2032. However, given the need to tackle affordability, increase the provision of affordable homes and to take into account anticipated changes to migration from London to Waverley, there is a need to uplift the number of homes by an additional 111 homes a year. This results in 507 new dwellings needed a year. However, Woking's adopted Core Strategy seeks to deliver 292 homes per annum against its objectively assessed need of 517 homes per annum. This leaves a shortfall of 3,150 homes over the period from 2013 to the end of Woking's Core Strategy in 2027. In accordance with Paragraph 47 of the NPPF as Waverley and Guildford are within the West Surrey housing market areas they are expected, where possible, to meet Woking's unmet housing need. Meeting half of this results in an additional 83 new dwellings a year from 2013 to 2032.'
MM3	Page 6-2	Para 6.9	Update paragraph to read: 'Having taken account of the above factors, the spatial strategy seeks to meet the objectively assessed need for housing of 507 new dwellings a year in full and half of Woking's unmet needs (83 new dwellings a year) despite the constraints set out in paragraph 6.4.'
MM3	Page 6-2	Para 6.10	Update with new housing figure as follows: 'The housing target in this plan is to deliver at least 9,864 11,210 new homes between 2013 and 2032.'
MM3	Page 6-2	Para 6.11	Update in respect of the housing requirement and the new housing trajectory base date to read: 'A housing trajectory has been produced to illustrate the expected rate of housing delivery for the whole plan period to 2032 (see Appendix C). This shows how much new housing is anticipated to be delivered and by when, based on current data. This shows that by the end of the plan period, the full identified objectively assessed need of 11,210 9,864 homes (549 590 homes per year) will have been delivered. The trajectory also shows that, at the point when the Local Plan Part 1 is expected to be adopted (2017), there will be a five year supply of housing land that will be maintained into the future . The trajectory has taken into account evidence on the delivery of housing including where relevant the information provided by site promoters, but to ensure that it is realistic, a cautious approach has been taken on when some of the larger sites will be delivered. The projected components of housing supply are summarised in the following table:'

Schedule of Proposed Main Modifications to Local Plan Part 1

Mod No.	Document Page no.	Para/ Policy	Modified text (deleted text shown as struck through and additional text shown in bold)
MM3	Page 6-4	Para 6.16	Update first two sentences to refer to new housing requirement and distribution to read. ‘There is not enough suitable land for housing within existing settlements to meet the need for new homes in Waverley. Therefore, the Council’s strategy for housing delivery includes making selected releases of greenfield land around settlements to deliver around 2,300 dwellings.
MM3	Page 6-5	Para 6.22	Amend first sentence to read: ‘Based on the above considerations, the Local Plan allocates each of the parishes with towns and villages in the top three tiers of the settlement hierarchy with a minimum number of homes to deliver over the plan period.’ Amend second sentence to read ‘These allocations were derived from an assessment of the components of the housing land supply outlined above in Table 6.1, including completions from 2013 to 2046 2017 , outstanding planning permissions, allocations in the Farnham Neighbourhood Plan , sites in the LAA, both within and outside settlements suitable for allocation in Local Plan Part 2 or neighbourhood plans , windfalls...’
MM3	Page 18-1	Para 18.1	Final sentence to be amended as follows: ‘This is considered to provide a balance between certainty of delivery through the Local Plan and providing the opportunity for town and parish councils to allocate (should they wish) non-strategic sites through their neighbourhood plans, in accordance with the minimum target for parishes set out in Policy ALH1.’
MM3	Page 18-16	Para 18.14	Amend sixth sentence to: ‘ The full objectively assessed need for housing, including the allowance for meeting unmet housing needs from Woking , has been assessed in the SHMA as 519 590 homes per annum, far above the South East Plan target for Waverley that applied at the time of the appeal.’
MM3	Page F-1	Appendix F	In row for SP2: Spatial Strategy, amend first target to “• Delivery of 9,864 11,210 net additional homes between 2013 and 2032 (519 590 dwellings per year).”
MM3	Page F-1	Appendix F	In row for ALH1: The Amount and Location of Housing, amend target to “• Delivery of 9,864 11,210 net additional homes between 2013 and 2032 (519 590 dwellings per year).”

Schedule of Proposed Main Modifications to Local Plan Part 1

Mod No.	Document Page no.	Para/ Policy	Modified text (deleted text shown as struck through and additional text shown in bold)
MM4	Page 6-2	Table 6.1	Update Table to reflect April 2017 figures and recently 'made' Farnham Neighbourhood Plan. See below
MM4	Page 6-3	Para 6.12	Update in respect of windfall estimates to read: 'The Council's strategy for future housing delivery includes an allowance for small windfall sites (1-4 net increase) within settlements, based on past trends (excluding garden land). It is estimated that 450 468 dwellings will come forward on small windfall sites from 2019 2020 to 2032. An allowance has also been made for large windfall sites within settlements in the latter part of the plan period (2026 2027 onwards) as the LAA mainly identifies specific sites likely to come forward in the next ten years of the plan period. This could include, for example, additional housing coming forward through the redevelopment or intensification of existing employment sites. It is estimated that about 550 494 homes could be delivered from larger windfall sites from 2026 2027 -32 based on past trends, but this is likely to be an underestimation of the supply from large sites due to the recent changes in the planning system that allow many employment sites to be used for housing without the need for express planning permission.'
MM4	Page 6-4	Para 6.15	Amend first and second sentences to read: 'It is considered that sites with an existing unimplemented planning permission, sites within settlements identified in the Land Availability Assessment and small windfall sites will be able to deliver around 3,700 4,400 new dwellings in the plan period. A significant proportion of these could potentially be delivered between 2016 2017 and 2021 2022 .'
MM4	Pages C1 to C-4	Appendix C Trajectory	Replace with updated Housing Trajectory (see below).
MM4	Pages D-1 to D-2	Appendix D Explanation of Parish Allocation figures	Replace with updated table setting out components of the housing land supply (see below)

Schedule of Proposed Main Modifications to Local Plan Part 1

Mod No.	Document Page no.	Para/ Policy	Modified text (deleted text shown as struck through and additional text shown in bold)
MM5	Page 7-5	Policy ST1	<p>Within the policy, amend bullet point 1 to read: 'are located where it is accessible by forms of travel other than the private car; the opportunities for sustainable transport modes can be maximised, reflecting the amount of movement generated, the nature and location of the site and recognising that solutions and measures will vary from urban to rural locations;'</p>
MM6	Page 9-4	Policy AHN1	<p>Amend first paragraph to read: 'Unless specified on sites identified in this Local Plan Part 1, Local Plan Part 2 or neighbouring plans,†The Council will require a minimum provision of 30% affordable housing on all housing developments where at least one of the following applies.'</p>
MM6	Page 9-5	Policy AHN1	<p>Additional/ amended wording of second paragraph to read: 'On developments in rural areas where the net number of dwellings is fewer than 11 dwellings, the contribution may be in the form of a paymentfinancial contribution equivalent to...'</p>

Schedule of Proposed Main Modifications to Local Plan Part 1

Mod No.	Document Page no.	Para/ Policy	Modified text (deleted text shown as struck through and additional text shown in bold)
MM7	Page 9-14	Policy AHN4	<p>Amend penultimate paragraph to read: Allocations or proposals for permanent and transit sites for Gypsies, Travellers and Travelling Showpeople will only be permitted if:</p> <ul style="list-style-type: none"> • they are necessary in order to meet the requirements of an appropriate assessment of need; • safe and convenient vehicular and pedestrian access to the site can be provided.....
MM8	Page 10-6 to 10-7	Policy EE1	<p>Amend as EE1 as follows: 'The provision of development for economic growth to meet the needs of the economy, including at least 16,000 sq m of new Use Classes B1a/b (Offices/Research and Development) floorspace, will be delivered through:</p> <p>a) The allocation of sites for additional employment floorspace:</p> <ul style="list-style-type: none"> • On Land off Water Lane, Farnham in accordance with Policy SS9 of this Local Plan • On Land at Dunsfold Aerodrome in accordance with Policy SS7and SS7A of this Plan • In accordance with relevant saved policies of the Waverley Borough Local Plan 2002 and in Local Plan Part 2: Non Strategic Policies and Sites Site Allocations and Development Management Policies <p>b) Permitting new employment development within defined settlements that meets the criteria set out in relevant saved policies of the Waverley Borough Local Plan 2002, or set out in Local Plan Part 2: Site Allocations and Development Management Policies.</p> <p>c) Permitting the sustainable redevelopment, intensification and/or expansion of sites presently used for employment uses that meets the criteria set out in relevant saved policies of the Waverley Borough Local Plan 2002, or set out in Local Plan Part 2: Non Strategic Policies and Sites Site Allocations and Development Management Policies.</p> <p>d) Promoting a strong rural economy through the re-use and conversion of existing buildings and well-designed buildings for economic development and promoting the</p>

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			<p>development and diversification of agricultural and other land based rural businesses. Permitting the re-use and conversion of existing rural buildings for economic development in accordance with the criteria of saved Policy RD7 of the Waverley Borough Local Plan 2002.</p> <p>e) Making provision for accommodation for visitors to the Borough, both in terms of business trips and tourism related visits.</p> <p>For the purposes of this policy, planning applications for new economic development will take into account any:</p> <ul style="list-style-type: none"> • loss of residential, leisure, shopping, community or other uses which contribute to the character, function, vitality or viability of the locality • impact of development on the amenities or privacy of nearby residents or on the character and appearance of the area.'
MM9	Page 10-8 to 10-9	Policy EE2	<p>Amend first paragraph as follows: 'The Council will protect permit the change of use of existing employment sites against to residential and other alternative uses where unless it can be demonstrated that there is no reasonable prospect of the site being used for employment use. Existing employment sites include sites specifically identified by saved Waverley Borough Local Plan 2002 Policies IC2 and IC3, sites identified in Local Plan Part 2: Site Allocations and Development Management Policies, as well as other existing employment sites within the B Use Classes. Add new second paragraph 'Where there is an identified need for new homes, the Council will normally approve applications for a change to residential use and any associated development from employment use subject to there being no strong economic reasons why such a development would be inappropriate.'</p> <p>Amend final sentence of final paragraph as follows: 'specific economic need and the provisions of Policy WD2 of the Surrey Waste Plan 2008 or equivalent adopted policies in a New Surrey Waste Plan 2018-2033.'</p>
MM10	Page 11-7 to 11-8	Policy TCS1	<p>Amend sub-para 1 of the policy to read: 'Applications for main town centre uses should be located in the town centres of Farnham, Godalming, Haslemere and Cranleigh'.</p>

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Mod No.	Document Page no.	Para/ Policy	Modified text (deleted text shown as struck through and additional text shown in bold)
			<p>Amend sub-para 4 to read: 'The Primary Shopping Areas will be the main focus, particularly at ground level, for A1 retail uses. Where planning permission or prior approval is required, these will be protected unless it can be determined that a change of use would not have significant harmful effects on the frontage and the vitality and viability of the town centre or result in an over-concentration of non-retail uses.'</p> <p>Amend sub-para 6 to read: Local Plan (Non-Strategic Sites and Allocations) (Site Allocations and Development Management Policies)</p>
MM10	Page 11-9	Policy TCS2	Remove the words ' or prior approval ' from the third line of the policy.
MM11	Page 12-7 to 12-9	Policy LRC1	<p>Replace with new Policy as follows: 'Leisure and Recreation Facilities</p> <p><u>1. Existing open space, outdoor leisure and recreation facilities</u> The Council will seek to retain, enhance and increase the quantity and quality of open space, leisure and recreation facilities and to improve access to them. Development involving the loss of open space, leisure and recreation facilities, or their change of use, will be granted permission if evidence demonstrates that:</p> <ul style="list-style-type: none"> a) the existing use is no longer required; b) no other leisure or recreation provision is required or appropriate in that area; c) alternative provision of a suitable scale and type and in a suitable location can be made; <p>or</p> <ul style="list-style-type: none"> d) The development is for alternative sports and recreation provision, the needs for which clearly outweigh the loss, and it can be demonstrated that there are no reasonable alternative sites available. <p><u>2. New open Space, outdoor leisure and recreation facilities in new developments</u> The Council will encourage the provision of new open space, sports, leisure, and recreation facilities and the promotion of outdoor recreation and access to the countryside, taking account of the most up to date assessments.</p> <p>Proposals for new residential development will be expected to make provision for play space having regard to Fields in Trust standards as set out in Table 1.</p> <p>The Council will also seek to secure the provision of new pitches or contributions towards</p>

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			<p>improvements to existing pitches taking account of the current local standards set out in Table 2, or in accordance with the most up to date assessment/ strategy to ensure that there is adequate provision made in the Borough. Extensions, new buildings or facilities to complement the use of open space or other existing facilities will be supported, provided that they comply with other policies in the Local Plan.</p> <p>Where a need arises for new or improved facilities as a direct result of development then appropriate contributions of on-site provision will be sought in accordance with Policy ICS1.</p> <p>The Council will support positive measures and co-operative action to secure appropriate public access for water-based and waterside recreation, provided it does not conflict with nature conservation interests.</p> <p><u>3. Existing indoor sports, leisure, recreation and cultural facilities</u> Development involving the loss of indoor leisure, recreation and cultural facilities, or their change of use, will be granted permission if evidence demonstrates that:</p> <ul style="list-style-type: none"> a) the existing use is no longer required; b) no other leisure, recreation or cultural provision is required or appropriate in that area; c) alternative provision of a suitable scale and type and in a suitable location can be made; <p>or</p> <ul style="list-style-type: none"> d) The development is for alternative leisure, recreation or cultural provision, the needs for which clearly outweigh the loss, and it can be demonstrated that there are no reasonable alternative sites available. <p><u>4. New indoor sports and cultural facilities and new developments</u> The Council will encourage the provision of new indoor sports, and cultural facilities taking account of the most up to date assessments to ensure that there is adequate provision made in the Borough.</p> <p>Where a need arises for new facilities as a direct result of development then appropriate contributions of on-site provision will be sought in accordance with Policy ICS1.</p> <p>Proposals for new residential development will be expected to make provision for play space in accordance with Fields in Trust standards as set out in Table 1.</p> <p>The Council will seek to secure the provision of new pitches or contributions towards improvements to existing pitches taking account of the current local standards set out in Table 2, or in accordance with the most up to date assessment to ensure that there is adequate provision made in the Borough.</p>

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			<p>The Council will seek positive measures and co-operative action to secure appropriate public access for water-based and waterside recreation, provided it does not conflict with nature conservation interests.</p> <p>Leisure, recreation and cultural facilities will be safeguarded from development. If the use of an existing facility is to be changed, evidence must be presented demonstrating that,</p> <p>a) the existing use is no longer required or viable;</p> <p>b) no other leisure, recreation or cultural provision is required or appropriate in that area; or</p> <p>c) alternative provision of a suitable scale and type and in a suitable location can be made.</p> <p>Where a need arises for new or improved facilities as a direct result of development then appropriate contributions of on-site provision will be sought in accordance with Policy ICS1. The Council will encourage the provision of new open space, sports, leisure, cultural and recreation facilities and the promotion of outdoor recreation and access to the countryside, taking account of the evidence in the Open Space, Sport, Leisure and Recreation (PPG17) Study 2012; the Waverley Playing Pitch Strategy March 2013; and the Waverley Play Area Strategy 2015–2024, the draft Cultural Strategy and any subsequent updates, provided they accord with relevant national and local planning policies.</p>
MM12	Page 13-15	Policy RE2	<p>Amend Policy RE2 with new bullet point in paragraph 3:</p> <p>'The following changes to the Green Belt are made in this Plan:</p> <ul style="list-style-type: none"> • Removal of land south east of Binscombe, Godalming • Removal of land between Aarons Hill and Halfway Lane, Godalming...
MM12	Page 13-15	Policy RE2	<p>Amend Policy RE2 with new bullet point in paragraph 3 to read:</p> <p>'The following changes to the Green Belt are made in this Plan:</p> <p>...</p> <ul style="list-style-type: none"> • Removal of Chiddingfold, Elstead, Milford and Witley (within the current Rural Settlement boundaries) • 'Removal of land opposite Milford Golf Course...'
MM12	Page 13-16	Policy RE2	<p>Amend Policy RE2 in paragraph 4 as follows</p> <p>'The following changes to the Green Belt will be made in Local Plan Part 2, with the boundaries to be defined following consultation with local communities:</p> <ul style="list-style-type: none"> • Removal of land between Aarons Hill and Halfway Lane, Godalming and'...

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MM12	Page 6-4	Para 6-17	Amend second sentence as follows: 'However, one two areas has have been identified, one on the northern edge of Godalming near Binscombe, and another on the western edge of Godalming between Aaron's Hill and Halfway Lane , where a small changes to the Green Belt would not compromise the role and purpose of the Green Belt in Waverley.'
MM12	Page 6-4 to 6-5	Para 6.19	After first sentence add a new sentence: ' One site on the eastern edge of Milford, opposite Milford Golf Course, is to be removed from the Green Belt in this Plan and allocated as a strategic housing site. ' Amend following sentence to read 'More details on the proposed changes are given in Chapters 13 and 18. ' Change the penultimate sentence to 'The intention is that through Local Plan Part 2, working with parish councils where appropriate , the Council will review these settlement boundaries with the intention of resolving any anomalies, including reviewing Green Belt boundaries where necessary'.
MM12	Page 13-3	Para 13.12	Add to end of fourth sentence: 'This area is to be removed from the Green Belt as shown on Plan 1, in Local Plan Part 1. '
MM12	Page 13-3	Para 13.12	Additional sentence at end of paragraph 13.12 to read: 'The land being removed from the Green Belt will now form part of the settlement area of Godalming and will no longer be within the Area of Great Landscape Value.'
MM12	Page 13-3 to 13-4	Plan 1	Amend to show that area is also removed from AGLV and incorporated within the settlement area. See end of schedule.
MM12	Page 13-4	Para 13.15	Replace existing paragraph 13.15 with a new paragraph to read: 'Subject to further discussions with Guildford Borough Council, the area shown on Plan 2 could be suitable for removal from the Green Belt. There is currently insufficient information on its deliverability for housing. Therefore, this matter will be considered further in Local Plan Part 2. The land shown on Plan 2 below is removed from the Green Belt in Local Plan Part 1. This land will now be within the settlement area of Godalming and is also removed from the Area of Great Landscape Value.'
MM12	Page 13-5	Plan 2	Replace with new Plan 2 showing the area to be removed from the Green Belt in Local Plan Part 1. See end of schedule.
MM12	Page 13-6	Para 13.18	Amend wording to read: ' However, any the detailed boundary changes that might be appropriate are to be considered in more detail will be made in Part 2 of the Local Plan. This will involve consultation with local communities and will also sit side by side with the work being carried out on the relevant Neighbourhood Plans. The exception is land opposite Milford Golf Course, which is

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			removed from the Green Belt in Local Plan Part 1 and is allocated for housing. . This would involve consultation with the local communities and also sit side by side with work being carried out on the relevant neighbourhood plans.'
MM12	Page 13-7	Para 13.21 and Plan 3	Amend final sentence of paragraph 13.21 to read: 'Therefore, at this stage, the existing settlement area is to be removed from the Green Belt (Plan 3) as shown on Plan 3. Plan 3 also shows the broad areas for removal from the Green Belt, with the detailed changes to the extended Green Belt settlement boundary being made in Local Plan Part 2 With any further adjustments to the settlement boundary to be made through Local Plan Part 2 to, hopefully, align with the emerging Neighbourhood Plan.'
MM12	Page 13-7 to 13-8	Plan 3	Replace with new Plan 3 showing broad areas for potential removal from the Green Belt at Chiddingfold.
MM12	Page 13-9	Para 13.22	Amend paragraph to read: ' It is proposed that The Local Plan insets Elstead is inset from the Green Belt, based on the current settlement boundary defined in the 2002 Local Plan. There are some sites considered suitable for meeting future housing needs that would require minor adjustment to the existing settlement boundary. These are indicated on Plan 4. In addition, there may be other suitable sites that will emerge through the Neighbourhood Plan process. The precise definition of the new settlement boundary will be identified in Local Plan Part 2.'
MM12	Page 13-10	Para 13.26	Amend first sentence of paragraph 13.26 to read: 'The Council supports, in principle, changes to the settlement boundaries and the removal of some land from the Green Belt within these broad areas, as indicated on Plan 5.'
MM12	Page 13-10	Para 13.26	Add sentence at end of paragraph to read: ' However, one of the areas opposite Milford Golf Course is capable of making a significant contribution to meeting the Council's housing needs. This has been identified as a Strategic Housing site in Chapter 18. Therefore the area to be removed from the Green Belt in Local Plan Part 1 is shown on Plan 5.'
MM12	Page 13-11 to 13-12	Plan 5	Amended to show change to Green Belt boundary at Milford.

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MM12	Page 18-14	Para 18.11	Amend as follows: The site is currently within the Green Belt, although the The Green Belt Review identifies the potential to inset Milford village within the Green Belt with an amended development boundary. The Council agrees with the Review finding that there is potential for development without significant harm to the designation. As the site is removed from the Green Belt boundary will is to be amended in this plan, through Local Plan Part 2, it is anticipated that this site will be delivered between 2024 and by 2026.
MM12	Page E-1	Appendix E	Add bullet points to the table under 'Changes to Green Belt boundary' as follows: <ul style="list-style-type: none"> • Removal of land between Aaron's Hill and Halfway Lane, Godalming • Removal of Land opposite Milford Golf Course from Green Belt
MM12	Page E-2 to E-3	Appendix E	Map showing removal of area south east of Binscombe boundary from the Green Belt amended to reflect changes in Chapter 13. See below.
MM12	After Page E-4 to E-5	Appendix E	Insert map showing removal of land between Aarons Hill and Halfway Lane, Godalming from the Green Belt and AGLV. See below.
MM12	Page E-9 to E-10	Appendix E	Amend title to read: 'Chapter 13. Rural Environment: Policy RE2 Changes to Green Belt boundary: Removal of Milford and Witley within current Rural Settlement boundary and land opposite Milford Golf Course ' Amend map to include land opposite Milford Golf Course within the area to be removed from the Green Belt. See below.
MM13	Page 13-15	Policy RE2	Amend Policy RE2 to delete the following bullet point after paragraph 3: 'The following changes to the Green Belt are made in this Plan:...' 'Addition of land to the north of Cranleigh and land to the north east of Farnham around Compton.'
MM13	Pages 13-13 to 13-15	Para 13.28 to 13.30 and Plans 6 and 7	Delete section relating to land with potential to be added to the Green Belt. This involves deleting paragraphs 13.28 to 13.30 and Plans 6 and 7. Re-number remaining paragraphs accordingly.

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MM13	Page E-1	Appendix E	Remove bullet point under 'Changes to Green Belt boundary': • Addition of new area(s) to the north of Cranleigh and to the north-east of Farnham, around Compton
MM13	Page E-3	Appendix E	Deletion of Map showing additional Green Belt area to the north of Cranleigh to reflect changes in Chapter 13.
MM13	Page E-4	Appendix E	Deletion of Map showing additional Green Belt area to the north east of Farnham to reflect changes in Chapter 13.
MM14	Page 13-22	Policy RE3	Amend wording of AONB section to read: 'Surrey Hills Area of Outstanding Natural Beauty The character and qualities of the Surrey Hills Area of Outstanding Natural Beauty (AONB) will be protected, including through the application of national planning policies and the Surrey Hills AONB Management Plan). The protection and enhancement of the character and qualities of the Surrey Hills Area of Outstanding Natural Beauty (AONB) that is of national importance will be a priority and will include the application of national planning policies together with the Surrey Hills AONB Management Plan. The setting of the AONB....'
MM14	Page 13-22	Policy RE3	Amend AGLV Section as follows; The same principles for protecting the AONB will apply in the Area of Great Landscape Value (AGLV), which will be retained for its own sake and as buffer to the AONB, until there is a review of the Surrey Hills AONB boundary, whilst recognising that the protection of the AGLV is commensurate with its status as a local landscape designation.
MM14	Page 13-23	Policy RE3	Amend point iv to read: Pending a review of the detailed boundaries in Local Plan Part 2, the Areas of Strategic Visual Importance will be retained. Other than land to the south of Holy Cross Hospital, Haslemere as shown on Plan 9, which will be removed in this Plan.
MM14	Page 13-20	Para13.49 (now 13.46)	Renumber paragraph as 13:47 and amend wording to read: 'Only one of the designated areas, that to the south of Holy Cross Hospital in Haslemere, is considered by the Review to make only a limited contribution due to the already developed nature of this area. It is a wooded area and is not subject to pressure for development. The Council supports the removal of this area from the ASVI.

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			It is therefore proposed that the area of land identified in on Plan 9 be removed from the ASVI. Notwithstanding this, the ASVI is part of a wider area which has been identified as a Special Green Area in the Haslemere Design Statement, which has been adopted by the Council as a material consideration. The Haslemere Neighbourhood Plan is also being prepared, and in order to allow some time for the final determination of the environmental value of the land and its boundaries, the area at Holy Cross should be treated in the same way as the other ASVI areas and retained until Local Plan Part 2, when it can also be reviewed.'		
MM14	Page 13-20	Para 13.50 (now 13.46)	Amend paragraph number and amend wording to read: 'The Review concludes that there are sound reasons for the ASVI designation in these the remaining areas. It'		
MM14	Page 13-21	Plan 9	Delete		
MM14	Page E-1	Appendix E	Remove row from table: <table border="1" style="width: 100%;"> <tr> <td style="width: 30%;">13. Rural Environment/ RE3</td> <td>Local Landscape designations <ul style="list-style-type: none"> Area of Strategic Visual Importance (ASVI): removal of the ASVI south of Holy Cross Hospital, Haslemere </td> </tr> </table>	13. Rural Environment/ RE3	Local Landscape designations <ul style="list-style-type: none"> Area of Strategic Visual Importance (ASVI): removal of the ASVI south of Holy Cross Hospital, Haslemere
13. Rural Environment/ RE3	Local Landscape designations <ul style="list-style-type: none"> Area of Strategic Visual Importance (ASVI): removal of the ASVI south of Holy Cross Hospital, Haslemere 				
MM14	Page E-11	Appendix E	Deletion of map on the removal of the ASVI south of Holy Cross Hospital.		
MM15	Page 16-12	Para 16.33	Amend para as follows: <p>In terms of finding new SANG, the Council has adopted a three-pronged approach –</p> <p>(i) review the potential capacity of Farnham Park;</p> <p>(ii) identify opportunities for new SANG; and</p> <p>(iii) investigate proposals for 'bespoke' SANG in associated with developers' promoted housing sites.</p> <p>As at 19th October 2017, the remaining SANG capacity was sufficient to accommodate a further 1069 dwellings. The local plan strategy allocates 2,780 new homes for the Farnham area. Taking account of sites that already have planning permission (as at 1st April 2017), are allocated in the Farnham Neighbourhood Plan and/or lie outside the SPA's 5 km 'Zone of Influence', a further 1,366 dwellings are expected to be provided between 2017 and 2032. The impact of this 'net' housing figure on the SPA will need the requisite amount of SANG to be identified according to the TBH Delivery Framework formula (see 16.32 above).</p>		

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			Depending on the average occupancy rates of new dwellings this would be between 4.75 ha and 9.14 ha of new SANG.
MM15	Page 16-12	Para 16.34	<p>Amend paragraph as below:</p> <p>The outcome of the Council's application of this approach is detailed in the topic paper on SANG15. This concludes that, New information on visitor capacity has identified on the basis of an enhanced SANG capacity at Farnham Park sufficient to provide mitigation for at least 75% of the Farnham area's net housing requirement as a result of new information on visitor capacity, considerably less new SANG would need to be identified. Subject to Council approval, the enhanced capacity is due to be released in July 2016 and would be sufficient to provide mitigation for at least 75% of the Farnham area's net housing requirement. Current calculations suggest that a maximum of 6.3 ha of new SANG would will need to be identified by the end of the plan period. However, depending on how average occupancy rates of new dwellings vary, there may be sufficient capacity at Farnham Park to accommodate the entire housing requirement.</p> <p>In terms of finding new SANG, the Council has adopted a three-pronged approach –</p> <ul style="list-style-type: none"> (i) continue to review the potential capacity of Farnham Park; (ii) identify opportunities for new SANG; and (iii) investigate proposals for 'bespoke' SANG associated with developers' promoted housing sites.
MM16	Page 17-6	Policy CC2	<p>Add two additional bullet points at the end of Policy CC2:</p> <p>'8. Ensuring that new dwellings shall meet the requirement of 110 litres of water per person per day, and</p> <p>9. requiring that all new buildings are provided with the highest available speed broadband infrastructure.'</p>
MM17	Page 18-1	Para 18.2	<p>Amend fourth and fifth sentence as follows:</p> <p>'In total, these strategic sites are expected to deliver 4,445 4,450 homes over the whole plan period from 2013-3032. As of 1 April 2016 2017, 619 745 dwellings had already received planning permission on the sites, leaving about 3,826 3,705 homes to be delivered over the plan period. Of these 3,826 3,705 homes, it is expected that about 744 935 884 homes would be delivered within the next five years.'</p>

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MM17	Page 18-1 to 18-2	Table 18.1	Update table to reflect the latest Five Year Land Supply data and Examination hearings. See below.
MM18	Page 18-5	Policy SS2	Amend to read ' ...is allocated for around 400 105 homes'.
MM18	Page 18-5	Policy SS2	Amend point c as follows: 'c) The potential for the incidental reuse or working of any underlying mineral resource during the development of the site should be demonstrated to the satisfaction of the mineral planning authority satisfactorily demonstrated '.
MM19	Page 18-7	Policy SS3	Amend criterion a) as follows: ' Comprehensive Redevelopment of the main part of this 'Gateway' site to create a landmark scheme.'
MM20	Page 18-9	Policy SS4	Delete the final sentence of the policy as follows: ' Phase 2 of the development, for around 104 homes, must not commence until Phase 1 (for 149 homes) has been substantially completed. '
MM20	Page 18-9	Para 18.8	Amend second to fourth sentences as follows: 'Phase 2 of the development has the potential to deliver a further 101 housing units but it is not considered suitable for housing development in isolation. In order to achieve sustainable development objectives the suitability of the 'Phase 2' land for development is predicated on the implementation of Phase 1. It is anticipated that this site would be delivered by 2021 2022. '
MM21	Page 8-1	Para 8.3	Water resources supply, sewerage and water quality
MM21	Page 18-12	Policy SS5	Amend criterion f) as follows: 'A holistic and integrated scheme for the whole site that maximises connectivity and delivers the necessary infrastructure and direct access into the village centre. The parts of the site closest to the village centre should be developed first. '
MM21	Page 18-11	Para 18.10	Delete penultimate sentence as follows: ' It will be important that the site is developed in a staged way, with the land closest to the village centre (to the east of Alford Road and west of Knowle Lane) built out first. '
MM22	Page 18-19	Policy SS7	Add the following sentence to second paragraph to read: '...appropriate to a settlement of this size. The development should fully recognise the significance of the heritage value of the site and conserve the site's heritage assets in a manner appropriate to their significance. '

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Mod No.	Document Page no.	Para/ Policy	Modified text (deleted text shown as struck through and additional text shown in bold)
MM22	Page 18-19	Policy SS7	Add a new third paragraph to Policy: 'The setting of the Surrey Hills Area of Outstanding Natural Beauty will be protected, in accordance with Policy RE3.'
MM22	Page 18-19	Policy SS7	Amend criterion a) as follows: 'Up to About 2,600 homes to be delivered by 2032.' Delete final sentence of policy.
MM22	Page 18-19	Policy SS7	Amend criterion i) to read: "Necessary highways improvements to adequately mitigate the likely impacts, including cumulative impacts , of the proposed development on both the safe operation and the performance of the surrounding road network'
MM22	Page 18-19	Policy SS7	Amend criterion j) to read: 'A package of sustainable transport measures, including a frequent bus service to be provided and secured in perpetuity to serve the whole site , to maximise opportunities for alternative forms of transport and to support alternatives to the private car'.
MM22	Page 18-20	Policy SS7	Delete final sentence: 'The Council would expect a comprehensive masterplan to be produced to inform the delivery and phasing of the development.'
MM22	Page 5-6	Para 5.24 (formerly 5.23)	Amend first sentence to read 'It is considered that, subject to the necessary infrastructure being provided, including highways improvements and public transport provision in perpetuity , the benefits...' Amend second sentence to 'It is therefore allocated in this Plan as a strategic site for a new settlement of up to 2,600 homes, employment and associated supporting uses'. Amend third sentence to 'Policy guidance on this site is set out in Policy ALH1 'The Amount and Location of Housing' in Chapter 6 and in Policy Policies SS7 and SS7A in Chapter 18...'
MM22	Page 6-5	Para 6.21	Amend second sentence to read 'The Council considers that the site should be allocated as a new settlement in the Local Plan for up to 2,600 homes and additional supporting uses subject to infrastructure and transport issues being satisfactorily addressed. '
MM22	Page 18-17	Para 18.17	Amend second sentence as follows: 'Dunsfold Aerodrome is therefore allocated as a strategic site for up to about 2,600 homes...'
MM22	Page 18-17	Para 18.18	Amend sentence to 'The delivery of up to about 2,600 homes...'

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Mod No.	Document Page no.	Para/ Policy	Modified text (deleted text shown as struck through and additional text shown in bold)
MM22	Page 18-18	Para 18.20	Amend penultimate sentence as follows: 'The district / local centre must be designed in such a way that the facilities can be expanded in the event that when the new settlement extends to 2,600 homes later in the plan period.'
MM22	Page 18-18	Para 18.22	Amend first sentence as follows: 'In addition, a range of sustainable transport measures should be implemented, including improvements to local bus routes (including a bus service to be provided and secured in perpetuity) ; travel plans...'
MM23	Page 18-20 to 18-24	New policy SS7A	<p>Insert new supporting text and policy as follows:</p> <p>Policy SS7A: Dunsfold Aerodrome Design Strategy</p> <p>18.27 Policy SS7: New settlement at Dunsfold Aerodrome allocates the site for mixed use strategic development to accommodate housing, employment and associated supporting uses. It requires that a new settlement is formed, creating a high quality, mixed use community with its own identity and character.</p> <p>18.28 The NPPF recognises that well-designed buildings and places can improve the lives of people and communities (paragraph 8). The promotion of high quality design is a core planning principle (paragraph 17), and is given great importance in Section 7 of the Framework. Good design is a key aspect of sustainable development and should contribute positively to making places better for people. The Framework sets out the importance of planning positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes (paragraph 57). Further design guidance is provided by the National Planning Practice Guidance (PPG).</p> <p>18.29 As a new settlement which will be delivered over the length of the plan period, ensuring continued high quality design and place-making is integral to its success in creating a new community. Policy SS7A: Dunsfold Aerodrome Design Strategy complements the site allocation, setting out the mechanism through which the Council will promote and control the design-led development of the new settlement. The policy sets out:</p> <ul style="list-style-type: none"> • overarching design principles to ensure a successful place is created; and • the requirement for the developer to produce a comprehensive Masterplan for the site that would adhere to the design principles set out within this policy and be subject to design

Schedule of Proposed Main Modifications to Local Plan Part 1

Mod No.	Document Page no.	Para/ Policy	Modified text (deleted text shown as struck through and additional text shown in bold)
			<p>review.</p> <p>Policy SS7A: Dunsfold Aerodrome Design Strategy</p> <p>Dunsfold Aerodrome New Settlement will be a high quality design-led new Surrey village for the 21st Century, a place where residents choose to live, work and visit.</p> <p>The following are the key design principles which will guide the future development of Dunsfold Aerodrome. In addition to Policy TD1, all proposals for the development of Dunsfold Aerodrome shall clearly demonstrate how it achieves the following strategic design principles:</p> <p>i. A village that has a distinct local character:</p> <p>The new development will be of a high quality and inclusive design, creating a locally distinctive and legible³ place that responds to the previous use of Dunsfold Aerodrome as an airfield.</p> <p>[Footnote 3 to read: A legible place is one that has a clear image and is easy to understand (By Design, CABI, 2000)]</p> <p>The development of a new community at Dunsfold Aerodrome provides an opportunity to draw upon the contribution made by the historic environment to create a unique sense of place and local character for the new settlement. Both the physical and social legacy features of the airfield should be incorporated into the Masterplan to root the development into its context and site history.</p> <p>In addition the Masterplan will demonstrate how the development responds to the landscape setting within which it sits and how the features and layout are reflective of the site's character and the wider local area. It will set out the urban design principles which have directly influenced the design and layout of the proposals that contribute towards creating a unique new community.</p> <p>Inspired by the variety found within the Surrey vernacular, the new settlement will incorporate visual richness and character in a harmonious and coordinated approach. This will create a distinctive place, responsive to both the immediate and wider context.</p>

Schedule of Proposed Main Modifications to Local Plan Part 1

Mod No.	Document Page no.	Para/ Policy	Modified text (deleted text shown as struck through and additional text shown in bold)
			<p>Where possible the Masterplan will set out how the new settlement will prevent a homogenous design aesthetic ensuring that the new settlement is both grounded into the site and reflects the traditional evolution of a village.</p> <p>Buildings should be well designed and adaptable to future changes in circumstance and demands.</p> <p>Overall the Masterplan will need to demonstrate how it will deliver a quality place where residents chose to live, which is attractive to employers and employees, together with the visitors who chose to come to Dunsfold Aerodrome to enjoy the range of retail and leisure activities.</p> <p>ii. Safe, connected and efficient streets:</p> <p>The Masterplan will incorporate an attractive network of streets that support the character of a new Surrey village, responding to the local public spaces in the village centre and creating safe, enjoyable and accessible spaces within the residential neighbourhood. The layout and design will help to create safe well-connected neighbourhoods, and have particular regard for ensuring that proposals maximise opportunities to prioritise pedestrian and cyclist movement across the site and further afield. It is essential that the layout and design incorporates the principles of both legibility and permeability to ensure that everyone can move freely and confidently through the area.</p> <p>iii. A significant network of greenspaces and public places:</p> <p>The amount, variety and quality of landscaped open space is one of the key elements which will make the new settlement special. The Masterplan will outline the approach for a connected network and hierarchy of Green Infrastructure, open spaces and recreational facilities. These spaces should be accessible to all, ranging from pocket parks and doorstep play to sports pitches, playgrounds and public parks, and should link coherently into the existing tree belts and retained hedgerows. They will respect and enhance the landscape qualities of the area, meet the needs of the new community and be within walking distance of residential neighbourhoods. Additionally these spaces should be durable, safe and convenient and capable of long-term sustainable management without undue cost to the community.</p>

Schedule of Proposed Main Modifications to Local Plan Part 1

Mod No.	Document Page no.	Para/ Policy	Modified text (deleted text shown as struck through and additional text shown in bold)
			<p>The Masterplan will include a network of public spaces at various scales and with different characters and intended uses, creating a series of everyday spaces in which people will live out their communal lives. These spaces will deliver a rich and varied public realm giving a strong sense of place, unique and distinctive to the new settlement.</p> <p>iv. A secure environment:</p> <p>While ensuring that the new settlement is laid out in a permeable manner to encourage walking and cycling to all the main facilities, the network of routes and design of building frontages should be laid out in a way that creates a safe environment, and reduces the opportunities to commit crime.</p> <p>v. A choice of access and inclusive communities:</p> <p>The new development will create an inclusive and sustainable community, which is compact, scaled for the pedestrian, and provides alternatives to the private car. Accessibility across the site will be inclusive to respond to the requirements of its users and residents and provide a choice of routes. The masterplan will encourage smarter transport choices to meet the needs of the new development and maximise the opportunities for sustainable travel, including the provision of a network of footpaths and cycleways, open spaces and water corridors including the Wey and Arun Canal.</p> <p>vi. An efficient use of natural resources:</p> <p>Innovative technologies for water energy and waste (including the storage of waste) will be encouraged to ensure the efficient use of natural resources. Opportunities for promoting adaptable buildings, using sustainable materials and designing building, services and site layouts solutions which emphasise durability will be encouraged. The Masterplan will demonstrate how this can be seamlessly integrated into the development.</p> <p>The layout and design of the new settlement will also need to ensure that it takes into account and effectively mitigates a number of potential environmental impacts, including noise, light pollution, and air quality within the site.</p> <p>vii. Cohesive and vibrant neighbourhoods:</p>

Schedule of Proposed Main Modifications to Local Plan Part 1

Mod No.	Document Page no.	Para/ Policy	Modified text (deleted text shown as struck through and additional text shown in bold)
			<p>The Masterplan will show that the new development will be compact and scaled for the pedestrian, distinctive in character, delivering a mix of uses, different types of dwellings (both in size and tenure), and a village centre with supporting social and physical infrastructure. It will be a cohesive and vibrant new village created through a range of individually defined character neighbourhoods that compliment each other on the larger scale.</p> <p>Dunsfold Aerodrome will not only be constructed over a long period of time, but the completed development will be expected to endure over the long term. This means that the buildings and spaces should be designed to be sufficiently flexible to respond to changing circumstances.</p> <p>The Masterplan</p> <p>The developer must produce a Masterplan for the overall site that will respond to the design principles set out in this policy. This Masterplan should:</p> <ul style="list-style-type: none"> • be subject to a public consultation (the strategy for this to be agreed in advance with the Council); • be assessed by a Design Review Panel; • be approved by the Council as part of any planning consent. All subsequent planning applications for parts of the Dunsfold site shall be consistent with the approved masterplan; • detail design principles and character areas (including density, scale, car parking) for the entire site and the phases of development; and • be kept under review by site developers and any changes approved by the Council alongside the planning applications that rely on those changes. <p>To ensure that the design strategy for the site is implemented, maintained and developed in accordance with the needs of those using and living on the site, the Masterplan will include details in respect of the delivery, management and governance of the new settlement. It will identify the mechanisms for the management of social infrastructure and will demonstrate how the design facilitates the consideration of further development on the site beyond the plan period.</p> <p>At each phase of the development the Design and Access Statement accompanying the</p>

Schedule of Proposed Main Modifications to Local Plan Part 1

Mod No.	Document Page no.	Para/ Policy	Modified text (deleted text shown as struck through and additional text shown in bold)
			<p>planning applications should include a compliance statement that demonstrates how the proposals accord with the principles set out in the Masterplan. This should also be subject of design review.</p> <p>The use of a Design Review Panel throughout the planning and development process will ensure that the expectations and aspirations for the site are realistic, achievable and will provide a framework to develop a high quality, design-led and sustainable new village.</p>
MM23	Pages F-13	Appendix F	<p>Add under Strategic Housing Sites new row below SS7: 'SS7A: Dunsfold Aerodrome Design Strategy.'</p>

Schedule of Proposed Main Modifications to Local Plan Part 1

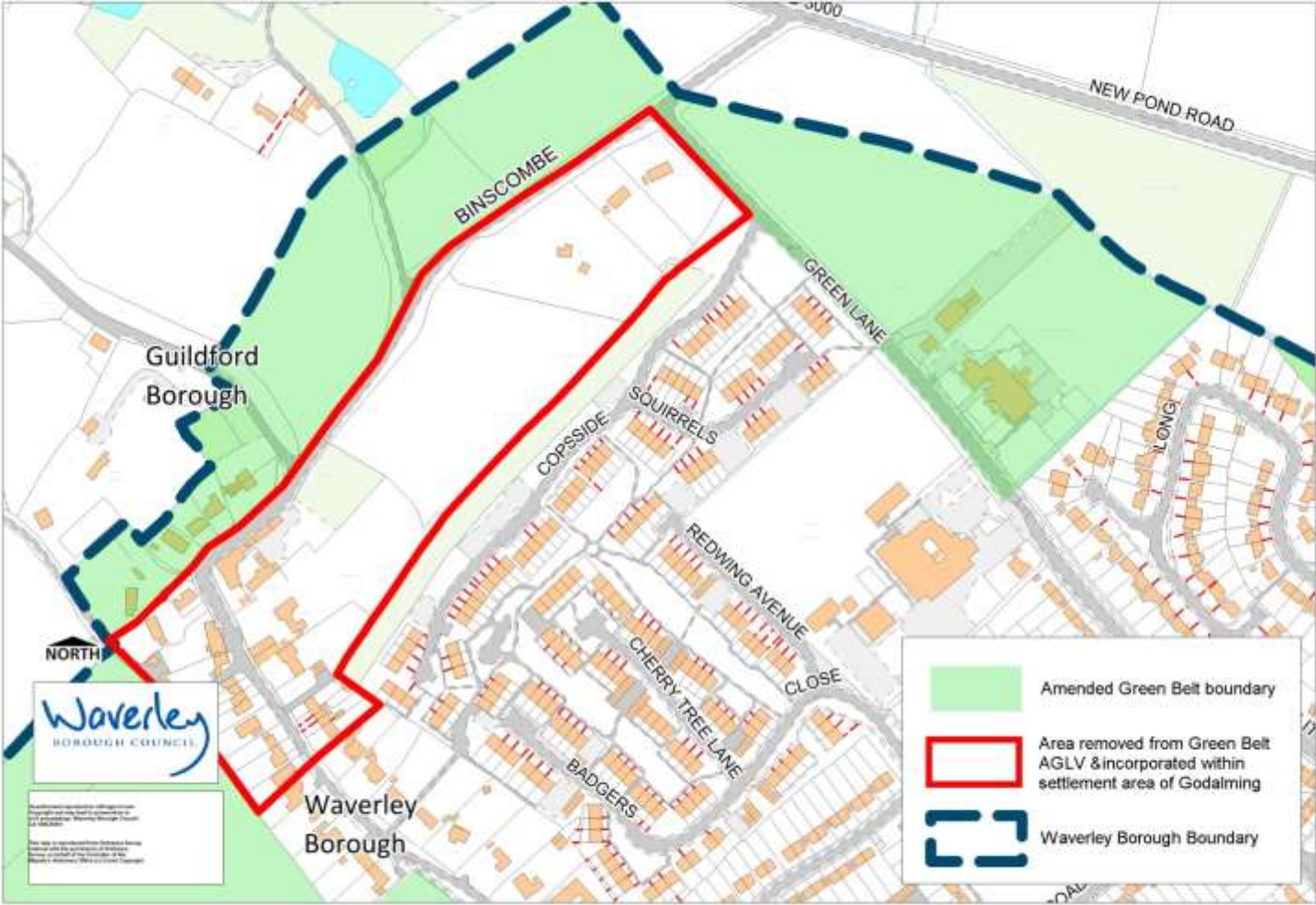
Table 6.1 – Potential Housing Land Supply (as at April ~~2016~~ **2017**)

Component	Dwellings	Notes
A) Housing required 2013 - 2032 to meet objectively assessed needs	11,210 9,864	519 590 x 19 years
B) Homes completed 2013 to 2016 2017	727 1,048	
C) Estimated supply from existing planning permissions (at 1 April 2016 2017)	2,579 3,059	
D) Resolutions to permit	445	
E) Windfall estimate for sites of 1 – 4 dwellings	450 468	Equivalent to 35 39 dwellings a year from 2019 2020 to 2032
F) Windfall estimate for sites of 5 or more dwellings	550 494	Equivalent to 92 99 dwellings a year from 2026 2027 to 2032
G) New settlement at Dunsfold Aerodrome	2,600	
H) Other strategic allocations ¹	1,226 740	
I) Allocations in the Farnham NDP not accounted for in other figures	175	
J) Housing from suitable LAA sites and allocations in LPP2 and NDPs , to deliver residue of 6,925 8,260 homes allocated to parishes in Policy ALH1	1,729 2,181	6,925 3,970 (commitments in these settlements) — 1,226 (strategic allocations)
K) Total (B) to (J)	9,864 11,210	
Shortfall	0	

¹ Excluding those sites with a planning permission, in whole or part, as of 1 April ~~2017~~ **2016**.

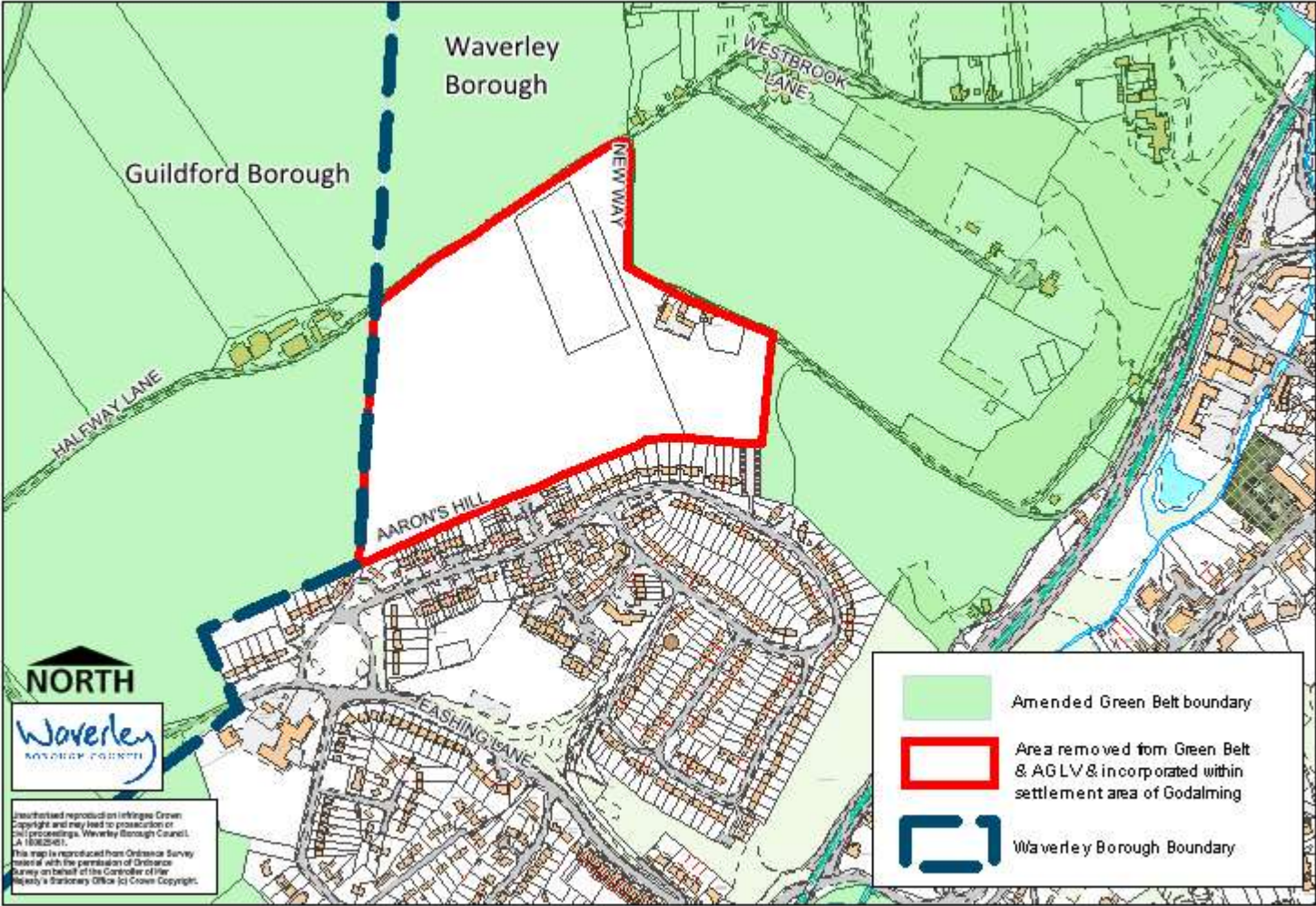
Schedule of Proposed Main Modifications to Local Plan Part 1

Plan 1. Removal of land south east of Binscombe, Godalming (and identical map in Appendix E)



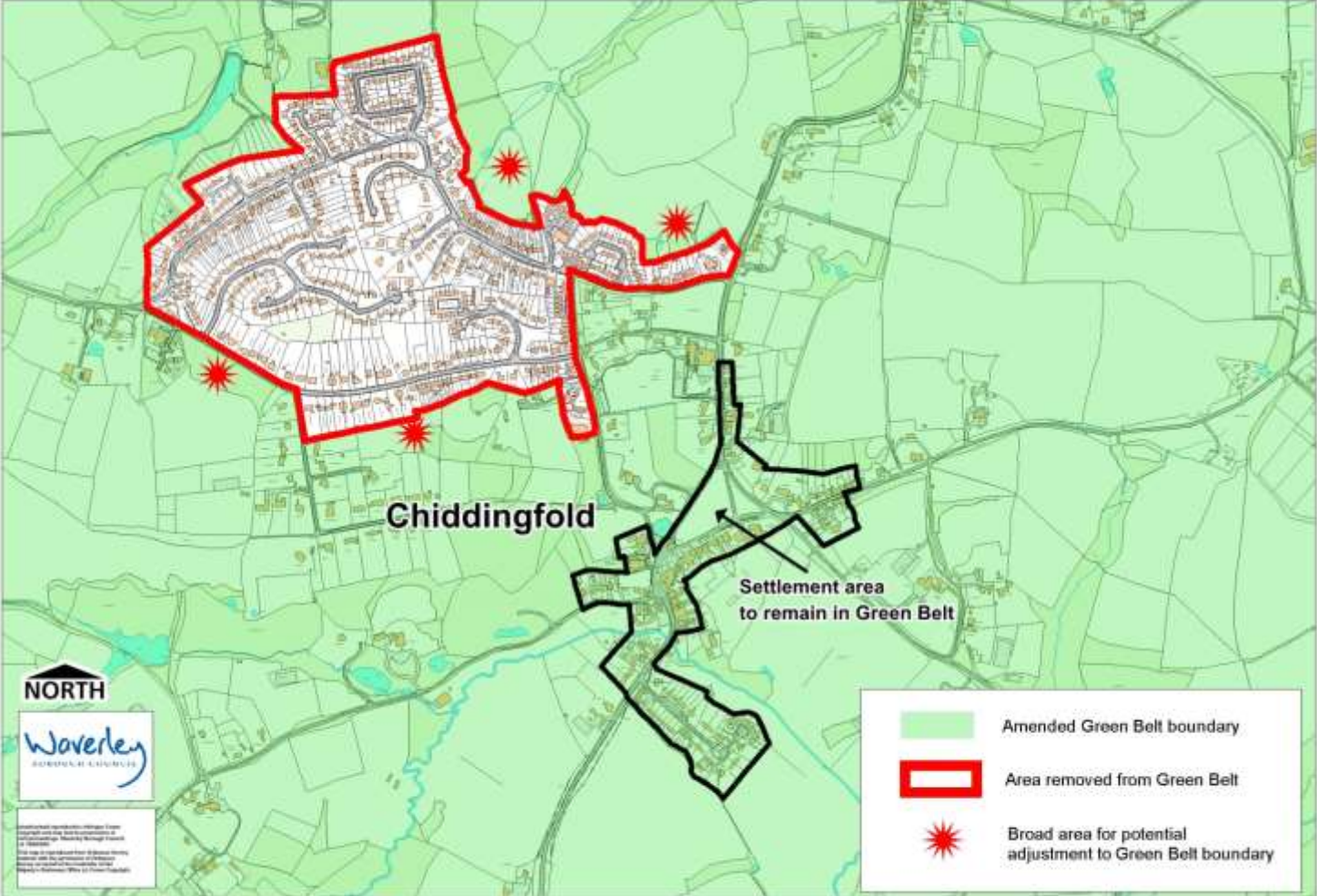
Schedule of Proposed Main Modifications to Local Plan Part 1

Plan 2. Removal of land between Aaron's Hill and Halfway Lane, Godalming (and identical map in Appendix E)



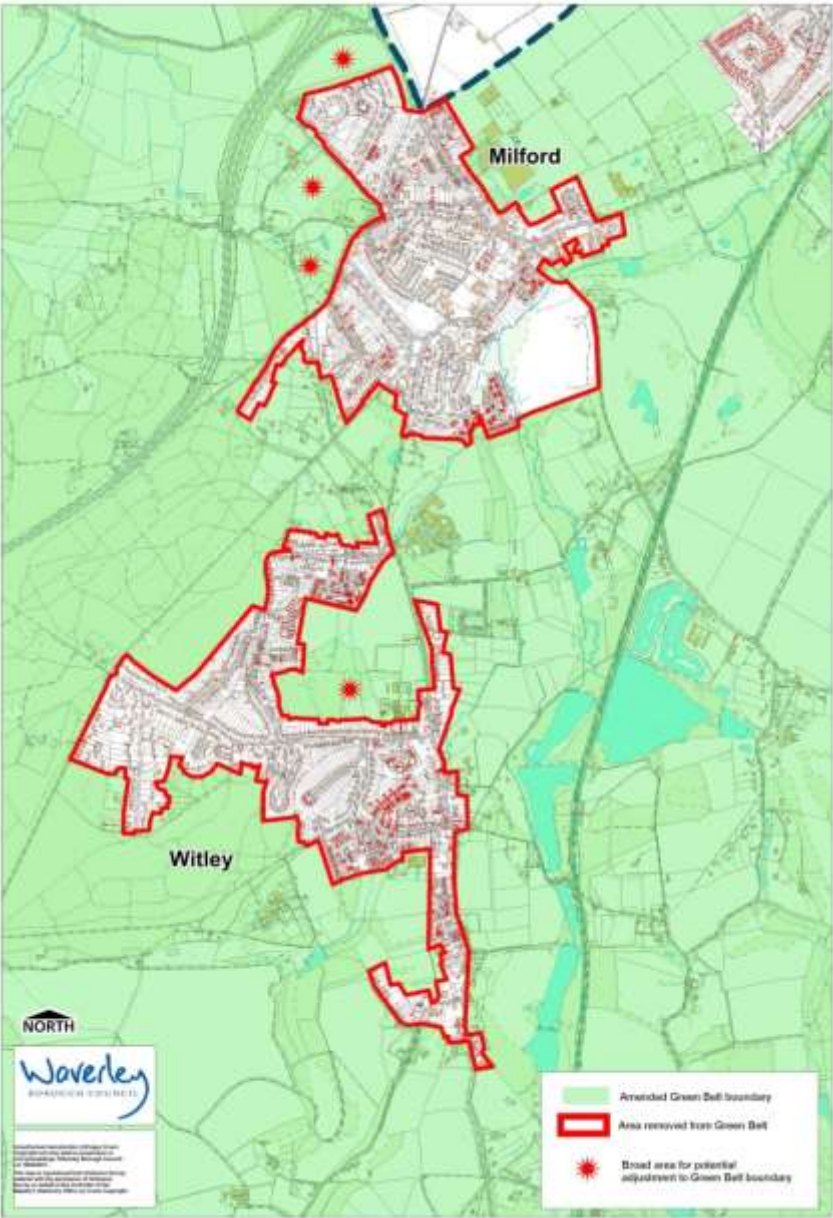
Schedule of Proposed Main Modifications to Local Plan Part 1

Plan 3. Removal of land within Chiddingfold from Green Belt



Schedule of Proposed Main Modifications to Local Plan Part 1

Plan 5. Removal of land within Milford and Witley from Green Belt



Schedule of Proposed Main Modifications to Local Plan Part 1

Table 18.1 – Expected housing delivery on strategic sites

Policy	Strategic Site address	Total dwellings	Dwellings permitted at 01.04.16-17	Outstanding dwellings	Years 1-5 (2016/17 – 2017/18 2020/21 2021/22)	Years 6-10 (2021/22 2022/23 - 2025/26 2026/27)	Years 11+ (2026/27 2027/28 - 2031/32)
SS1	Coxbridge Farm, Farnham	350	0	350	120 480	230 470	0
SS2	Green Lane, Badshot Lea, Farnham	105 400	0	105 400	105 400	0	0
SS3	Woolmead, Farnham	100	96 45	4 55	0 55	4 0	0
SS4	Land at Horsham Road, Cranleigh	250	149	101	101	0	0
SS5	Land South of Elmbridge Road and the High Street, Cranleigh	765	500 425	265 ¹ 340	85 75	180 265	0
SS6	Land opposite Milford Golf Club Course, Milford	180	0	180	100 480	80 0	0
SS7	Dunsfold Aerodrome	2600	0	2,600	273 430	1,285 4470	1,042 4300
SS8	Woodside Park, Godalming	100	0	100 ²	100	0	0
		4,450 4,445	745 649	3,705 3,826	884 935	1,779 1,592	1,042 4300

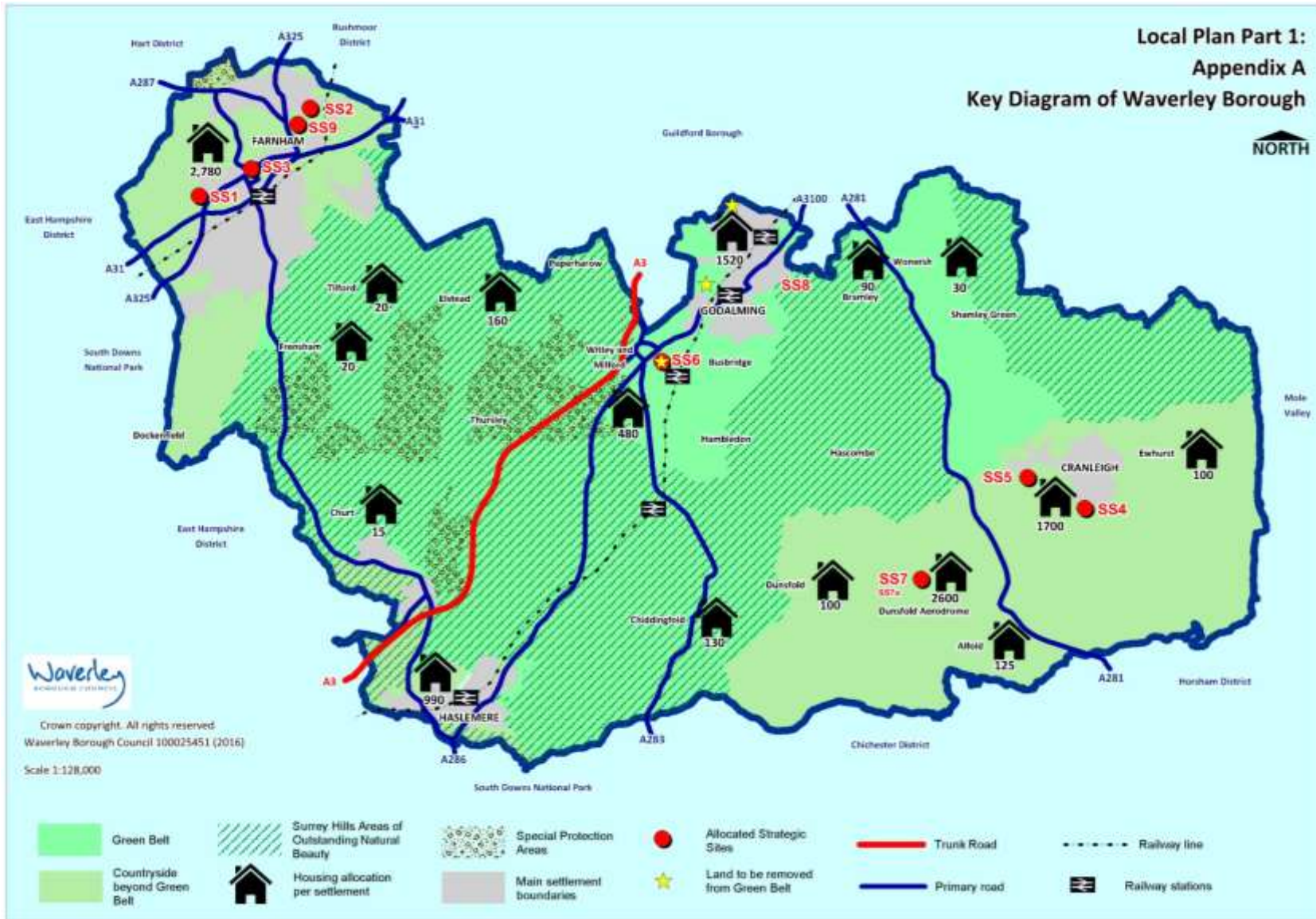
New footnotes:

1. Resolution to permit 265 dwellings issued on 15/03/17 (WA/2016/2207).
2. Resolution to permit 100 dwellings issued on 28/02/17 (WA/2016/1418).

Schedule of Proposed Main Modifications to Local Plan Part 1

Appendix A – Key Diagram of Waverley Borough

Schedule of Proposed Main Modifications to Local Plan Part 1



Appendix C – Housing Trajectory 2013-2032

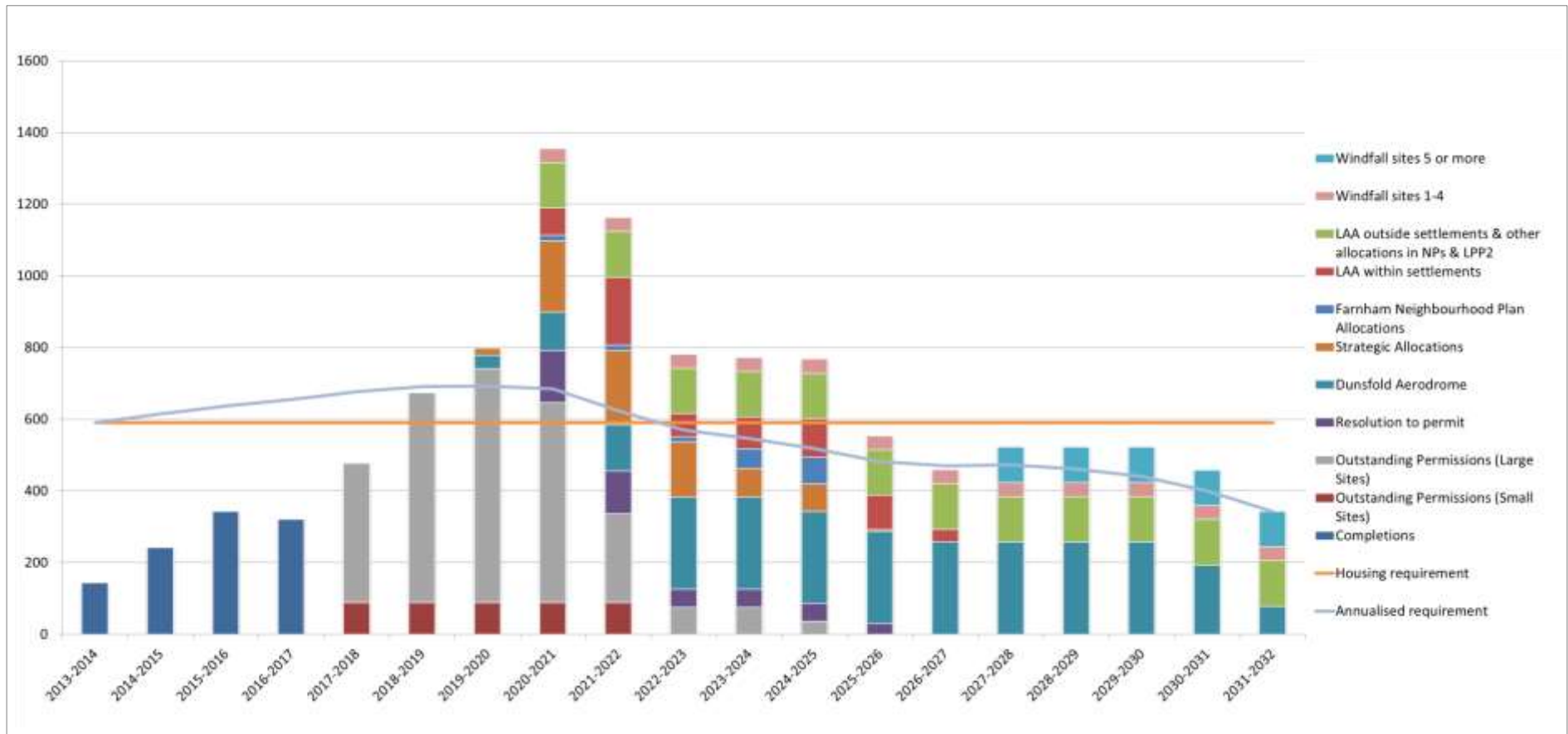
Schedule of Proposed Main Modifications to Local Plan Part 1

TOTALS Source of supply:	2013- 2014	2014- 2015	2015- 2016	2016- 2017	2017- 2018	2018- 2019	2019- 2020	2020- 2021	2021- 2022	2022- 2023	2023- 2024	2024- 2025	2025- 2026	2026- 2027	2027- 2028	2028- 2029	2029- 2030	2030- 2031	2031- 2032	Totals
Completions	143	242	342	321																1,048
Outstanding Permissions (Small Sites)					87.4	87.4	87.4	87.4	87.4											437
Outstanding Permissions (Large Sites)					390	586	653	559	248	75	75	36								2,622
Resolution to permit					0	0	0	145	120	50	50	50	30							445
Dunsfold Aerodrome							37	107	129	257	257	257	257	257	257	257	257	193	78	2,600
Strategic Allocations							20	199	207	154	80	75	5							740
Farnham Neighbourhood Plan Allocations								15	15	15	55	75								175
LAA within settlements								76	189	64	89	108	95	35						656
LAA outside settlements & other allocations in NPs & LPP2								127.1	127.1	127.1	127.1	127.1	127.1	127.1	127.1	127.1	127.1	127.1	127.1	1,525
Windfall sites 1-4								39	39	39	39	39	39	39	39	39	39	39	39	468
Windfall sites 5 or more															98.8	98.8	98.8	98.8	98.8	494
Total Supply	143	242	342	321	477.4	673.4	797.4	1,354.5	1,161.5	781.1	772.1	767.1	553.1	458.1	521.9	521.9	521.9	457.9	342.9	11,210

	2013- 2014	2014- 2015	2015- 2016	2016- 2017	2017- 2018	2018- 2019	2019- 2020	2020- 2021	2021- 2022	2022- 2023	2023- 2024	2024- 2025	2025- 2026	2026- 2027	2027- 2028	2028- 2029	2029- 2030	2030- 2031	2031- 2032
Year	19	18	17	16	15	14	13	12	11	10	9	8	7	6	5	4	3	2	1
Cumulative supply	143	385	727	1048	1525	2199	2996	4351	5512	6293	7065	7833	8386	8844	9366	9888	10409	10867	11,210
Housing requirement	590	590	590	590	590	590	590	590	590	590	590	590	590	590	590	590	590	590	590
Cumulative requirement	590	1180	1170	2360	2950	3540	4130	4270	5310	5900	6490	7080	7670	8260	8850	9440	10030	10620	11210
Residual	11067	10825	10483	10162	9685	9011	8214	6859	5698	4917	4145	3378	2824	2366	1844	1323	801	343	0
Annualised requirement	590	615	637	655	677	692	693	684	624	570	546	518	483	471	473	461	441	400	343
Shortfall from start of plan period	447	795	1043	1312	1425	1341	1134	369	-202	-393	-575	-753	-716	-584	-516	-448	-379	-247	
Annual shortfall/surplus	-447	-348	-248	-296	-113	83	207	765	572	191	182	177	-37	-132	-68	-68	-68	-132	
Cumulative shortfall/surplus	-447	-795	-1043	-1312	-1425	-1341	-1134	-369	202	393	575	753	716	584	516	448	379	247	
Base 5 Year Requirement	2,950	2,950	2,950	2,950	2,950	2,950	2,950	2,950	2,950	2,950	2,950	2,950	2,950	2,950					
With shortfall/surplus	3,397	3,745	3,993	4,262	4,375	4,291	4,084	3,319	2,748	2,557	2,375	2,198	2,234	2,366					
With 5% buffer	3,567	3,932	4,193	4,475	4,593	4,506	4,288	3,485	2,885	2,685	2,493	2,307	2,346	2,458					
Adjusted annual requirement (5 year)	713	786	839	895	919	901	858	697	577	537	499	461	469	497					
5 Year supply	2,056	2,611	3,624	4,464	4,768	4,867	4,836	4,035	3,332	3,072	2,822	2,577	2,482	2,367					
Years Supply	2.9	3.3	4.3	5.0	5.2	5.4	5.6	5.8	5.8	5.7	5.7	5.6	5.3	4.8					

Housing Trajectory (base date 1 April 2016 2017)

Schedule of Proposed Main Modifications to Local Plan Part 1



Appendix D – Explanation of the Parish Housing Allocation Figures in Policy ALH1

Schedule of Proposed Main Modifications to Local Plan Part 1

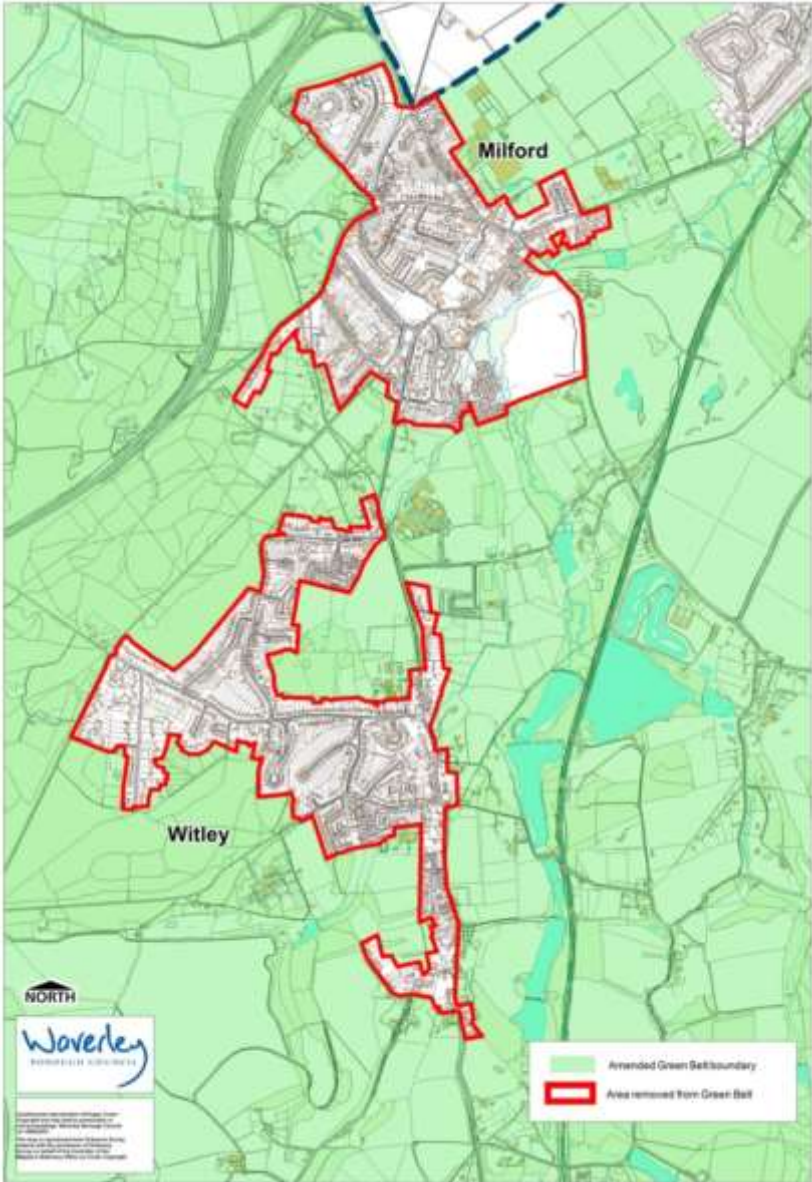
The table below sets out the components of the housing land supply that have informed the housing allocations for each parish given in Chapter 6. To avoid double counting, the 'outstanding dwellings on strategic sites (including Neighbourhood Plan allocations)' excludes dwellings permitted as of 1 April 2016 ~~2017~~.

Parishes	Completions 13-17 A	Outstanding Permissions (Including resolutions to permit) B	Windfalls C	Total Commitments (Completions, Permissions and Windfalls) D (Total of A-C)	Outstanding Dwellings on Strategic Sites (Including Neighbourhood Plan Allocations) E	Total Commitments and Allocations (D+E) F	LAA within settlements G	Housing from LAA sites outside settlements & allocations in NPs and LPP2 H	Local Plan allocation in Policy ALH1 I
Main settlements									
Farnham	300	981	280	1561	634	2195	8	577	2780
Godalming	364	558	246	1168		1168	58	294	1520
Haslemere	131	269	178	578		578	200	212	990
Cranleigh	73	1222	70	1365	101	1466	118	116	1700
Large Villages									
Bramley	9	57		66		66		24	90
Elstead	12	81		93		93		67	160
Milford/Witley	19	46		65	180	245	22	213	480
Chiddingfold	8	11		19		19		111	130
Small Villages									
Alfold	11	73		84		84		41	125
Churt	5	11		16		16			15
Dunsfold		49		49		49		51	100
Ewhurst	4	36		40		40		60	100
Frensham	8	13		21		21		-1	20
Tilford	2	14		16		16		4	20
Wonersh & Shamley Green	9	19		28		28		2	30
Other Villages	93	64		157		157		3	160
Village windfalls			188	188		188		2	190
Dunsfold Aerodrome					2600	2600			2600
Totals	1048	3504	962	5514	3515	9029	406	1775	11210

Schedule of Proposed Main Modifications to Local Plan Part 1

Appendix E – Changes to Green Belt boundary: Removal of Milford and Witley within current Rural Settlement boundary and land opposite Milford Golf Course.

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Waverley Borough Local Plan Part 1: Strategic Policies and Sites

Schedule of Minor Non-Material Modifications

For information only

Introduction

Waverley Borough Council submitted its Local Plan Part 1: Strategic Policies and Sites for Examination in December 2016. Following the Examination Hearings (which took place in June/July 2017) the Council prepared some Main Modifications to the Plan for public consultation. Main Modifications are changes, additions or deletions to make the plan 'sound', and were prepared in liaison with the Planning Inspector who conducted the Examination.

Alongside the Main Modifications, the Council has produced this schedule of Minor Non-Material Modifications. These are published for information only as they do not affect the soundness of the Plan.

Where text has been changed, deleted text is shown as ~~struck through~~ and additional text is shown in **bold**.

Please note that the page numbers given in the table below relate to the Tracked Changes Modifications version.

For information only

Schedule of Proposed Minor Non-Material Modifications to Local Plan Part 1

Page 91

Document Page no.	Para/ Policy	Modified text (deleted text shown as struck through and additional text shown in bold)	Reason for modification	Source of modification
Front page		Update cover of Plan as necessary, e.g. adoption date.	Update	Waverley BC
Page 1-1	1.2	Amend seventh sentence to read: 'Local Plan Part 2, which is to follow, will contain development management policies, and site allocations and land designations.'	Grammar	Waverley BC
Page 1-3	1.16	Change final sentence to read: 'It is responsible for preparing a Minerals and Waste Plan whose site allocations and safeguarding areas are required to be shown on the Borough Council's Adopted Policies Proposals Map.'	Minor wording change needed as a correction	Waverley BC
Page 1-4	Section title	Change title to read 'Local Economic Partnerships'	Factual correction	Waverley BC
	New paragraph 1.21	Local Nature Partnerships (LNPs) are partnerships of a range of local organisations, businesses and people who aim to help bring about improvements in their local natural environment, by taking a strategic view of the challenges and opportunities involved for the benefit of nature, people and the economy. Establishing LNPs was a commitment of the Natural Environment White Paper of 2011. The NPPF affords them a role as a collaborative partner to assess existing and potential components of ecological networks (para. 165). The Surrey Nature Partnership covers the borough of Waverley.	Local Enterprise Partnerships receive due recognition with their own paragraph, therefore why is this not similarly extended to Local Nature Partnerships?	Surrey Wildlife Trust (Comment ID 939)
Page 1-4	Para 1.21	Re-number to become para 1.22.	As a consequence of above.	
Page 1-4	Para 1.22 (formerly 1.21)	Amend second and third sentence to read: 'The ways in which each policy will be delivered are set out under each policy in a delivery and monitoring box. Chapter 19 deals with monitoring and implementation and Appendix F E sets out the Monitoring Framework.'		Waverley BC
Page 2-1	Para 2.1	Amend to read: 'Waverley Borough has a population of 121,272 ¹ and is located in the south west corner of Surrey. It is predominantly rural and extends to around 345 sq kms (133 square miles).'	Typo/Consistency	Waverley BC
Page 2-1	Para 2.3	Amend to read: 'It has a historic core, and Nairn and Pevsner referred to the quality of both Castle Street and West Street as "superb Georgian set-pieces" in their his book Buildings of England:	Accuracy	Waverley BC

¹ Population Density: Census 2011 (Table QS102EW)

Schedule of Proposed Minor Non-Material Modifications to Local Plan Part 1

		Surrey (1962).'		
Page 2-2	Para 2.4	Amend second sentence to read: 'Each has an historic core...'	Grammar	Waverley BC
Page 2-4	Para 2.9	Amend second sentence to read: 'Historically there have been capacity issues at some of these schools and in Farnham there is continuing pressure on secondary school places.'	Clarity	Waverley BC
Page 2-4	Para 2.10	Amend to read 'There is are also a large number of private schools spread across the area.'	Grammar correction	Waverley BC
Page 2-5	Para 2.13	Amend to read: 'There are also three Special Protection Areas (SPAs) designated under the European Birds Directive as being of importance for their populations of the woodlark, nightjar and Dartford warbler.; These are the Thursley, Hankley...'	Grammar	Waverley BC
Page 2-5	Para 2.18	Amend second sentence to read: ' In addition, there are 23 Scheduled Ancient Monuments in the Borough, together with 39 44 County defined Sites of Archaeological Importance. '	Factual correction	Waverley BC (information provided by Surrey CC)
Page 2-8	Para 2.28	Amend penultimate line in paragraph: 'There is therefore a need for more affordable housing across the Borough and policies to address this and other housing needs, including those of Gypsies, Travellers and Travelling Showpeople can be found in Chapter 9.'	Clarity	Surrey Gypsy and Traveller Communities
Page 2-9	Para 2.34	Amend last line to read: '.....affect Waverley include Whitehill/Bordon 'Eco Town' ' Green Town ', the'	Factual correction	East Hants District Council (Comment ID846)
Page 2-9	Para 2.37	Amend first sentence to read: 'Recreation facilities include the Council's own sports centres which include a swimming pool, in each of the four main settlements...'	Grammar	Waverley BC
Page 2-10	Para 2.40	Insert new line after 'Frensham Common'. 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. Other facilities include.....'	This wording was included at the request of the South Downs National Park in the Spatial Strategy of the withdrawn Core	Haslemere Society (Comment ID 884)

Schedule of Proposed Minor Non-Material Modifications to Local Plan Part 1

			Strategy, but had not been included in the new Local Plan.	
Page 3-1	Para 3.1	Amend to: 'The Local Plan looks forward to an end date of 2032. The Local Plan looks forward 15 years from the anticipated date of adopted. The end date is therefore 2032.'	Update	Waverley BC
Page 3-1	Para 3.2 Bullet point 5	New penultimate sentence 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, health and cultural needs of the community.'	A fuller description of the needs of a community recognizing the importance of health.	Guildford and Waverley Clinical Commissioning Group, (1398)
Page 3-1	Para 3.2 Bullet point 5	New final sentence to read: 'A new Cultural Strategy for 2016-2026 is expected to be adopted in 2017.'	To include reference to additional key WBC strategy.	(Farnham Theatre Association, 1095)
Page 3-1	Para 3.2 Bullet point 5	Further update to above: 'A new Cultural Strategy for 2016-2026 has been is expected to be adopted in 2017.'	Factual update	Waverley BC
Page 3-1	Para 3.2 Bullet point 9	Amend final sentence: 'In local and village centres, shops that meet local needs will have been supported.'	Grammar	Waverley BC
Page 3-2	Para 3.2 Bullet point 12	Add to second sentence 'Where new development could potentially have had an adverse effect on biodiversity, measures will have been taken to ensure that the impact is either avoided or mitigated and where necessary compensated for' .	Accuracy	(Surrey Wildlife Trust, 940); (Surrey Nature Partnership, 1002)
Page 4-1	Objective 9	Split Objective into two as follows: '9. To provide appropriate protection to the hierarchy of national and local landscape designations in Waverley, including the Surrey Hills Area of Outstanding Natural Beauty. 10. To deliver a balance of housing and employment growth that takes account of both the need for additional housing and the need to maintain Waverley's economic prosperity.' Re-number remaining objectives accordingly.	Clarity	Internal

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Page 4-2	Objective 12 (now 13)	Amend end of paragraph toincluding older people, first time buyers and Gypsies, Travellers and Travelling Showpeople.	Minor wording changes to identify the needs of the travelling community	Surrey Gypsy and Traveller Communities Forum, 878).
Page 4-2	Objective 16 (now 17)	'To safeguard and enhance the rich historic heritage and the diverse and attractive landscapes and townscapes in Waverley, and to ensure that new development takes proper account of the character and distinctiveness of the area in which it is located'	NPPF does not use the word rich to describe heritage assets. Wording improves readability of the objective.	PLOT Farnham [1450]
Page 5-3	Para 5.10	Add in text as follows: (including villages like Alfold (including Alfold Crossways) and Ewhurst).	In line with Settlement Hierarchy	Cove Construction [559] & [563]
Page 5-3	New para 5.13	'In relation to meeting the needs for housing and employment development, the Council has worked closely with Guildford and Woking Borough Councils, as all three authorities are in the same Housing Market Area (HMA) and Functional Economic Market Area (FEMA). More information on these matters is given in Chapters 6 and 10 respectively.'	Clarity	WBC change
		Renumbering of subsequent paragraphs in chapter 5.	Clarity	WBC change
Page 5-5	Para 5.18 (formerly 5.17)	'Amend to read: ' Churt, Dunsfold, Ewhurst, Frensham, Tilford, Shamley Green, and Wonersh '	Grammar	Waverley BC
Page 5-5	Para 5.19 (formerly 5.18)	Change second sentence to read: 'It is intended that these village boundaries will be reviewed as part of Local Plan Part 2 or in Neighbourhood Plans '.	Accuracy/clarification.	WBC change
Page 5-6	Para 5.22 (formerly 5.21)	Insert a new fourth bullet point; 'The NPPF also promotes the concept of Garden Cities and Villages and this support has been echoed in subsequent announcements by the Government for locally led Garden Villages and Towns of between 1,500 and 10,000 homes.'	Accuracy – adds important context to Dunsfold aerodrome.	Dunsfold Airport Limited [1386]
Page 5-6	Para 5.23 (formerly 5.22)	Amend first sentence to read: 'The Council has commissioned evidence on the likely traffic impacts and necessary highway improvements required of different scenarios for development...'	To address issues arising from the Examination hearings	Examination hearings

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		Delete second and third sentences: 'The evidence to date indicates that there is potential to provide appropriate mitigation on the highway network, although more work needs to be done on this. Development of the site is subject to these matters being satisfactorily resolved through the relevant planning applications' .		
Page 5-6	Para 5.24 (formerly 5.23)	Add at end of paragraph: 'and other strategic sites (defined as sites capable of delivering 100 dwellings or more).'	Comment received to suggest definition added to SP2. The definition is included in chapter 6 but as this reference comes first in the document, it is logical to define it here. Too prescriptive to be included in the policy.	Cove Construction Ltd [56]
Page 5-7	Policy SP2	Amend point 4 to read: 'allow limited levels of development in/around other villages (Alfold, Churt, Dunsfold, Ewhurst, Frensham, Tilford, Shamley Green, and Wonersh)...'	Grammar	Waverley BC
Page 5-7	Delivery	Amend first bullet to read: ' Local Plan Part 2: Site Allocations and Development Management Policies'	Consistency	Waverley BC
Page 6-2	Para 6.6	The penultimate sentence should read "...West Surrey housing market areas area ..."	Typo	Waverley BC
Page 6-2	Para 6.6	The clarity of the paragraph could be improved if the final sentence were re-worded to say: "Meeting half of this unmet need results in an additional 83 new dwellings a year from 2013 to 2032 for Waverley. "	Clarity	Waverley BC
Page 6-2	Para 6.11	Amend to read: 'The trajectory has taken into account evidence on the delivery of housing including where relevant information provided by site promoters. T to ensure that it is realistic...'	Typo/Clarity	Waverley BC
Page 6-3	Para 6.12	Delete final sentence of paragraph. More details on how the windfall estimate is calculated and the	Not necessary to refer to this in the Plan. Consistency as other	Internal

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		justification for its inclusion can be found in the Housing Implementation Strategy	Topic Papers have not been referred to.	
Page 6-4	Para 6.13	Amend penultimate sentence to read: 'Whilst some improvements to infrastructure will be required, the evidence indicates that there are no fundamental insurmountable issues arising from the growth planning in Waverley, such that development must be directed away from certain parts of the Borough.	Recognises that infrastructure issues (transport, water quality) are significant.	DWL Associates [1311]
Page 6-5	Para 6.23	Amend paragraph as follows: In some villages (such as Alfold, Milford and Witley), more sites were put forward for development and assessed as suitable than the number of homes considered to be appropriate and sustainable, given the level of services and facilities in the settlement. In such cases, the allocation has been capped, thus providing a choice of sites in a future neighbourhood plan or in Local Plan Part 2.	For clarity and consistency	Internal
Page 6-6	Para 6.23	Add final sentence. 'The allocation for Elstead assumes delivery of the Weyburn Works site, which is partially in Peper Harow parish.'	Accuracy	Peper Harow Parish Council [1235].
Page 7-1	Para 7.3	Amend final sentence: 'To make the required savings needed from the review, a number of changes to local bus services have been proposed, but none affects Waverley.'	Typo	Waverley BC
Page 7-3	Para 7.14	Amend text in second parentheses (due to the effect of the proposed development...)	Typo	Waverley BC
Page 7-4	Para 7.20	Amend second sentence to read 'regarding the roads in Waverley,' Amend penultimate sentence 'This applied for to development planned...'	Typo	Waverley BC
Page 7-4	Para 7.21	Amend paragraph to read: 'In the Government's Road Investment Strategy (RIS) for the period 2015/16 – 2019/20, one of the schemes identified as being developed for the next five-year Road Period is the improvement of that section of the A3 in Guildford from the A320 to the Hog's Back (A31 junction) with associated safety improvements. Both the Waverley and Guildford Local Plans have been progressed on the understanding that, if the scheme is approved with funding	Guildford Borough Council has received updated information from Highways England on the likely earliest construction commencement for this scheme.	Highways England

		agreed, construction is unlikely to start until 2024 at the earliest, with completion by 2027 improvements will be made to the A3 within the next RIS period for 2020-2025.'		
Page 7-6	Footnote	Replace web link in footnote with document name and source: ² www.waverley.gov.uk/downloads/file/4945/Updating_and_screening_assessment_2015 Air Quality Review and Assessment: Updating and Screening Assessment 2015: Waverley Borough Council (May 2015)	Consistency	WBC change
Page 8-1	Para 8.2	Delete paragraph and replace with: ' Community facilities include services such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship ¹ . These will need to adapt to serve the changing needs of a growing and ageing population in Waverley. Sustainable development aims to support strong, vibrant and healthy communities with accessible local services that reflect the community's needs and support its well-being ² To achieve this, the right community facilities and other local services must be planned to enhance the sustainability of communities and meet local needs ³ . ' Footnotes are ² NPPF para 7, and ³ NPPF para 70 respectively.	Wording improvements	WBC change
Page 8-1	Para 8.3	Add following footnote after the words Community Facilities in the paragraph, In line with the NPPF para 70, Community facilities include services such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.	Wording improvements	WBC change
Page 8-2	Para 8.6	Amend last sentence to read: 'The Charging Schedule is expected to be adopted in 2018 2017.'	Factual update	Waverley BC
Page 8-2	Para 8.7	Amend second sentence to read: This will be able to enable the Council to direct CIL funds.	Wording improvements	WBC change
Page 8-2	Para. 8.8	Amend second line of paragraph to read: 'proportion of the CIL charge may would need to be set aside ('top-sliced') to provide	To be consistent with wording in Policy ICS1(2)	Natural England

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Page 8.2	Para 8.8	Amend fourth line of paragraph to read: 'impact of new development on the habitats of the Thames Basin Heaths...'	Accuracy	WBC change
Page 8-3	Para 8.10	Delete the first two sentences of the paragraph Sustainable development aims to support strong, vibrant and healthy communities with accessible local services that reflect the community's needs and support its well being. To achieve this, the right community facilities and other local services must be planned to enhance the sustainability of communities and meet local needs.	Wording improvements	WBC change
Page 8-3	Para 8.11	Amend final sentence to read: '... It The IDP and its schedule include...'	Clarity	WBC change
Page 8-3	Para 8.13	Amend first and second sentences: In most cases, the provision of infrastructure services do not line up does not align with the Borough's administrative boundary. Under the duty to Co-operate...'	Wording improvement	WBC change
Page 8-3	Para 8.13	Amend second sentence to read: '... the Council has assessed cross-boundary issues. Particularly important in that respect are the impacts of proposed ' Green Town eco-town ' at Whitehill-Bordon and the Aldershot Urban Extension...'	Consistency	Waverley BC
Page 8-4	Para 8.15	Re-word paragraph 8.15 as follows: 'Along with physical and social infrastructure, Green Infrastructure (GI) plays a key part in place-shaping. GI is a conceptual network of multi-functional open spaces, designed and managed managed and designed to best meet society's demands of its environment, underpinning quality of life issues but also supporting biodiversity support biodiversity and wider quality of life issues . It can will also play a role be central in climate change adaptation by... and create wildlife corridors for the migration of species.'	Clarity and accuracy	Surrey Wildlife Trust
Page 8-4	Para 8.16	Amend paragraph to read: 'With regard to water resources, water quality and flood risk, the Environment Agency is preparing some has published Water Cycle Study (WCS guidance). Such studies can be used to ensure that the proposed growth can be delivered within environmental limits and that the required infrastructure can be delivered in a timely manner. The Council has produced a high-level Water Cycle Study and a separate Water Quality Assessment, and will continue to gather	Accuracy	WBC change

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		and assess evidence on these issues as part of its Infrastructure Delivery Plan and to decide and will consider whether further information is required, particularly in deciding relevant planning applications.'		
Page 8-4	Para 8.16	Amend wording (in addition to above): 'With regard to water resources, water quality and flood risk, the Environment Agency has published Water Cycle Study (WCS guidance). Such studies can be used to ensure that the proposed growth can be delivered within environmental limits and that the required infrastructure can be delivered in a timely manner. The Council has produced a high-level Water Cycle Study and a separate Water Quality Assessment which confirms that housing growth is not the limiting factor that will prevent achievement of Water Framework Directive obligations. The Council continue to gather and assess evidence on these issues as part of its Infrastructure Delivery Plan and to decide relevant planning applications.'	Factual update following updated evidence	Waverley BC
Page 8-5	Policy ICS1	Amend bullet point 1 to read: 'Infrastructure considered necessary to support new development must be provided either on- or off-site either as a requirement of planning conditions or by the payment of financial contributions through planning obligations, and/or the Community Infrastructure Levy.'	To add that planning condition may be required	Southern Water
Page 8-5	Policy ICS1	Amend bullet point 2 to read: '...the provision of SANG will be prioritised as items of essential Green Infrastructure to avoid...'	Clarity and accuracy	Surrey Wildlife Trust
Page 9-1	Footnote ⁶ in para 9.3	Delete National Planning Policy Framework 2012 and replace with NPPF para 50	Consistency	WBC change
Page 9-2	Footnote ⁷ in para 9.3	Delete National Planning Policy Framework 2012 and replace with 'NPPF paras 173 and 174'	Consistency	WBC change
Page 9-2	Para 9.4	Amend penultimate sentence to read: 'This has resulted in a high proportion of workers residents commuting from outside of the Borough to do these jobs.'	Wording improvement	WBC change
Page 9-3	Para 9.9	Amend last sentence to read: ' The projected supply of affordable housing would be greater (and the identified affordable housing need	Clarity	WBC change

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		would be lower) if greater public resources had been devoted to delivering affordable housing and more had been built over the last decade, or no properties had been lost through right-to-buy sales.'		
Page 9-4	Para 9.13 Footnote ¹³	Replace footnote 13 with. ¹³ Three Dragons and Troy Planning for Waverley Borough Council Waverley Viability Study 2017, Three Dragons and Troy Planning and Design	Factual update - new footnote reference required	WBC change
Page 9-4	Footnote ¹⁴ in para 9.14	Insert NPPF before para 50	Consistency	WBC change
Page 9-8	Footnote ¹⁹ in Policy AHN1	Replace wording with: 'Paragraph NPPF para 50 '	Consistency	WBC change
Page 9-11 to 9-12	Evidence	Remove heading and bulleted points Evidence <ul style="list-style-type: none"> • The West Surrey Strategic Housing Market Assessment 2015 • CLG: Lifetime Homes, Lifetime Neighbourhoods — A National Strategy for Housing in an Ageing Society • Affordable Housing Viability Study 2016 (Three Dragons Consulting, 2016) Waverley Borough Council Housing Needs Register	Consistency	WBC change
Page 9-12	Para 9.46	Amend first sentence to read: "...there are currently sixteen authorised sites and two unauthorised site for Gypsies and Travellers. There are also two authorised and two unauthorised sites for Travelling Showpeople"	Factual update	WBC change
Page 9-12	Footnote ²² in para 9.47	Replace footnote to read: <ul style="list-style-type: none"> • ' Update Report on the Waverley TAA April 2016 Waverley Gypsy and Traveller Accommodation 	Factual Update/ Consistency	WBC change

		Assessment June 2017'		
Page 9-12	Para 9.47	<p>Replace paragraph 9.47 with: A Traveller Accommodation Assessment (TAA) was published in June 2017. The TAA identifies a need for 27 additional pitches for Gypsies and Travellers and two Travelling Showpeople plots between 2017 and 2032. Part 2 of the Local Plan will identify and allocate sites required to meet these needs.</p> <p>A Traveller Accommodation Assessment (TAA) was carried out in 2014 using a common methodology agreed by all Surrey local planning authorities. The TAA and an update to that report in 2016² identifies a need for 11 additional pitches for Gypsies and Travellers and three Travelling Showpeople plots between 2012-2017. Using a compound growth rate of 3% there is a further requirement for 39 pitches for Gypsies and Travellers and three Travelling Showpeople plots from 2017 to 2027.</p>	Factual update / additional wording	WBC change
Page 9-12 to 9-13	Para 9.48	<p>Replace paragraph with a new paragraph as follows...</p> <p>The 2014 TAA and the 2016 Update reports were undertaken using the definition in planning policy for Traveller Sites at the time, namely, "persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of travelling showpeople or circus people as such". However, since the work and the update were commissioned the definition of a traveller in the PPTS³ has been amended so that persons who have ceased to travel permanently are no longer defined as a Gypsy or Traveller. In the light of the changed definition, the Council will be reviewing the methodology for the TAA and gathering new evidence of need that will provide an update. The Council is already undertaking preparatory work for a new TAA. The intention is that once this new evidence of needs is complete, Part 2 of Local Plan will identify and allocate sites required to meet these needs.</p>	Factual update / Additional wording	WBC change
		² Update Report on the Waverley TAA April 2016		

		The 2017 TAA study provides an assessment of current and future need for Gypsy, Traveller and Travelling Showpeople accommodation in Waverley. As well as providing an update to previous TAAs, another key reason for completing the study was the publication of a revised version of the PPTS in August 2015. This included a change to the definition of Travellers for planning purposes. The key change that was made was the removal of the term “persons...who have ceased to travel permanently”, meaning that those who have ceased to travel permanently will not now fall under the planning definition of a Traveller for the purposes of assessing accommodation need in a TAA.		
Page 9-13	Para 9.49	Remove the word ‘ therefore ’ in the first sentence.	Consistency	WBC change
Page 9-13	Para 9.49	Amend first sentence to read: ‘Policy AHN4 therefore sets out the framework for identifying and allocating Traveller and Travelling Showpeople sites, including rural exception sites for Part 2 of the Local Plan and for determining planning applications’.	Additional wording to respond to representations to make reference in Policy AHN4 to the rural exception sites policy in Planning policy for traveller sites.	(Surrey Gypsy and Traveller Communities Forum, 881)
Page 9-13	Policy AHN4	In first set of bullet points, fourth bullet should read ‘categories’ not ‘catagories’.	Typo	WBC
Page 9-14	Policy AHN4	Additional paragraph to read:: ‘Traveller sites in the Green Belt will not be supported, except in very special circumstances. Rural Exception Sites solely for affordable Gypsy, Travellers and Travelling Showpeople sites will be considered in accordance with Policy D of the Planning Policy for Traveller Sites. Allocations or proposals for permanent and transit sites for Gypsies, Travellers and Travelling Showpeople will only be permitted if:.....’	Additional wording to respond to representations to make reference to rural exception sites policy in Planning policy for traveler sites.	(Surrey Gypsy and Traveller Communities Forum, 881)
Page 10-1	Para 10.1	Replace Local Economic Partnership with Local Enterprise Partnerships	Minor wording change needed as a correction	(Enterprise M3 LEP, 869)
Page 10-1	Para 10.6	Replace Local Economic Partnership with Local Enterprise Partnership	Minor wording change needed as a correction	(Enterprise M3

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				LEP, 869)
Page 10-4	Para 10.18	Amend first sentence: ' Table 10.1 below-summarises the evidence in the ELR....' Amend penultimate sentence to read: 'It also shows the balance of demand and supply following an assessment of the Borough's 150 major employment sites to establish if there is any land in existing employment use that could potentially be suitable for redevelopment or intensification in the short term, medium term and long term longterm. '	Consistency	WBC
Page 10-5	Para 10.19	Amend first sentence: ' As Table above 10.1 demonstrates, the surplus in B1c/B2 and B8....'	Consistency	WBC
Page 10-9	Para 10.33	The third bullet point should read: 'The prices at which the land and buildings have been marketed during this period which should reflect that obtained for similar property is in the locality;'	Typo	WBC
Page 11-2	Para 11.12	Change second sentence to: 'These are the type of uses that encourage people to visit and stay in town centres and increase expenditure in physical shopping.'	Typo	WBC
Page 11-3	Para 11.13	The amount and type of floorspace needed to ensure the continued vitality of Farnham, Godalming, Haslemere and Cranleigh was considered in a 2013 update to the Town Centre Retail Study .	Typo/Accuracy	WBC
Page 11-4	Para 11.19	Amend second sentence as follows: "Farnham Town Council is in the process of preparing a has an adopted neighbourhood plan which may contain contains policies for its town centre."	Factual update	WBC
Page 11-4	Para 11.22	Change ' within the Plan period up to '	Accuracy	WBC
Page 11-5	Para 11.26	Change ' within the period up to '	Accuracy	WBC
Page 11-9	Para 11.37	Change last bullet to: ' Making Make provision for an increase...'	Typo	WBC
Page 11-10	Para 11.42	Remove first bullet point. Amend last bullet point to read: ...community value of Exiting existing services and facilities....	Typo	WBC change
Page 11-10	Policy TCS3	Insert new sentence at the beginning of policy to read: ' The Council will support the provision of small-scale local	Clarity	Thakeham Homes

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		facilities to meet local needs. Where planning permission...'		(Comment ID 927)
Page 12-1	Para 12.3	Amend: Waverley Cultural Strategy, 2016 – 2026 (adoption expected in June 2016)	Factual update	WBC
Page 12-2	Para 12.7	Amend first sentence to: 'Leisure centres in the district are located in Farnham, Haslemere (The Herons and the Edge), Godalming and Cranleigh Leisure Centres.'	Typo	WBC
Page 12-2	Para 12.9	Insert new sentence: ' ...Devil's Punchbowl at Hindhead. Waverley also has a number of designated national and local nature reserves. There is a high...'	Additional factual information included.	Surrey Wildlife Trust (Comment ID 949) and Surrey Nature Partnership (Comment ID 1025)
Page 12-3	Para 12.12	Amend para to read: Detailed criteria for Guidance to assist in designating....	Clarity	Godalming Town Council (Comment ID 1145)
Page 12-7	12.25	Amend to: 'A Borough-wide audit of cultural assets has taken is taking place as part of the new Waverley Cultural Strategy. This included mapping the facilities, identifying deficiencies and was adopted in July April 2016.'	Factual update	WBC
Page 12-7	Policy LRC1	Change to the wording of the second underlined heading should read: "2. New open Space space ..."	Typo	WBC
Page 12-9	Delivery	Amend bullet point 2 to read: 'The greening of the environment, improvements in accessing the natural environment and to existing green infrastructure, incorporating various biodiversity enhancements to be undertaken in partnership with various organisations such as the Waverley Countryside Service, the Surrey Nature Partnership, Wey Landscape Partnership, Action for Wildlife, Blackwater Valley Countryside Partnership and the Surrey Heathland Project. and the Surrey Biodiversity Partnership.'	Clarity and accuracy.	Surrey Wildlife Trust (Comment ID 949)
Para 13-1	Para 13.1	Amend wording to read: 'Waverley has some of the most attractive and unspoilt countryside in Surrey. This high quality environment is one of the Borough's	To improve readability	Surrey Wildlife Trust Comment ID 951

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		greatest assets and makes a significant contribution to giving Waverley its distinctive character, This character, formed over many hundreds several hundreds of years through the activity...'		
Page 13-1	Para 13.4	Amend the fourth sentence to read 'When considering non-strategic additional site allocations in Part 2 of the Local Plan...'	Consistency/accuracy	WBC
Page 13-1	Para13.5	Amend second sentence: ' Areas of ancient woodland, particularly under two 2 hectares ...'	Consistency	WBC
Page 13-2	Policy RE1	Amend: 'Within areas shown as Countryside beyond the Green Belt on the Adopted Policies Map Proposals Map'	Minor wording change needed as a correction	WBC
Page 13-2	Policy RE1	Amend wording to read: Policy RE1 '.....the intrinsic character and beauty of the countryside.....'	Accuracy	Hurtwood Park Polo Club (Comment 1429)
Page 13-3	Para 13.11	Amend final sentence to read: 'It is broadly in support of what is suggested in terms of land to be removed from the Green Belt , and proposes to make the following changes to the Green Belt.'	For clarity	Examination Hearings
Page 13-6	Para 13.17	Add new sentence at the end of the paragraph to read: Each village also has other designations. Chiddingfold and Elstead are both within the Surrey Hills Areas of Outstanding Natural Beauty (AONB) and Great Landscape Value (AGLV). Milford and Witley are covered by these designations to the west of the settlement areas.	Accuracy	Surrey Hills AONB Board (ID Comment 660)
	Para 13.35	Update last sentence: However, the landscape character of the countryside outside the AONB will be protected though criteria based policies and local designations in Part 2 of the Local Plan: Site Allocations and Development Management Policies Non Strategic Policies and Site allocations , where evidence demonstrates that this would be appropriate.	Consistency/accuracy	WBC
Page 13-15	Policy RE2	Amend to: 'The Metropolitan Green Belt as shown on the adopted Local Plan Adopted Policies Map Proposals Map '.	Minor wording change needed as a correction	WBC
Page 13-15	Policy RE2	Amend second paragraph of policy to read: 'Certain forms of development are not considered to be inappropriate	To improve readability.	Twist Homes (ID Comment

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		appropriate in the Green Belt.'		327)
Page 13-16	Footnote ²	Delete National Planning Policy Framework 2012 and replace with NPPF paras 113 and 115	Consistency	WBC change
Page 13-16	Para 13.32 (now 13.29)	Amend wording to read: '...sets out the vision, aims, objectives , policies and plans for the management of the AONB.'	Accuracy	Natural England (ID Comment 905)
Page 13-18	Para 13.40 (now 13.37)	Should be sWaverley Borough set against....	Typo	Waverley BC
Page 13-22	Policy RE3	Policy should have the numbering reinstated to the first three headings i.e. i. Surrey Hills Area of Outstanding Natural Beauty ii. The Area of Great Landscape Value iii. The Farnham/Aldershot Strategic Gap iii should refer to Policy RE1 as Countryside beyond the Green Belt, and not 'Non Green Belt Countryside' as currently referred to.	Minor wording changes for clarity. Minor wording changes for accuracy.	WBC
Page 14-1	14.4	Amend third sentence as follows: 'There are also large parts of south Farnham that are within the developed area, but that have a distinctive semi-rural character and Farnham Neighbourhood Plan policy FNP8 Local Plan saved policy BE3 is in place to protect their character'.	Factual update. Local Plan policy BE3 has been replaced by FNP8, and is not now being saved.	WBC
Page 15-1	Para 15.1	Amend first sentence: ...with some 1,741 over 1700 listed structures,	Number is already out of date and will probably change again before adoption	WBC
Page 15-1	Para 15.1	Amend: 'There are also thirty 30 Scheduled Monuments within the Borough...'	Grammar/consistency	WBC
Page 15.1	Para 15.1	Amend second sentence: ... eight nine Registered Parks and Gardens	Number is out of date but is not likely to change before adoption	WBC
Page 15-1	Para 15.4	Amend to read:	For clarity	WBC

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		As of 19th July 2016 Conservation Area Appraisals have been undertaken....		
Page 15-1	Para 15.4	Amend forth bullet point: 'Cranleigh (2016)'	Consistency	WBC
Page 15-1	Para 15.4	Add ' Haslemere ' in the bullet point list.	No mention of the Haslemere town centre Conservation Area Appraisal which was adopted by WBC on 14 th October 2014.	Individual
Page 15-2	Policy HA1	First sentence of policy to read "The Council will ensure that the significance of the heritage assets within the Borough are conserved and or enhanced..."	Minor wording change for consistency with legislation.	WBC
Page 15-3	Delivery	Amend bullet point 6 to read: Keeping and reviewing a local register of buildings heritage assets at risk or vulnerable to risk.	Greater clarity that other heritage assets will be monitored for risk.	Surrey Gardens Trust (ID 25)
Page 16-1	Para 16.2	Delete from final sentence: which provides enhanced protection given by the Site of Special Scientific Interest (SSSI) status all SPAs also hold.	Accuracy	WBC change
Page 16-1	Para 16.4	Amend second sentence: 'The Thames Basin Heaths SPA covers an area of 8275 ha across Hampshire, (the former county of) Berkshire and Surrey. It is part of a complex of heathlands in southern Southern England that support important populations of breeding birds together support a significant proportion of the global breeding populations of three vulnerable and uncommon birds, including the Dartford Warbler, Nightjar and Woodlark. ' Amend fifth sentence: 'The Thames Basin Heaths Avoidance Strategy sets-out the Council's approach in seeking to avoid the effect of a the recreational impacts on the SPA from any net increase in population from new housing-developments within 5km of the SPA , and how it-proposes to discharge its legal obligations under the Conservation of Habitats and Species Regulations 2010.'	Minor wording changes for clarity.	Surrey Wildlife Trust (956)

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Page 16-1	Para 16.5	Amend first sentence: 'There are two other SPAs in Waverley, Wealden Heaths Phase I (Thursley, Hankley and Frensham SSSI) and Wealden Heaths Phase II (Devil's Punch Bowl SSSI), both selected for similar conservation reasons as the Thames Basin Heaths SPA. ' Amend last sentence: 'Within this chapter, Policy NE1(i) refers to the impacts of development on the Wealden Heaths Phase I & II SPAs and Policy NE3 deals specifically with the Thames Basin Heaths SPA.'	Minor wording changes for clarity.	Surrey Wildlife Trust (956)
Page 16-3	Para 16.13	Amend last line to read: '...They are also important for their biodiversity, as intrinsic wildlife habitats and in connection of as part of interconnected 'green corridors'.	Minor wording changes for clarity.	Surrey Nature Partnership [1028]
Page 16-4	Para 16.16	Amend first sentence to read:: 'Canals and river corridors are examples of valuable 'wildlife corridors' or connections providing connections within and between a network of habitats across the Borough. Amend fifth sentence to read:: In addition, the wider network of smaller watercourses and tributarities needs to be acknowledged.	Minor wording changes for clarity.	Surrey Nature Partnership [1028]
Page 16-5	Para 16.17	Amend first sentence to read:: Waverley's landscape has a distinctive wooded character, with over 10,000 hectares of woodland,; 32% of the B orough.	Minor wording changes for grammar.	Surrey Nature Partnership [1028]
Page 16-5	Para 16.18	Amend: ' Along with local designations, these are listed above in Table 16.1.'	Consistency	WBC
Page 16-5	Footnote ⁴	Insert ' NPPF ' before para 109	Consistency	WBC change
Page 16-6	Para 16.22	Amend selected lines of bullet list: Cranleigh Woods Woodlands Thursley, Hankley & Frensham Heaths Commons (including Wealden Heath SPA Phase I) Devil's Punch Bowl & Hindhead Heaths Common (including Wealden Heath SPA Phase I)	Minor wording changes for accuracy.	Surrey Wildlife Trust (963) and Surrey Nature Partnership (1029)
Page 16-6 to	Para 16.23	Amend second sentence to read:	Minor wording	Surrey Wildlife

<p>16-7</p>		<p>Prior to 2012, the Surrey Biodiversity Partnership implemented the Surrey Biodiversity Action Plan. This plan has now been withdrawn and the partnership now operates as the Biodiversity Working Group of the Surrey Nature Partnership.</p> <p>Amend bullet list: The following priority habitats are relevant to Waverley: Farmland Floodplain Grazing Marsh Heathland Meadows Open Water and Reedbeds Wetland Woodland Wood Pasture and Parkland Road Verge Lowland meadows Lowland calcareous grassland Mixed deciduous woodland Beech & Yew woodland Wet woodland Wood-pasture & parkland Lowland fen Reedbeds Floodplain grazing marsh Rivers Standing open water-bodies Ponds Hedgerows Arable field margins Traditional orchards Inland rock outcrop & scree habitats Open mosaic habitats on previously developed land</p>	<p>changes for accuracy.</p>	<p>Trust (963) and Surrey Nature Partnership (1029)</p>
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Page 16-7	Para 16.24	Amend first sentence to read: 'The Council works in partnership with other conservation projects, such as the Amphibian and Reptile Conservation Group, the Countryside Partnership's Surrey Heathland Project and the Blackwater Valley Countryside Partnership, and aims to conserve and enhance valuable habitats in Waverley.'	Minor wording changes for accuracy.	Surrey Wildlife Trust (963) and Surrey Nature Partnership (1029)
Page 16-8	Para 16.26	Add full stop at the end of the paragraph, after the footnote.	Accuracy	WBC change
Page 16-8	Policy NE1	Amend point (iii) to read 'Sites of Nature Conservation Importance (SNCI), Local Nature Reserves (LNR), Local Geological Sites and other Ancient Woodland, Ancient and Veteran Trees; or any other Priority habitats not identified within (ii) above.'	Addition of any other Priority habitats (NERC Act)	Surrey Wildlife Trust [966] Surrey Nature Partnership [1030]
Page 16-9	Policy NE1	Amend penultimate paragraph to read: 'Within locally designated sites, development will not be permitted unless it is necessary for appropriate on site management measures and or can demonstrate no adverse impact to the integrity of the nature conservation interest.'	Changing 'and' to 'or' would allow SW to deliver essential infrastructure on or near locally designated sites.	Southern Water [1427]
Page 16-9	Policy NE2	Amend second paragraph to read: ' In addition to the measures mentioned in NE1 above , new development should make a positive contribution to biodiversity by creating or reinforcing habitat linkages between designated sites, in order to create achieve a connected local and regional ecological network of wildlife corridors and green infrastructure.'	Minor wording changes for clarity.	Surrey Wildlife Trust (967) and Surrey Nature Partnership (1031) RSPB (late rep)
Page 16-10	Para 16.28	Amend last sentence to read: Further advice should be sought from and agreed with Natural England.	Minor wording changes for clarity.	Natural England (893)
Page 16-10	Para 16.29	Amend third sentence to read: Waverley is part of the Thames River Basin District Waverley is divided across two river basin districts; the Thames River Basin in much of the west and north, and the South East River Basin in the far south.	Minor wording changes for accuracy.	Surrey Wildlife Trust (967) and Surrey Nature Partnership (1031)
Page 16-10	Delivery	Amend second bullet point to read: Improvements to existing green infrastructure, incorporating	Minor wording changes for accuracy.	Surrey Wildlife Trust.

		various biodiversity enhancements to The greening of the environment, improvement in biodiversity and enhancements of the existing green infrastructure will be undertaken in partnership with various organisations such as the Waverley Countryside Service, the Surrey Nature Partnership, Wey Landscape Partnership , Action for Wildlife, Blackwater Valley Countryside Partnership and the Surrey Heathland and the Surrey Biodiversity Partnership.		
Page 16-10	Delivery	Add new bullet point to list 'Monitoring of housing delivered around the Wealden Heaths SPA'	Accuracy	RSPB (late rep)
Page 16-10 to 16-11	Para 16.30	Amend paragraph as follows: The formal revocation of the South East Plan in 2013 retained only two policies, one of which was Policy NRM6: the Thames Basin Heaths SPA. The Council's Thames Basin Heaths SPA Avoidance Strategy (2016 Review) provides guidance to developers on the level of avoidance measures that the Council expects to see incorporated within planning applications. In this instance, 'avoidance measures' means providing or contributing towards Suitable Alternative Natural Greenspace (SANG), and contributing towards a programme of strategic access management and monitoring (SAMM) of the SPA. The Thames Basin Heaths SPA Delivery Framework (2009) was produced by the TBH Joint Strategic Partnership Board (JSPB) on behalf of the member local authorities and other stakeholders. It was prepared as a non-statutory document within the context of the South East Plan and has an important bearing on the way in which the Council deals with applications that may have a significant effect on the SPA. It gives guidance to all the affected local authorities on how to deal with development proposals within the Zone of Influence. Its aim, objectives and key principles are to recommend – <ul style="list-style-type: none"> • a consistent approach to the protection of the SPA from the significant effects of residential development; • the type and extent of residential development that may 	To improve flow.	WBC Change

		<p>have a significant effect alone or in combination on the SPA; and</p> <ul style="list-style-type: none"> • key criteria for the delivery of avoidance measures. 		
Page 16-11	Para 16.31	<p>Amend para as follows: Waverley's only current SANG resource is the Council-owned facility at Farnham Park. The capacity of the Farnham Park SANG (number of dwellings) is calculated using the SPA Delivery Framework formula of 8 ha of SANG per 1000 new residents. This operates as a 'strategic' resource that is available to mitigate approved housing developments (including prior notifications) within 5 km of the SPA. The park's SANG capacity is a finite resource in terms of the numbers of new dwellings it can support. The remaining (unallocated) capacity is monitored continually and the latest position is reported to every meeting of the Council's Western Planning Committee.</p> <p>The Council's Thames Basin Heaths SPA Avoidance Strategy Review (2016) provides guidance to developers on the level of avoidance measures that the Council expects to see incorporated within planning applications. In this instance, 'avoidance measures' means providing or contributing towards Suitable Alternative Natural Greenspace (SANG), and contributing towards a programme of strategic access management and monitoring (SAMM) of the SPA. This Review was based on new information on visitor capacity which identified enhanced SANG capacity at Farnham Park sufficient to provide mitigation for at least 75% of the Farnham area's net housing requirement.</p>	To improve flow.	WBC Change
Page 16-11	Para 16.32	<p>Amend para as below: As at 1st April 2016, the remaining SANG capacity was sufficient to accommodate only a further 243 dwellings. The local plan strategy allocates 2,330 new homes for the Farnham area. Taking account of sites that already have planning permission and/or lie outside the SPA's 5 km 'Zone of Influence', a further 1,317 dwellings are expected to be provided between 2016 and 2032. The impact of this 'net' housing figure on the SPA will need the requisite amount of</p>	Accuracy	WBC Change

		<p>SANG to be identified according to the TBH Delivery Framework formula (see 16.30 above). Depending on the average occupancy rates of new dwellings¹⁴ this would be between 20.2 and 24.5 ha of new SANG.</p> <p>Waverley’s only current SANG resource is the Council-owned facility at Farnham Park. The capacity of the Farnham Park SANG (number of dwellings) is calculated using the SPA Delivery Framework formula of 8 ha of SANG per 1000 new residents. This operates as a ‘strategic’ resource that is available to mitigate approved housing developments (including prior notifications) within 5 km of the SPA. The park’s SANG capacity is a finite resource in terms of the numbers of new dwellings it can support. The remaining (unallocated) capacity is monitored continually and the latest position is available on our website.</p>		
Page 16-12 to 16-13	Para 16.35	<p>The Thames Basin Heaths SPA Delivery Framework (2009) was produced by the TBH Joint Strategic Partnership Board (JSPB) on behalf of the member local authorities and other stakeholders. It was prepared as a non-statutory document within the context of the South East Plan and has an important bearing on the way in which the Council deals with applications that may have a significant effect on the SPA. It gives guidance to all the affected local authorities on how to deal with development proposals within the Zone of Influence. Its aim, objectives and key principles are to recommend.</p>	Accuracy	WBC Change
Page 17-1	Para 17.4	<p>Amend: ‘The Government has set a target under the Climate Change Act 2008 to reduce CO₂ emissions by in 80% by 2050, with an interim target of 34% by 2020, both against a 1990 baseline.’</p>	Accuracy	WBC
Page 17-1	Para 17.4	<p>Amend last sentence to read: ‘The first five three budgets were –‘</p> <p>Add ‘by 2020’ to the end of third bullet point. Add two bullets points to the end of the list</p> <ul style="list-style-type: none"> • 2023-2027: 50% reduction below 1990 levels by 2025 • 2028-2032: 57% reduction below 1990 levels by 2030 	Accuracy	WBC change
Page 17-1 to 17-2	Para 17.5	<p>Replace whole paragraph to read: A fourth budget, covering the period from 2023 to</p>	To avoid inaccuracies	WBC change

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		<p>2027 was set in law in June 2011 and aimed for a 50% reduction below 1990 levels.</p> <p>'The first carbon budget has been met as UK emissions were 35% below 1990 levels in 2014.</p> <ul style="list-style-type: none"> • According to the Committee on Climate Change, the UK is currently on track to outperform the second and third carbon budgets, but not on track to meet the fourth, which covers the period 2023-27. Meeting future carbon budgets and the UK's 80% target for 2050 will require reducing domestic emissions by at least 3% a year. This will require existing progress to be supplemented by more challenging measures.' 		
Page 17-2	Para 17.6	<p>Delete whole paragraph</p> <p>The Carbon Plan: Delivering our low carbon future (December 2011) updated and superseded the LCTP and presented the Government's strategy for meeting all four budgets, with a particular focus on the fourth.</p>	Accuracy	WBC change
		Renumber subsequent paragraphs		
Page 17-5	Para 17.25 (was 17.26)	Amend text to read: Local Planning a Authorities	Consistency	WBC change
Page 17-5	Para 17.27 (was 17.28)	Amend text to read: This Reductions can be achieved	Clarity	WBC change
Page 17-6	Para 17.28 (was 17.29)	Amend para to read: 'In that way, this approach it can help reduce capital and operational costs, improve energy efficiency and reduce carbon emissions. A fabric first method approach can also reduce the need for maintenance during the building's life. # The Council will also,...	Consistency	WBC change
Page 17-7	Para 17.29 (was 17.30)	Amend first sentence to read: 'Where developers, for technical or financial reasons, considers it not possible to achieve the standards required by this policy, the onus will be on them to provide appropriate evidence in support of any planning application'	Typo/accuracy	WBC
Page 17-7	Para 17.29 (was 17.30)	Add to the end of paragraph 17.30 'The Council acknowledges that government has said Local	To be consistent with Government stated	House Builders Federation

		Plans should not set any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings’.	requirements	
Pages 17-7	New Para 17.30	Add new paragraph: ‘In addition to addressing sustainable design and construction, Policy CC2 has potential to support improved health and well-being’.	To emphasise the implication of walking, cycling, and access to sustainable forms of transport to health and well being.	Surrey County Council
Page 17-7	Footnote ³	Insert NPPF before ‘pPara 91’	Consistency	WBC change
Page 17-8	Para 17.37	Amend second sentence to read: The objectives of the updated assessment objectives were to -	Wording improvements	WBC change
Page 17-9	Para 17.38	Amend final sentence: Because As a number of potential...	Wording improvements	WBC change
Page 17-9	Policy CC4 (1a,1b,1c)	Add new first sentence: ‘Flood zones in Waverley are defined as contained within National Planning Practice Guidance and the Council’s Level 2 Strategic Flood Risk Assessment. Reorder existing numbering of 1a. to 1b; 1b. to 1c. and 1c to 1a. to read: a. ‘Where sequential and exceptions 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 of property and life should flooding occur; b. 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); and c. It would not constrain the natural function of the flood plain, either by impending flood flow or reducing storage capacity.’	To include a clear definition of flood zones and to re-order policy to be consistent with the assessment process of sequential test first before the sequential approach.	Environment Agency (Comment ID 1439)

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		Remove paragraph 1d.		
Page 17-9 to 17-10	Policy CC4	Amend Part 2 of Policy CC4 to read: 'Sustainable Drainage Systems (SuDS) will be required on major developments (10 or more dwellings or equivalent) and encouraged for smaller schemes. A site-specific Flood Risk Assessment required for sites within or adjacent to areas at risk of surface water flooding as identified in the SFRA. There should be no increase in either the volume or rate of surface water runoff. Proposed development on brownfield sites should aim to reduce run off rates to those on greenfield sites where feasible . There should be no property or highway flooding, off site, for up to the 1 in 100 year storm return period, including an allowance for climate change'.	To make wording to be technically correct.	Surrey County Council
Page 18-2	18.4	In first sentence, delete '14 hectare' and replace with ' 12 hectare '.	Factual error.	Wates Developments Limited (ID1462)
Page 18-2	18.4	After the penultimate sentence, add new sentence: 'Avoidance and mitigation measures in line with Policies NE1 or NE3 would be required.'	Cross reference to add clarity.	Natural England (ID894)
Page 18-2	18.4	After the new sentence above, add a further new sentence: 'The site is also adjacent to Biodiversity Opportunity Area R04, River Wey & Tributaries and development should assist achievement of BOA objectives (see Policy NE1).'	Cross reference to add clarity.	Surrey Wildlife Trust (ID971) & Surrey Nature Partnership (ID1036)
Page 18-2	18.4	Amend final sentence as follows: 'It is anticipated that this site would be delivered by 2026 2027 .	To reflect updated delivery information	Examination hearings
Page 18-5	18.5	Amend the third sentence to read: 'The site lies within 5km of the Thames Basin Heaths SPA and avoidance and mitigation measures in line with Policies NE3 would be required. ' Amend the subsequent sentence to read:	Cross reference to NE3 to add clarity.	Natural England (ID895)

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		'Part of the site...'		
Page 18-5	18.5	Add new sentence after '... Strategic Gap': 'This site is adjacent to Weybourne Local Nature Reserve where due sensitivity is required during any development (see Policy NE1).'	Cross reference to NE1.	Surrey Wildlife Trust (ID973)& Surrey Nature Partnership (ID1037)
Page 18-5	18.5	Amend final sentence as follows: 'It is anticipated that this site would be delivered by 2024 2022 .'	To reflect update housing supply information	Examination hearings
Page 18-7	18.6	Amend the third sentence to read: 'The site lies within 5km of the Thames Basin Heaths SPA and avoidance and mitigation measures in line with Policies NE3 would be required. ' Amend the subsequent sentence to read 'and It is partly within an area of High Archaeological Potential'.	Cross reference to NE3 to add clarity.	Natural England (ID902)
Page 18-7	18.6	Amend final sentence to read ' Planning permission was granted on 5 October 2016 for 96 dwellings and up to 4,200 sqm of commercial floor space on the main area, so it is anticipated that this site would be delivered by 2021.'	Factual update.	Waverley BC
Page 18-11	18.9	At end of paragraph, add new sentence: ' This site includes part of the Biodiversity Opportunity Area R04 (River Wey & tributaries) and development should assist achievement of BOA objectives (see Policy NE1).' '	Cross reference to add clarity.	Surrey Wildlife Trust (ID975) & Surrey Nature Partnership (ID1038)
Page 18-11	Para 18.10	Amend second sentence: ' Planning permission for 425 dwellings on one of these sites, to the east of Alfold Road and west of Knowle Lane, was granted on 31 st March 2016.'	Consistency	WBC
Page 18-11	Para 18.10	Amend final sentence: 'It is anticipated that a comprehensive development of this site for housing and public open space would be fully delivered by 2026 2027 .'	Factual update (5 year land supply statement)	Waverley BC
Page 18-14	18.11	Amend second sentence: 'Part of the site is within Flood Zones 2 and 3 and the site lies about 800m from within 5km of the Wealden Heaths Phase I SPA. Add text after 2 nd sentence: ' Due to its proximity to the SPA, a	The on-line version of the plan included an amendment to the second sentence and	Natural England (ID903)

		project-level HRA assessment is likely to be required to ensure that no likely significant effect would result, in accordance with Policy NE1'	an additional sentence not in the pdf version. To resolve any confusion, this is included as a Minor Modification, but it has been amended to address key stakeholder representation that there should be a cross reference to NE1.	
Page 18-14	18.11	After new third sentence, add: 'This site includes land within Biodiversity Opportunity Area R04 (River Wey & tributaries) and development should assist achievement of BOA objectives (see Policy NE1).'	Cross reference to add clarity.	Surrey Wildlife Trust (ID976) & Surrey Nature Partnership (ID1039)
Page 18-16	18.13	Add after second sentence: 'However, the site is in close proximity to the Surrey Hills AONB and a project level Landscape and Visual Impact Assessment (LVIA) would be required at the planning application stage. Engagement with Natural England is encouraged. '	To address key stakeholder representation regarding potential impacts on the AONB.	Natural England (ID908)
Page 18-16	18.13	Add sentence after 'is encouraged': 'The site is adjacent to Biodiversity Opportunity Area LW01 (Chiddingfold and West Weald Woodlands) and development here would be expected to assist achievement of relevant BOA objectives. The site also includes SNCI and Ancient Woodland where any impacts must be avoided/mitigated (see Policies NE1 and NE2).'	Further detail and cross reference to add clarity.	Surrey Wildlife Trust (ID978) & Surrey Nature Partnership (ID1040)
Page 18-16	18.14	After second sentence add: 'The site has some heritage value as a former Second World War aerodrome and there are some buildings and structures on the site that are regarded as heritage assets.'	Clarification.	WBC change
Page 18-16	18.15	Add new sentence to end of paragraph as follows:	Factual update.	

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		'Planning permission was granted, subject to a legal agreement, on 14 December 2016 but this decision has since been 'called in' by the Secretary of State for a public inquiry that started on 18 July 2017.'		
18-20	18.28	Amend last sentence: 'Further design guidance is provided by the National Planning Practice Guidance (NPPG).'	Accuracy	WBC
18-22	Policy SS7A	V. Amend last sentence: ' The M masterplan will encourage smarter transport	Accuracy/Grammar	WBC
	Renumbering of paragraphs after insertion of SS7A	Clarity	WBC change	
Page 18-26	Para 18.27 Renumbered para 18.30	Amend final sentence as follows: 'As the Council resolved to grant planning permission on the site, subject to a legal agreement, in February 2017, it is anticipated that this site would be delivered by 2024 2022'.	Factual update (5 year housing land supply statement)	WBC change
Page 18-28	Renumbered para 18.31	Add after fourth sentence: 'In accordance with Policy WD2 of the Surrey Waste Plan 2008, waste management could be one of the many appropriate employment uses for this site.'	To address waste planning authority's representation regarding appropriate uses on this site.	Surrey County Council (ID841)
Page B-1	Appendix B Saved Policies	Delete: ' The existing 2002 Local Plan Proposals Map and the Town Centre Inset maps should be read alongside the policies.'	No longer relevant as 2002 Local Plan Proposals Map will not exist after adoption of Local Plan Part 1.	WBC change
Page B-2	Appendix B	Under heading Built Environment, the row for BE3, South Farnham Area of Special Environmental Quality, should say "No" in third column, and not "Yes".	BE3 has been replaced by Policy FNP8 (South Farnham Arcadian Areas) in the 'made' Farnham Neighbourhood Plan.	WBC
Page B-2 to	Appendix B	Farnham/Aldershot Strategic Gap C4 Yes No	Factual change	WBC change

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B-5	Saved Policies	Areas of Strategic Visual Importance C5 Yes No Major Developed Sites RD 6 No Yes		
Page B-6	Appendix B Saved Policies	A31 Farnham By-Pass Improvements M19. Yes	Missed from original list	WBC change
Page D-1	Appendix D	Amend Godalming row as follows: replace figure in column G (58) with “308” and replace figure in column H (294) with “44”. Consequently, replace Total figure for column G (406) with “656” and figure for column H (1775) with “1525”.	To ensure table is consistent with housing trajectory. The 250 dwellings anticipated at Aaron’s Hill site in Godalming were included under column H instead of G. However, the total figures for Godalming are unchanged.	WBC
Page F-12	Appendix F Monitoring Framework	Add second bullet point in row CC4 Flood Risk Management in Indicators column: Number of properties granted planning permission in flood zone 2 and number of properties granted planning permission in flood zone 3	To monitor the effectiveness of the flood risk policy in initially steering development to areas at least risk of flooding.	Environment Agency
Page G-1	Appendix G Glossary of Key Terms	Change of term ‘Adopted Policies Proposals Map’	Updated title.	WBC
Page G-1	Appendix G	Replace the definition of ‘Adopted Policies Map’ with the following: “A map or maps that illustrate geographically the application of policies in a development plan, on an Ordnance Survey base map.”	Updated terminology.	WBC
Page G-1	Appendix G	Amend Ancient Monument definition: ‘ A building or structure above or below ground whose preservation is of national importance and which has been scheduled by the Secretary of State for Digital,	Factual Update	WBC

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		Culture, Media and Sport...'		
Page G-2	Appendix G Glossary of Key Terms	Change to ' Authority Annual Monitoring Report (AMR)' (move to correct place in Glossary alphabetically)	Accuracy	WBC change
Page G-2	Appendix G	Amend definition of Authority Monitoring Report (AMR) to 'A report submitted to the government published by local planning authorities setting out monitoring information, including assessing progress with and the effectiveness of a Local Development Framework Plan. '	Factual Update	WBC
Page G-3	Appendix G	Amend Building of Special Architectural or Historic Interest definition: 'A list of these is compiled by the Secretary of State for Digital, Culture, Media and Sport ... '	Factual Update	WBC
Page G-4	Appendix G	Delete definition of Code for Sustainable Homes	Factual. No Longer exists	WBC change
Page G-4	Appendix G	Replace definition of Combined Heat and Power with the following text. 'The coproduction of heat and power, usually involving the capture of waste heat from electricity generation to provide heating for a building or district.'	Clarification	WBC change
Page G-4	Appendix G	Delete 'Community Strategy' definition	Factual update/ accuracy.	WBC change
Page G-4	Appendix G	Amend definition of Convenience floor space. 'Shops selling good such as good food , newspapers and drinks...'	Accuracy, SP	WBC change
Page G-4	Appendix G	Delete 'Core Strategy' definition	Factual update.	WBC change
Page G-5	Appendix G	Add additional final sentence to DCLG definition: ' As of January 2018, the DCLG will be known as The Ministry of Housing, Communities and Local Government's (MHCLG). '	Factual Update	WBC
Page G-5	Appendix G	Delete final sentence of 'Development Plan Documents (DPDs)' definition.	Factual Update	WBC
Page G-6	Appendix G	Amend 'Evidence Base' definition: 'The information and data gathered by local authorities to inform and support the policy approaches to be set out in the Local Plan Development Documents , including physical, economic, and social characteristics	Factual Update/ accuracy	WBC

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		of an area.'		
Page G-6	Appendix G	Amend 'Examination' definition: 'The Local Plan Core Strategy DPD is subject to independent examination. The Local Plan is subject to independent examination. An independent inspector will assess whether a plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. This considers two matters of legal compliance and soundness. To be considered 'sound' a Local Plan Core Strategy should be positively prepared , justified, effective and consistent with National Policy.'	Factual Update/ accuracy	WBC
Page G-6	Appendix G	Amend 'Farnham/Aldershot Strategic Gap' definition: ' A local landscape designation which identifies an area between Farnham, Badshot Lea and Aldershot. See: Strategic Gap'	Accuracy/clarity/ consistency	WBC
Page G-6	Appendix G	Amend definition of Greenfield Sites to 'Land (or a defined site) outside defined settlement boundaries that has not previously been developed.'	Accuracy	WBC
Page G-7	Appendix G	Amend 'Housing Needs Register' definition: 'The Housing Needs Register is the list of households who would like to be housed in Council or Housing Association properties in Waverley.'	Accuracy	WBC
Page G-7	Appendix G	Amend 'In Centre' definition: 'The primary shopping area as shown on the Adopted Policies Proposals Map.'	Minor wording change needed as a correction	Waverley BC
Page G-7	Appendix G	Amend 'Infrastructure Delivery Plan (IDP): 'A document which identifies future infrastructure and service needs for the Borough over the Local Core Strategy Plan period.'	Factual Update/ accuracy	WBC
Page G-8	Appendix G	Remove 'Lifetime Home Standards' definition.	Factual. No Longer exists	WBC change
Page G-8	Appendix G	Amend 'Listed Building' definition: Listing includes the interior as	Factual Update &	WBC

		well as the exterior of the building, and any buildings or permanent structures (e.g. wells) within its curtilage). Historic England English Heritage is responsible for designating buildings for listing in England.	accuracy	
Page G-8	Appendix G	Replace definition for Local Nature Reserve (LNR). 'A habitat of local significance for nature conservation. Areas of local, but not necessarily national, importance. LNRs are almost always owned by local authorities, and they often pass the management of the LNR onto County Wildlife trusts. They also often have good public access and facilities.'	Inadequate definition	Surrey Wildlife Trust and Surrey Nature Partnership (ID Comments 979 and 1041)
Page G-8	Appendix G	Amend 'Localism': The Localism Act has devolved greater powers...'	Typo	WBC
Page G-10	Appendix G	Remove: 'Proposals Map Part of the Local Development Documents that identify areas that should be protected, safeguarded sites in the Minerals and Waste Development Framework and areas to which specific policies apply.'	Unnecessary repetition	WBC
Page G-10	Appendix G	Amend 'Registered Park & Gardens' definition: 'This record, known as the <i>Register of Parks and Gardens of special historic interest in England</i> and now containing nearly 1450 sites, was established, and is maintained by, Historic England English Heritage .'	Factual Update	WBC
Page G-11	Appendix G	Amend 'Saved Polices' definitions: 'Policies within unitary development plans, local plans and structure plans that are 'saved' for a time period during the production of policies in Local Plans Development Documents , which will eventually replace them.'	Factual Update & accuracy	WBC
Page G-11	Appendix G	Replace definition for Sites of Nature Conservation Importance (SNCI) ' Locally important sites of nature conservation. These are adopted in development plan documents. Areas which are designated locally for their wildlife importance. SNCI designation does not carry any statutory protection and is additional to national designations such as Sites of Special Scientific Importance	Further clarification needed	Surrey Wildlife Trust and Surrey Nature Partnership (ID Comments 979 and 1041)

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		(SSSI) and Areas of Outstanding Natural Beauty (AONB). SNCIs are nevertheless valuable as they help to keep us informed of the extent of natural plant and animal life in the Borough.'		
Page G-11	Appendix G	Delete definition of 'Source of Information'.	Deemed unnecessary	WBC
Page G-12	Appendix G	Amend 'Strategic Flood Risk Assessment (SEA)' definition: 'A SFRA should be carried out by the local planning authority to inform the preparation of its Local Plan Development Documents (LDDs), having regard to catchment-wide flooding issues which affect the area. Policies in Local Plans LDDs should set out requirements for site-specific Flood Risk Assessments (FRAs) to be carried out by developers and submitted with planning applications in areas of flood risk identified in the plan.'	Factual Update & accuracy	WBC
Page G-12	Appendix G	Amend SANG definition: 'Suitable Alternative Natural Green Spaces are green spaces (parks, woodlands, playing fields etc.) provided in areas where development could bring increased visitor pressure on Special Protection Areas (SPAs). They are a central element of the Council's Special Protection Area Strategy for the Thames Basin Heaths SPA and aim to reduce pressure on the SPAs by providing attractive green spaces that people can use for recreation instead of the SPA'	Accuracy and consistency	WBC
Page G-12	Appendix G	Amend definition title: 'Sustainability Appraisal (including Environmental Appraisal)'	Accuracy	WBC
Page G-13	Appendix G	Delete definition of Sustainable Community Strategy	Factual. No longer exists.	WBC change
Page H-1	Appendix H	Change to ' Waverley Affordable Housing Viability Study 2016 '	Factual update	WBC change
Page H-2	Appendix H	Change to 'Waverley Borough Council Level 2 Strategic Flood Risk Assessment, Capita (August 2016 Updated December 2016)'	Factual update	WBC change
Page H-3	Appendix H	Change to 'Sustainability Appraisal Report for the Waverley Borough Local Plan Part 1, AECOM (August 2016)'	Factual update	WBC change
Appendix H	Appendix H	Additional Reference documents added: <ul style="list-style-type: none"> 'Dunsfold Aerodrome Delivery Rates Assessment: Troy Planning + Design (2016) 	Factual update	WBC change

Schedule of Proposed Minor Non-Material Modifications to Local Plan Part 1

		<ul style="list-style-type: none">• Technical Note: HGVs Associated with Dunsfold Development (August 2016)• Technical Note: Commercial Vehicle Surveys, Mott MacDonald (November 2016)• Waverley Borough Council Water Quality Assessment, AMEC (December 2016)'. 		
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For information only

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Cllr Bolton	In response to Cllr Bolton's question, officers confirmed that the adoption date of September/October 2018 referred to relates to CIL, assuming that LPP1 is adopted by the Council this month.
Cllr Deanus	<p>Is the reference to LPP1 providing 'certainty' in relation to housing numbers relevant to the total number of dwellings per annum, or the allocations to towns and villages?</p> <p>At the Springbok appeal there was a focus on the local sustainability of the housing numbers; does the Local Plan provide certainty?</p>
Elizabeth Sims	In the absence of an adopted Local Plan, there is no confirmed housing number, only the Inspector's view of what it should be. At planning appeals, Waverley would find it difficult to defend a lower number.
Ian Motuel	Policy ALH1 sets the minimum parish allocations, so in relation to the Town and Parishes the Local Plan does provide certainty.
John Mathisen, Elstead Parish Council	<p>Elstead Parish Council is concerned that the Modifications in relation to release of Green Belt (Elstead village to be inset from the Green Belt, along with some adjacent parcels of land) do not include a brownfield site that the Parish wishes to allocate for housing in the Neighbourhood Plan, and it appears that the Inspector's report precludes further review of the Green Belt in LPP2 other than defining the precise Green Belt boundary.</p> <p>There is a risk that the Neighbourhood Plan will not pass the Referendum if this site cannot be included.</p>
Gayle Wootton	This question is more relevant to LPP2 and Neighbourhood Plans, and not LPP1. The Neighbourhood Plan must conform with the LPP1. The LPP1 is sound, subject to the Modifications, and these provide more clarity in respect of the areas of Green Belt to be released. The Neighbourhood Plan and LPP2 process will provide the opportunity to consider Green Belt boundaries in detail and site allocations.
Barbara Kinnes, Witley Parish Council	Witley has concerns about the Green Belt boundary changes. Witley Parish has an allocation of 480 dwellings and even allowing for Milford golf course, there are a considerable number of sites needed. The three sites identified to be released from the Green Belt are also covered by AONB and SPA designations which the Inspector (para 36) indicates should be adequate to protect valued landscapes.

	How can Witley deliver enough sites if the entire parish except for the inset village is Green Belt and/or AONB?
Gayle Wootton	This is another discussion for LPP2. The Neighbourhood Plan process includes a sustainability appraisal that looks at each site, and Waverley will help parishes with that exercise. However, whilst the Inspector is mindful of the constraints he still feels that 590 dpa is deliverable.
Cllr Seaborne	In reality, we are committing to 600dpa, as we are running a shortfall over the first 4 years of the Plan period. Can Waverley be sanctioned if planning permissions are granted but developers do not build out the permissions? It is out of Waverley's control and presents a real risk.
Ian Motuel	<p>The Inspector has looked at the deliverability of sites and is satisfied that the Plan is deliverable. The Council has to maintain a 5-yr Housing Land Supply, and we have worked with developers to ensure that identified sites come forward. This will be monitored through Authorities Monitoring Report. Moreover a future review of the Local Plan will take account of the actual deliverability of sites and homes. In the end, it is down to the market to encourage developers to deliver, but the Council will use all its powers.</p> <p>Waverley has to demonstrate it has a 5-yr Housing Land Supply, and an adopted Local Plan enables us to do that.</p> <p>The Housing White Paper included some measures that focused on the construction industry and the actual delivery of planning permissions, and it is expected that this will inform an updated NPPF.</p>
Cllr MacLeod	<p>Not convinced by the Inspector's statement on deliverability. In the first 4 years of the Local Plan period, 1,040 homes had been delivered (average of 260 pa). The forecast trajectory was well over the actual number of dwellings delivered. In the first 9 months of 2017/18, 156 homes had been delivered, so there was no evidence that delivery would increase, regardless of the planning permissions granted by Waverley. Developers didn't have the capacity to deliver, and there was a negative impact on market prices of delivering more homes.</p> <p>Convinced that homes would not be delivered, and this was the fault of the Government destroying the planning system.</p>

Elizabeth Sims	Cllr MacLeod's point is understood. However we do not build homes. All Waverley can do is seek to provide sufficient land to defend its 5-yr supply. With an adopted Local Plan we are in a stronger position to defend a 5-yr Housing Land Supply than without one.
Cllr Ramsdale	Looking at the risks of non-adoption, even if I disagree with the Inspector's conclusions on issues, if we vote against adoption are we shooting ourselves in the foot? We will have no protection, and developers can use the Inspector's report to support their case.
Elizabeth Sims	That is correct. Members may disagree, but the Inspector's conclusions are final and in Planning terms are a 'highly material consideration'.
Cllr Goodridge	It is a bitter pill Waverley is being asked to swallow. Will Guildford be treated in the same way [in relation to Woking's unmet need]? Is it correct that the same Inspector has been appointed to do Guildford's Examination?
Elizabeth Sims	Jonathan Bore has just been appointed as Inspector for Guildford's Draft Local Plan examination, and we presume there would be some consistency in his approach. We recognise that taking Woking's unmet need is likely to be the most unpopular aspect of the Inspector's report.
Cllr Adams	It's not just in Waverley that developers are not building out the permissions they have, and councils are lobbying government for more powers. There are new rules being implemented at the end of March that Waverley will have to follow if the Local Plan is not adopted.
Cllr James	Can we split the housing allocations between Waverley, Woking and London, so we can see if we are meeting our [Waverley's] need?
Elizabeth Sims	Formally, we are not able to deviate from the gross figure of 590dpa, but informally officers may be able to help Members to understand the composition of this figure better.
Cllr Forszewski	Waverley has waited a long time to get this level of certainty. The risks of not adopting mean no Part 2, no CIL. The housing numbers won't go away. The Plan has come too late to save Cranleigh, but gives a level of protection going forward. It's an opportunity to shape what happens going forward and non-adoption leaves us in a dreadful position.

Charles Orange, Hascombe Parish Council	How does Woking's unmet need come about? If Woking updates its Plan and is able to meet its need, what does that mean for Waverley's Plan?
Ian Motuel	The housing need is taken from the SHMA and population projections. There is unmet need in Woking and the Inspector has concluded that Waverley is "less constrained" than Woking and Guildford.
Elizabeth Sims	The +83dpa relating to Woking's unmet need only covers the period up to the end of their Local Plan period. Unfortunately, Plans are always out of sync with one another. Woking will update their Plan based on a fresh housing market assessment, and may be required to pick up unmet need from Waverley if homes are not delivered here. But, Woking will remain largely covered by Green Belt and therefore constrained.
Cllr Byham	The figure for migration from London is bizarre! What is the definition of London used, and how do we know where people come from to occupy housing in Waverley – how do we know if we are meeting our need, or Woking's, or London's?
Elizabeth Sims	The definition of London used is the area covered by the London Mayor's London Plan (Greater London). It is impossible to monitor occupancy and who is buying homes and where they are from. We have an allocation of housing numbers, but monitoring takes place on the basis of completions with no differentiation of where people come from.
Cllr Band	Whether we believe 590 is the correct number, or not, is irrelevant. It is now in the public domain. Waverley should adopt the Plan and get some of the benefits, like CIL. What people are concerned about is the lack of infrastructure to support the number of new homes and we need to move forward and get the infrastructure needed as soon as possible.
Cllr Round	12 dpa for London migration is bizarre. It is difficult to predict numbers. What about the impact of Brexit, and the implications for deliverability and demand for housing in the south east? Take these figures.

Daniel Bainbridge	Regarding the 590dpa figure, including the Woking uplift and London migration figures and uncertainty about how those had been reached – this is the Inspector’s professional judgement, informed by detailed evidence put forward by Waverley and all parties to the Examination process.
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LPP1 Member Information Session 2 – 13 February 2018

Cllr Hargreaves	Understands that we have to accept the Inspector’s report, but why do we have to accept a Plan that isn’t right, and not take the time to get it right?
Elizabeth Sims	In technical terms, with the specified Modifications, the Inspector’s view is that the Plan is sound (ie. “right”).
Cllr Hunter	There is a proposal to release some Green Belt in Binscombe for housing. Could the land be used to build a clinic?
Ian Motuel	There is nothing in the Plan to prevent use of the land for some other purpose as part of a mixed use scheme, and it would be handled through the planning application process.
Cllr Hyman	This is the worst case Plan we could have put together. Are the lawyers satisfied with the Inspector’s statement of there being “no convincing evidence that 590dpa cannot be delivered in a sustainable manner”. Do we have convincing evidence of the mitigation needed by the Habitat Regulations?
Lewis Jones	The Inspector has found the Local Plan sound and we have to accept that unless we have reason to go to judicial review. The Inspector is satisfied that the Habitat Regulations Assessment requirement has been complied with.
Cllr Hyman	With reference to the Wealden Judgement, officers and an Inspector can be wrong. We have no ‘in combination’ assessment of the impact on the Wealden Heaths and do we continue to ignore this?
Gayle Wootton	There is an in combination assessment for the Wealden Heaths SPA that covers off the issue raised in the Wealden Judgement. The Inspector is cognisant of the Wealden Judgement and challenged Waverley to comment on this in his post-main modifications consultation questions.

Cllr Hyman	Regarding the outstanding Natural England objection, has the Council had an update and has Natural England removed its objection? The Habitats Regulations Assessment is based on a flimsy assessment that traffic flows will go down.
Gayle Wootton	Natural England submitted an objection to the Main Modifications consultation, but did not object to the Submission Plan. The Inspector has agreed with our approach [re SANG at Farnham Park in the short term] so the issue has been closed off.
Cllr Hyman	For the O&S meeting, would like an assessment of why the [housing numbers in the] Neil McDonald report is wrong.
Cllr Follows	Does the absence of an adopted Local Plan give Neighbourhood Plans more flexibility? If it has such weight whether we pass it or not, why adopt it?
Elizabeth Sims	<p>The Inspector's report is a very highly material planning consideration. Planning applicants and Appeal Inspectors can use it and take account of it. It establishes the housing numbers, and the lack of certainty with not having an up to date Local Plan has already cost us appeal decisions.</p> <p>The relevance to Neighbourhood Plans is that the Local Plan provides an up to date strategic framework. In the absence of a Plan, Neighbourhood Plans must comply with the 2002 Local Plan which is 15 years out of date. Development pressures would still reflect the latest position as articulated in the Inspector's Report.</p>
Cllr Follows	So, the decision on Tuesday is a formality ...
Cllr Hunter	The Local Plan is not just about housing; there is a lot of other work and evidence, and urge adoption.
Cllr Hargreaves	Farnham Neighbourhood Plan passed by residents, Waverley and an Inspector. Now we have to find another 450 houses. Why? Was the Inspector led to that conclusion by Waverley? Why couldn't they have been allocated to Dunsfold Park?
Elizabeth Sims	<p>Officers understand the frustration felt – we supported the process in Farnham and celebrated with local councillors when the Neighbourhood Plan was adopted.</p> <p>But, Neighbourhood Plans have to sit in the context of the strategic Local Plan.</p>

	<p>The Inspector went through a technical process to calculate the housing number after a lot of pressure from developers as well as objectors and the Council. Distribution of the additional numbers was a Borough-wide challenge and achieved as equitably and proportionately as possible given the constraints.</p> <p>Waverley didn't pick on particular parts of the borough; the distribution was done in dialogue with the Inspector. It is a bitter pill, but it was never the case that the "made" Neighbourhood Plan would mean Farnham could be excluded from the additional housing allocation.</p> <p>With regards to allocating the extra homes to Dunsfold, it had been a significant issue as to whether the 2,600 homes in the original allocation can be delivered in the Local Plan period. Whilst more homes might be delivered there in a subsequent Plan period, it is not possible to put more there within the timeframe of this Plan. The impact on Farnham is regrettable, but it is a shared responsibility.</p>
Cllr Wheatley	Must remember that the Local Plan stipulates the number of houses, and the Neighbourhood directs where they go.
Cllr Hall	Haslemere Town Council slowed down the development of its Neighbourhood Plan in order for it to confidently sit below the Local Plan, and avoid having to revisit.
Cllr Cockburn	There was a combination of reasons for Farnham getting out of sync with the Local Plan process. Feel that we could have had more support, but we are where we are and will do our best to deliver.
Cllr Hyman	<p>If we don't adopt, what is the impact on the appeals with the Secretary of State? Are the risks to Farnham [of not adopting the Local Plan] different to the risks to Waverley, because of having an adopted Neighbourhood Plan?</p> <p>If the Local Plan is not adopted, is Farnham protected by having a Neighbourhood Plan?</p>
Lewis Jones	If we adopt, there is a 6-week challenge period. It is likely the SoS would wait until after that period before issuing decisions on Appeals.
Daniel Bainbridge	It would be up to the applicants to challenge if appeal decisions are dismissed in the Local Plan challenge period. We simply cannot predict what may happen in those circumstances.

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