

To: All Members and Substitute Members of  
the Joint Overview and Scrutiny  
Committee  
(Other Members for Information)

When calling please ask for:

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Date: 11 November 2016

**Membership of the Joint Overview and Scrutiny Committee**

Cllr Jerry Hyman (Chairman)	Cllr Denise Le Gal
Cllr Michael Goodridge (Vice Chairman)	Cllr Denis Leigh
Cllr Mike Band	Cllr Peter Martin
Cllr Maurice Byham	Cllr Andy MacLeod
Cllr Carole Cockburn	Cllr Sam Pritchard
Cllr Patricia Ellis	Cllr Wyatt Ramsdale
Cllr Mary Forszewski	Cllr David Round
Cllr John Fraser	Cllr Richard Seaborne
Cllr Pat Frost	Cllr Simon Thornton
Cllr Val Henry	Cllr Bob Upton
Cllr Christiaan Hesse	Cllr Ross Welland
Cllr Stephen Hill	Cllr Liz Wheatley
Cllr Nicholas Holder	Cllr Nick Williams
Cllr David Hunter	Cllr John Williamson
Cllr Peter Isherwood	

Dear Councillor

A meeting of the JOINT OVERVIEW AND SCRUTINY COMMITTEE will be held as follows:

DATE: MONDAY, 21 NOVEMBER 2016

TIME: 7pm

PLACE: COUNCIL CHAMBER, COUNCIL OFFICES, THE BURYS,  
GODALMING

The Agenda for the Meeting is set out below.

Yours sincerely

ROBIN TAYLOR  
Head of Policy and Governance

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## **NOTES FOR MEMBERS**

Members are reminded that contact officers are shown at the end of each report and members are welcome to raise questions etc in advance of the meeting with the appropriate officer.

### **AGENDA**

1. **APOLOGIES FOR ABSENCE**

To receive any apologies for absence.

2. **DECLARATIONS OF INTEREST**

To receive from members, declarations of interests in relation to any items included on the agenda for this meeting, in accordance with the Waverley Code of Local Government Conduct.

3. **WAVERLEY BOROUGH LOCAL PLAN PART 1: SUBMISSION** (Pages 5 - 224)

This report provides an update on the progress with Local Plan Part 1: Strategic Policies and Sites, following the recent pre-submission consultation. It also seeks the views of the Joint Overview and Scrutiny Committee, which will be forwarded to the Executive.

**Recommendation**

**That the Joint Overview and Scrutiny Committee considers the report and forwards any comments for consideration by the Executive and Council.**

4. **THE SCOPE OF LOCAL PLAN PART 2: NON-STRATEGIC SITES AND POLICIES** (Pages 225 - 230)

Local Plan Part 1 is the first part of the review of the 2002 Waverley Borough Local Plan. Local Plan Part 2, which will contain day to day development management policies, together with non-strategic allocations of land, will be the second part of the process in replacing the 2002 Local Plan. The Joint Overview and Scrutiny Committee is being asked to consider the scope of the Local Plan Part 2 and pass any comments to the Executive.

**Recommendation**

**That the joint Overview and Scrutiny Committee considers the scope of Local Plan Part 2 and forwards any comments to the Executive.**

5. EXCLUSION OF PRESS AND PUBLIC

To consider the following recommendation of the motion of the Chairman:-

Recommendation

That pursuant to Procedure Rule 20 and in accordance with Section 100A(4) of the Local government Act 1972, the press and public be excluded from the meeting during consideration of the following item(s) on the grounds that it is likely, in view of the nature of the business to be transacted or the nature of the proceedings, that if members of the public were present during the item(s), there would be disclosure to them of exempt information (as defined by Section 100I of the Act) of the description specified in the appropriate paragraph(s) of the revised Part 1 of Schedule 12A to the Act (to be identified, as necessary, at the meeting).

6. ANY ISSUES TO BE CONSIDERED IN EXEMPT SESSION

To consider matters (if any) relating to aspects of any report on this agenda which is it felt may need to be considered in Exempt session.

**For further information or assistance, please telephone  
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## WAVERLEY BOROUGH COUNCIL

### JOINT OVERVIEW AND SCRUTINY COMMITTEE

21 NOVEMBER 2016

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**Title:**

**WAVERLEY BOROUGH LOCAL PLAN PART 1: SUBMISSION**

[Portfolio Holder: Cllr Adams]

[Wards Affected: All]

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**Summary and purpose:**

This report provides an update on the progress with Local Plan Part 1: Strategic Policies and Sites, following the recent pre-submission consultation. It also seeks the views of the Joint Overview and Scrutiny Committee, which will be forwarded to the Executive.

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**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:**

The production of planning policy documents will continue to be managed within existing approved budgets, including the occasional use of consultants to provide specialist support/evidence. There will also be costs associated with the Examination.

**Legal Implications:**

It will be necessary to ensure that when the Local Plan is submitted for Examination, it complies with the relevant legal tests of soundness.

The Inspector will make an initial assessment of the Local Plan once it has been submitted for examination. If the Inspector forms an early view that the submitted Plan may have serious shortcomings, the Inspector will raise this with the local planning authority at an early stage. Where any major concerns are identified, in relation to the duty to cooperate, other procedural requirements or the soundness of the plan, the Inspector will write to the local planning authority setting these out.

The Inspector will give the local planning authority every opportunity to respond to any concerns and address key issues that may lead the Inspector to conclude that the plan is not sound or that a legal requirement has not been met.

Where the Inspector has significant concerns about the soundness of a submitted plan, the Inspector may consider that the examination cannot be completed without additional work being undertaken. This may require consideration of a suspension or partial suspension of the examination process to give the local planning authority time to undertake further work to address the issues raised. Inspectors should make every effort

to engage fully with the local planning authority in meaningful discussions to determine the scope and feasibility of any additional work needed.

If there are no initial concerns, the examination process will proceed.

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## **Introduction**

1. The Local Plan Part 1 sets out the key policies and overall strategy for managing and directing future development in Waverley over the period to 2032. It effectively forms the first part of the replacement of the existing Waverley Borough Local Plan. Following this will be a second document, Local Plan Part 2, which will set out the non-strategic policies and site allocations.

## **Consultation on the Pre-submission Local Plan**

2. In July the Council agreed the Pre-submission version of the Local Plan for publication. That triggered the formal pre-submission consultation, which focused on the 'soundness' of the Plan. This will also be the focus of the Inspector who will 'examine' the Plan once it is submitted. There are certain legal tests that have to be met, based on procedure, including the legal test of whether or not the Council has met the 'Duty to Co-operate'. Officers consider that these have been met. There are additional tests of the Plan itself. The Inspector will be considering whether the Plan is:-
  - Positively Prepared
  - Effective
  - Justified
  - Consistent with national policy
3. Those responding to the pre-submission consultation were asked to link their comments to the legal and other tests of soundness. A total of almost **1,500** separate comments were received from **603** respondents. In addition there were around 2,100 postcard responses derived from a document circulated by the 'Protect Our Waverley' campaign group. These set out various reasons for objecting to the allocation of Dunsfold Aerodrome in the Plan.

## **Issues arising from the consultation on the Pre-Submission Local Plan**

4. Members are reminded that the Local Plan Part 1 has its foundations in the original Core Strategy that was withdrawn from Examination in 2013 on the recommendation of the Inspector. The Core Strategy itself had been subject to extensive consultation and many of the policies in Local Plan Part 1 are an evolution/updating of earlier Core Strategy policies. Members are also reminded that in 2014 there was a consultation on different scenarios for the distribution of new homes within Waverley. That consultation also included the opportunity to comment on other issues relevant to the development of the Local Plan, such as issues around the approach to the Green Belt. The spatial strategy in the new Local Plan, which includes the proposed allocation of the Dunsfold Aerodrome site as a new settlement for 2,600 homes, is an evolution of one of the scenarios consulted on in 2014.

5. Attached as Annexe 1 (to follow) is a schedule setting out, by chapter, the key issues coming out of the latest consultation and the officers' response to these. Some of the key comments arising from the consultation include:

- The objectively assessed need (OAN) for new housing has not been properly identified. In relation to this some argue that the OAN is too high, questioning the need for an uplift relating to affordability and arguing that the Council should take account of the most recent population projections published in June. Others argue that the OAN is not high enough. There are various reasons for this including that it should be higher to take more account of the need for affordable homes, that there should be a greater uplift due to affordability issues and that the plan understates likely economic growth and additional housing needed to support this.
- Some argue that the housing target, (which is the same as the OAN) is too high and does not take account of the various constraints in Waverley.
- Others argue that the housing target is not high enough. Some argue that there should be a buffer to allow for some flexibility and contingency in the event that projected sources of housing supply do not come forward. Examples include non-delivery of identified sites and a perceived over-reliance on windfalls. Some also comment that there is too much reliance on one site (Dunsfold Aerodrome). Linked to this are comments that there are other sites available that the Council could bring forward to deal with a potential future delivery issue.
- Linked to the above are various comments concerning the Duty to Co-operate and, in particular the fact that there are unmet needs within the Housing Market Area (arising from Woking) and that Waverley should be picking this up.
- Some have challenged the distribution of development, with particular reference to the amount of housing being proposed in the Eastern part of the Borough. Various reasons are given for this, including the argument that the locations identified for growth in this area (Cranleigh and Dunsfold Aerodrome) are not sustainable locations.
- In relation to Dunsfold Aerodrome those opposing its development refer to a number of factors, including concerns around infrastructure and the limited scope to improve this.
- Infrastructure generally is raised as an issue. This covers a range of factors. Two of the most prominent are concerns around transport/roads and drainage, including the capacity of sewage treatment works and implications for water quality.
- Some have argued that there has not been sufficient consultation or that previous consultations have been flawed.
- Some have challenged the two-stage process of producing the Local Plan (i.e. Local Plan Parts 1 and 2). Some argue that this reduces certainty about the overall delivery of the strategy. Others argue that decisions on specific matters, such as changes to Green Belt should all be made in Local Plan Part 1 rather than the proposed approach of deferring some decisions to Local Plan Part 2.
- Linked to the above are some challenges around the approach to meeting the needs of Travellers and whether decisions on this should be in Local Plan Part 1 rather than Part 2.

### **Officer response**

6. A number of the issues raised were anticipated and have been addressed through the plan itself and supporting evidence, such as the Sustainability Appraisal (SA). In relation to the issue of the OAN, the various comments made have been considered both by the officers and by GL Hearn, the consultants who carried out the Strategic Housing Market Assessment (SHMA) on behalf of Waverley, Guildford and Woking. In essence this has confirmed that the SHMA is a sound piece of evidence, based on the up-to-date data at the time and that it can be supported through the examination process.
7. In relation to the issue of the housing target, based on the evidence, it is not considered that there is a justification for seeking to argue that the Council is not able to meet its housing needs, notwithstanding the constraints in the Borough, which are recognised. In terms of whether the housing target is too low, officers are confident that the strategy is deliverable and that the Council has not over-stated the amount of windfall development. In addition, the Council has identified in chapter 19 the broad location of where it would seek to bring forward additional sites, if it were to transpire that the required amount of housing was not coming forward from the currently identified sources.
8. In relation to the issue of unmet needs elsewhere, the Council is working with Guildford and Woking Borough Councils to agree a statement of common ground in relation to this. The Council has already considered through the Sustainability Appraisal whether it could meet additional needs from outside the Borough and concluded that it is not able to do so.
9. With regard to the distribution of development, this has been assessed through the Sustainability Appraisal and other evidence. There are a range of factors influencing whether the strategy is sound and taking these into account it is considered that the distribution is appropriate. In terms of infrastructure it is acknowledged that in some locations infrastructure needs to be improved to support development. The Infrastructure Delivery Plan (IDP) will be an important piece of evidence identifying necessary infrastructure to support development. This includes a particular focus on transport and drainage matters.
10. In relation to previous consultations, it is not considered that this is flawed or inadequate. In relation to this, legal advice was sought on the particular issue of whether the Council was able to proceed to the Regulation 19 consultation, having regard to previous consultations, and the advice received was that this was an acceptable approach.
11. In relation to the two-stage approach, this has been the Council's intention for sometime and it is considered that this is reasonable. In particular, it is not considered that this approach puts the deliverability of the strategy at risk. It is also considered reasonable to defer some of the detailed decisions, such as the detailed changes to settlement boundaries around villages in the Green Belt to Part 2 of the Plan. In addition, it is considered that the approach to dealing with Gypsy and Traveller needs, as set out in the Plan, with the details of any new site allocations addressed through Local Plan Part 2, is a reasonable one.
12. Having reviewed the comments made in response to the consultation, officers have identified a number of minor modifications to the text and the policies in the Plan.



These are set out in the table attached as Annexe 2 (to follow) This schedule of modifications will be submitted to the Planning Inspectorate alongside the draft plan itself.

### **Conclusions**

13. The officers have carefully considered the responses to the consultation and have identified some minor changes to improve the plan. In some cases, it has been necessary to refer comments to consultants and to have further discussions with key consultees, such as the Environment Agency, in order to address points raised. This may result in an update to the schedule of comments and the schedule of minor modifications. In the meantime, the Joint Overview and Scrutiny Committee is invited to consider the report and attachments and forward any comments to the Executive and Council.

### **Recommendation**

That the Joint Overview and Scrutiny Committee considers the report and forwards any comments for consideration by the Executive and Council.

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### **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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# Annexe 1

Waverley Borough Council

Local Plan Part 1

Pre - Submission

Summary of key issues raised and  
officer responses by chapter\*

\*Note: No responses were received in relation to  
Appendices B, E and F

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## Chapter 1. Introduction and Context

### Key stakeholders highlighted

Section/ paragraph no./Policy	Key Issues Raised	Council Response
<b>How Local Plan Part 1 has been prepared (General comments)</b>	Civic group [1176] welcome hard and determined work to develop Local Plan. Plan appears legally compliant. Frequent workshops, surveys and exhibitions have engaged the community from the start of the process.	Support welcomed.
<b>Critique of 2014 consultation</b>	POW [356] biased consultation for housing scenarios which is sole justification for spatial strategy and strategic site allocation.	Disagree. The 2014 consultation included scenarios without housing at Dunsfold Aerodrome and the responses to that consultation were taken into account along with other evidence.
	Developer [1347] Seeks to rely on previous drafts of failed core strategy, which cannot be right. 2014 consultation not supported by a Sustainability Appraisal (SA) ( <i>legally non-compliant</i> ) nor by a complete evidence base (SHMA only produced in 2015).	Disagree. 2014 consultation was accompanied by an Interim SA report. Also disagree that the plan relies on the failed core strategy. It is based on that work but has been influenced by more recent evidence.
<b>No Preferred options consultation (Challenging legal compliance).</b>	Developers [1265/1366] & [1291] & [1347] & [1348] <u>Not legally compliant</u> as the plan has not been informed by a Reg 18 consultation. Previous consultations were as part of abandoned Core Strategy and prior to NPPF.	Disagree. It is not a legal requirement to do a Preferred Options consultation. The NPPG allows 'considerable flexibility' on the initial stages of plan preparation. The 2014 consultation satisfies the Regulation 18 requirement.
	POW [356] echoed by individual [477] plan not justified due to flawed and inadequate consultation with inconsistencies and conflicts internal to plan.	Disagree: See above
	Developer [1347] refers to Royal Borough of Windsor and Maidenhead failure to meet legal compliance tests in terms of condensing the Local Plan timetable. Bewley has taken advice from QC which confirms that Waverley will be at same risk. <i>Challenging legal compliance.</i>	Disagree. There is flexibility in the regulations for each LPA to prepare a plan in the way that suits them best. The timetable has not been condensed; it is an evolution of previous work on the core strategy.
<b>Evidence base</b>	Developer [1291] – evidence base should have been	Disagree. Our plan is based on up to date evidence. No

## Chapter 1. Introduction and Context

### Key stakeholders highlighted

	<p>reviewed more comprehensively.</p> <p>POW [356] echoed by individual [477] SHMA is out of date (2013/2017 start dates and does not use latest available DCLG information).</p> <p>POW [356] echoed by individual [477] Technical evidence released July/Aug 2016 during the consultation. Prevented Councillors and Public from giving due consideration.</p>	<p>need to review.</p> <p>Disagree. Do not agree that the plan relies on out of date evidence. The Local Plan has a base date of 1 April 2016.</p> <p>Disagree. The Five Year Land Supply statement published in July was to inform planning decisions, in line with NPPF para 49.</p>
<b>Duty to Co-operate</b>	<p>POW [356] echoed by individual [477] WBC has failed in this duty because of lack of constructive and ongoing dialogue, particularly in relation to Bordon. Would have expected minutes of meetings with both East Hants and Horsham.</p>	<p>Disagree – DtC requirements have been met, as per DtC topic paper.</p>
	<p>Developer [1348] &amp; [1480] WBC has not addressed whether potential exists to meet any unmet need within HMA, particularly Woking (some 225dpa that Guildford said it cannot meet). Clear from SHLAA and SA that there is capacity within Borough. No joint statements with other LPAs in HMA confirming the approach under DtC.</p>	<p>Disagree – DtC requirements have been met, as per DtC topic paper. The three authorities (Waverley, Woking and Guildford) are working closely and are working to produce a statement of common ground on this issue.</p>
<b>SA/SEA/HRA section</b>	<p>Individual [461] Plan relies almost entirely on deliverability of single site, which it does not show is sustainable (issues of 2009 still remain).</p>	<p>Disagree – our assessment is that the strategy is deliverable, with sufficient sites to be delivered in the early part of the plan period to ensure a five year housing land supply.</p>
	<p><b>Surrey County Council</b> [915] Paragraph 1.18 should refer to Policy WD2 of the Surrey Waste Plan 2008 and the sites listed in Table 3.1 (of Waste Plan).</p>	<p>Disagree. Unnecessary detail for an introductory chapter.</p>
	<p>CBRE [1425] We suggest an additional option in the Sustainability Appraisal that accounts for development on the site (a site in Godalming).</p>	<p>Disagree. Options 1&amp;7 do involve development at this site, therefore it has been tested in the SA. Additionally, the SA looked at broad locations of development not just specific sites.</p>

## Chapter 1. Introduction and Context

### Key stakeholders highlighted

	<p>Developer [1480] SA is muddled and biased towards various development scenarios e.g. SA has indirectly assessed Waverley Lane but this site is not included in the LAA. Calls into question the justification for DA when Option 1 (nil at Dunsfold) performs well. SA assumes housing need is 519dpa but actually 744dpa (NLP report). Plus SA accepts that proposed option performs poorly on transport sustainability, housing and economic growth and 5YHLS.</p>	<p>Disagree. AECOM has responded in detail to this rep. SA is a balance of issues, and so just because an option performs well under the housing objectives, the option is not necessarily preferred. The SHMA is based on an established methodology and was undertaken by GL Hearn. They have also reviewed the responses made to this consultation. Again, the SA is a balance of issues; it is used to highlight where changes or mitigation is required and feeds into the IDP.</p>
	<p>Developer [1019] Object to the SA because the Council undertook the development of options without consultation. Also, the OAN set out in the SHMA was published after the Housing Scenarios consultation in 2014 denying an opportunity for the public and stakeholders to consider the scenarios based on the new OAN. Site at 35 Frensham Vale scores well in the SA and should be allocated for 46 dwellings.</p>	<p>Disagree. An Interim SA Report was published for consultation alongside the 'Housing Scenarios' consultation document in 2014. Whilst the SHMA was published subsequent to the 2014 consultation, this is not a procedural flaw. The higher OAN figure arrived at by the SHMA in 2015 did not invalidate the 2014 'Housing Scenarios' stage of plan-making, or create a need for further Regulation 18 consultation.</p>
<p><b>Para 1.14 Waverley Borough Local Plan Saved Policies</b></p>	<p>Council should not continue to save any policies but should use the Local Plan to entirely update them in order to provide maximum clarity for applicants. Some saved policies might have strategic implications. Those in rural areas could have implications for the delivery of the housing requirement. Unacceptable to delay replacing these until Part 2.</p>	<p>Disagree- SoS direction 2007 does not state that they become out of date on adoption of new plan, particularly LPP1. It does state that the saved policies should be read in context as it is likely that new national and regional policy would have considerable weight. Saved policies will continue to be saved until the adoption of LPP2. Disagree that if policies are old, they are automatically out of date or do not comply with the NPPF.</p>
<p><b>Para 1.20/ LEPs</b></p>	<p><b>Surrey Nature Partnership.</b> [1029] Local Enterprise Partnerships receive due recognition with their own paragraph, therefore why is this not similarly extended to Local Nature Partnerships?</p>	<p>Agreed. Addition to be made.</p>

**Chapter 2: Spatial Portrait**  
**Key Stakeholders highlighted**

Section/ paragraph no./Policy	Key Issues Raised	Council Response
<b>Roads and Transport generally</b>	<ul style="list-style-type: none"> <li>• Spatial Portrait underestimates problems with A3, A281 and A31.</li> <li>• Relies on visions and schemes which are not committed or funded.</li> <li>• 2.22 refers to the impact of HGVs on communities, but does not provide a solution.</li> <li>• Plan does not address infrastructure issues (increased traffic/ safety for pedestrians/ pollution/ speeds.</li> <li>• Developments in West Sussex not taken into account.</li> <li>• Sever traffic impacts which haven't been taken into account, social, environmental and economic.</li> <li>• Need for park and ride (generally).</li> <li>• Object to Brightwells and congestion and pollution in Farnham.</li> </ul>	<p>The Spatial Portrait is intended to be a snapshot of the characteristics and problems facing the Borough. As such, it contains no policies or solutions.</p>
<b>2.22 and 2.23</b>	<ul style="list-style-type: none"> <li>• Section on roads only refers to motorised traffic and fails to acknowledge other users.</li> <li>• Significant problems in Haslemere on B2123 and A287 in Weyhill due to increased population and increased station usage. Should be mentioned alongside others listed in para 2.23 or will go unrecognised.</li> </ul>	<p>Provision for pedestrians and cyclists is discussed in para 7.9 of Chapter 7 Sustainable Transport.</p> <p>No change required currently. Review if evidence comes forward.</p>
<b>Haslemere</b>	<ul style="list-style-type: none"> <li>• Character of some commercial areas is changing due to relaxation of permitted development rights, impacts on on-street parking.</li> </ul>	<p>Noted.</p>
<b>Ethnic Groups 2.6</b>	<ul style="list-style-type: none"> <li>• Despite referring to Gypsy and Traveller community the plan does not give enough attention to their needs throughout the document. (Surrey Gypsy and Traveller Communities Forum).</li> </ul>	<p>Chapter 9 Paragraphs 9.45 – 9.50 and Policy AHN4 deals specifically with the requirements of Gypsies, Traveller and Travelling Showpeople.</p>
<b>Health 2.8</b>	<p>Most village residents <u>will</u> have to travel by car to</p>	<p>Plan does state that some residents will need to travel</p>



**Chapter 2: Spatial Portrait**  
**Key Stakeholders highlighted**

	nearest health facility.	by car, but several of Waverley's villages do have their own GP surgeries/ health centres.
<b>Health 2.8</b>	<b>Guildford and Waverley Clinical Commissioning Group (CCG)</b> state that discussion about further provision for health care facilities is required as without this the Plan may not be considered sound.	This point has also been made by CCG in Chapter 8.
<b>Education 2.9</b>	<ul style="list-style-type: none"> <li>Access to sixth form colleges in Farnham, Godalming and Guildford will not service those living in east of Borough or Dunsfold.</li> </ul>	Catchment of areas for further education also extends into West Sussex where there are several accessible sixth form colleges.
<b>Environmental Profile 2.13</b>	<ul style="list-style-type: none"> <li>SSSIs are not detailed here.</li> </ul>	The Spatial Portrait is intended to be a snapshot of the general characteristics, and is not the place for detailed lists of designated nature sites. This information is however, available from Waverley.
<b>Housing 2.27 and 2.28</b>	<ul style="list-style-type: none"> <li>Given reference to SHMA here, there should also be a reference to the Traveller Accommodation Assessment (TAA) and its findings.</li> </ul>	The TAA and its findings have been referred to in the specific section on Gypsies, Travellers and Travelling Showpeople in Chapter 9 (paras 9.45 – 9.50 and Policy AHN4). However, a reference to this group is suggested for para 2.28.
<b>Housing 2.28</b>	<ul style="list-style-type: none"> <li>Mention is needed of difficulty of finding homes of a suitable size / style for older people to downsize to in order to release family homes.</li> </ul>	In this part of the Local Plan there is no need to set out every characteristic of the Borough that will provide the context for strategic policy. Subsequently, Chapter 9 deals with housing needs and Policy AHN3 deals with housing types and size. This specifically mentions the evidence of need for specialist housing or housing to meet the requirements of older persons.
<b>Economic Profile 2.29</b>	<ul style="list-style-type: none"> <li>Local Plan needs to address declining employment opportunities.</li> </ul>	The Spatial Portrait is intended to be a snapshot of the characteristics of the Borough. Chapter 10 deals with the economy in more detail.
<b>Cross Border Issues 2.34</b>	<ul style="list-style-type: none"> <li>Following adoption of East Hants Joint Core Strategy, term 'eco-town' has become redundant. The project is now known as a 'green town'.</li> </ul>	Amend reference accordingly.
<b>Cross Border Issues 2.34</b>	<ul style="list-style-type: none"> <li>Does not describe what cross-boundary issues there are, other than those outside the SHMA.</li> <li>Spatial Portrait avoids making any reference to the</li> </ul>	Referred to Chapter 6 Policy ANH1.  The SHMA has tested London migration which has

**Chapter 2: Spatial Portrait**  
**Key Stakeholders highlighted**

	influence of London although does discuss its rail links. Although SHMA has a London Migration scenario it does use it in its demographic projections.	increased the number of new homes needed per year by 12. However it is not certain that it will occur.
<b>Culture 2.38</b>	<ul style="list-style-type: none"> <li>Statement relating to provision lacks ambition and vision. New Cultural Strategy aims to give culture a higher profile and should be mentioned in the Spatial Vision.</li> </ul>	The Spatial Portrait is intended to be a snapshot of the characteristics of the borough as it is. Amendments have been suggested in various locations in the Local Plan to include reference to Waverley's new Cultural Strategy.
<b>Economic Profile 2.33/ 7.11</b>	<ul style="list-style-type: none"> <li>What practical measures is Waverley taking to support provision of high speed broadband?</li> </ul>	Waverley is continually working with partners to bring broadband to rural parts of the Borough. Para 2.33 explains what the aims and timescales are.
<b>Tourism 2.40</b>	<ul style="list-style-type: none"> <li>Wings and Wheels cannot be considered as a long-term tourist attraction if Dunsfold development goes ahead.</li> </ul>	Noted.
<b>Tourism 2.40</b>	<ul style="list-style-type: none"> <li>No mention of Haslemere becoming a gateway to the South Downs National Park and the need to deal with demand for accommodation and visitors.</li> </ul>	Mention of Waverley's proximity to the South Downs National Park throughout the Local Plan, however, the fact that Haslemere is considered to be a gateway to the South Downs National is important and should be included in the Tourism section of the Spatial Portrait.
<b>Tourism 2.40</b>	<ul style="list-style-type: none"> <li>Fails to refer to annual events at Hurtwood Polo Club.</li> </ul>	The Spatial Portrait is intended to be a snapshot of the characteristics of the Borough. It would not be appropriate to list all annual events that take place in Waverley.
<b>Issues and Challenges 2.42</b>	<ul style="list-style-type: none"> <li>Housing. Makes no mention of fact that providing sites for Gypsies and Travellers is either an issue or a challenge.</li> <li>Social Inclusion makes no reference to that between settled community and Gypsies and Travellers.</li> </ul>	The issues and challenges section on housing mentions that 'it is also necessary to recognise the specific accommodation and housing needs of different groups in the local community'. This is a broad statement to set the context for the Local Plan so it is not required to specifically mention the needs of the different groups. Subsequent chapters in the Local Plan then set out in more detail the specific issues, including Chapter 9 that deals with traveller accommodation.
<b>General objections to</b>	<ul style="list-style-type: none"> <li>Plan does not address infrastructure issues if</li> </ul>	See relevant responses in Chapters 5, 6 and 18

**Chapter 2: Spatial Portrait**  
**Key Stakeholders highlighted**

<b>Dunsfold Aerodrome site</b>	Dunsfold is developed. <ul style="list-style-type: none"><li>• Object to Local Plan because it is based almost completely on the deliverability of a large single site.</li><li>• Lack of appraisal of other sites.</li><li>• Far exceeds housing needs of Waverley.</li><li>• Comment on provision of infrastructure for Dunsfold. Agree with lack of affordable housing but should be provided in areas of employment and local infrastructure, not a new rural settlement.</li><li>• No intention of creating access to trains in east of Borough.</li></ul>	
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**Chapter 3 – Spatial Vision**  
**Key stakeholders highlighted**

Section/ paragraph no./Policy	Key Issues Raised	Council Response
Spatial Vision	<p><b>General principles [Support]</b></p> <ul style="list-style-type: none"> <li>Support Spatial Vision and Objectives which identify that most development will take place around Farnham and main settlements.</li> <li>Support the vision and objectives and the need for ‘a range of sizes, types and tenures of new housing and accommodation’ which includes a specific reference to the accommodation needs of the older population ‘that will have increased significantly’.</li> </ul> <p><i>(Cove Construction, 552); (The National Trust, 845); (Sentinel Housing Association, 957); (Individual, 1117); (Gladman Developments); (Elm Group, 1393).</i></p>	Support welcomed.
Spatial Vision	<p><b>General principles [Oppose]</b></p> <ul style="list-style-type: none"> <li>Oppose on basis of jobs, employment land assessment inaccurate and out-of-date, sustainable transport options minimal, water and air quality not adequately evidenced, Cranleigh is receiving disproportionate amount of housing, development is developer-led not plan-led, revised climate change allowances not taken into account.</li> </ul> <p><i>(Cranleigh Civic Society, 1096)</i></p>	Disagree. The ELR is not based on out of date data. Do not agree that the Spatial Strategy is unsound or unbalanced. As explained in 5.25, the Strategy does not distribute development evenly across the Borough. This is due to a range of factors, in particular the constraints that apply. Several options were tested through the SA and this found options that distribute development more evenly would perform poorly in terms of certain objectives.
Spatial Vision	<p><b>Growth principles [Support]</b></p> <ul style="list-style-type: none"> <li>The approach of concentrating the majority of new development at the four main settlements of Farnham, Godalming, Haslemere and Cranleigh is supported.</li> <li>The acknowledgment of the need for and the</li> </ul>	Support welcomed.

**Chapter 3 – Spatial Vision**  
**Key stakeholders highlighted**

	<p>acceptability of greenfield peripheral development on the edge of the main settlements (particularly Farnham) is supported.</p> <ul style="list-style-type: none"> <li>• Local Plan needs to provide the policy context and support development at other settlements in order to help maintain and enhance their vibrancy and vitality. <ul style="list-style-type: none"> <li>○ Furthermore this approach is necessary in order to ensure the availability of a range of house types and locations within the Borough in order to cater for different groups of the community.</li> </ul> </li> <li>• Development of this size will have major impact on community infrastructure. Detailed plans are required to cope with increased capacity for services , how will these happen and at what cost?</li> </ul> <p><i>(Cove Construction, 557,48, 49, 50); (David Parton, 431).</i></p>	
<p><b>Spatial Vision</b>  General 3.2 – vision statement  Point 7</p>	<p><b>Objectively Assessed Need for housing</b></p> <ul style="list-style-type: none"> <li>• Needs a reference to traveller accommodation</li> <li>• Council should not require all housing development within the Borough to reflect the needs highlighted within the SHMA. <ul style="list-style-type: none"> <li>○ Such an approach would fail to provide any context for the delivery of development which is able to respond appropriately to local character and context.</li> </ul> </li> <li>• Concern that the Local Plan is not fully dealing with the issues of the Borough and fail to adequately address the issues set out within the spatial vision. <ul style="list-style-type: none"> <li>○ In particular the proposed supply of additional homes will not fully meet the OAN for the district.</li> </ul> </li> </ul>	<p>Disagree. The vision for housing sets out a broad vision and is not specific about those who need housing and how those needs are going to be met.</p> <p>The Vision for housing states that the purpose is to meet the housing needs of different groups and the local community. It only specifies older persons on the grounds that there is demographic evidence of an ageing population in the Borough and that will need to be addressed. This is not to say that it will ignore other groups that have specific needs. The Plan intends to meet these but the chapter on the Spatial Vision is broad in its approach rather than specific. Subsequent chapters then set out the detailed policies to meet this vision.</p>

**Chapter 3 – Spatial Vision**  
**Key stakeholders highlighted**

	<ul style="list-style-type: none"> <li>• There is considerable scope for significant delivery of rent to buy homes across Waverley where the Council supports this. <ul style="list-style-type: none"> <li>○ improvements to scheme viability and saleability whilst still meeting local housing needs and aspirations. The Council can afford to be more ambitious in its Vision.</li> </ul> </li> </ul> <p><i>(Surrey Gypsy and Traveller Communities Forum, 876); (Cove Construction, 557); (Gladman Developments, 969); (Tetlow King Planning, 551).</i></p>	
<p><b>Spatial Vision</b>  3.2 – vision statement  Points 2,3,10</p>	<p><b>Dunsfold [opposed]</b></p> <ul style="list-style-type: none"> <li>• Objects to the reference to the new settlement of 2,600 homes at Dunsfold Aerodrome.</li> <li>• Dunsfold allocation conflicts with 3.2.10 on conserving rich heritage and attractive landscape.</li> <li>• High level view should not include specific outcome such as the allocation of a new settlement at Dunsfold.</li> <li>• A new site for 2,600 homes at Dunsfold is not sustainable. Support release of greenfield land on edge of settlements such as Coxbridge Farm.</li> <li>• Failure to categorise the settlement hierarchy of Dunsfold with the Dunsfold Aerodrome Development, policy conflict between ST1(1) and SS7(a).</li> </ul> <p><i>(Individual, 30); (Individual, 1117); (Wonersh Parish Council, 1129); (Sentinel Housing Association, 957); (Individual, 171).</i></p>	<p>Disagree. The SA concluded that the preferred option, which includes 2600 dwellings at DA, on balance, represents sustainable development.</p> <p>The Council considers that Dunsfold Aerodrome is predominantly brownfield. A minor modification will be made to Chapter 18 to ensure that impacts on the setting of the AONB are addressed.</p>
<p><b>Spatial Vision</b>  3.2 – vision statement  Points 2,3,10</p>	<p><b>Dunsfold – Sustainability</b></p> <ul style="list-style-type: none"> <li>• It is not demonstrated that the chosen strategy – using Dunsfold Aerodrome as the key Strategic Site – is better than other alternatives, manages risks to delivery of the Plan and brings benefits</li> </ul>	<p>Disagree. The SA concluded that the preferred option, which includes 2600 dwellings at DA, on balance, represents sustainable development.</p>

**Chapter 3 – Spatial Vision**  
**Key stakeholders highlighted**

	<p>that outweigh costs to the community (the NPPF balanced test of sustainability has not been properly applied).</p> <ul style="list-style-type: none"> <li>• Development at Dunsfold Park is not sustainable and has already been refused previously. No explanation has been given as to how/why this is now "sustainable".</li> <li>• The vision should not be about one issue: housing. Sustainability is the golden thread running through NPPF and demands that the vision takes a holistic view of all the components in the plan.</li> </ul> <p><i>(Individual 1186); (Individual, 584); (Dunsfold Parish Council).</i></p>	
<p><b>Spatial Vision</b></p>	<p><b>Dunsfold – Transport and mobility</b></p> <ul style="list-style-type: none"> <li>• Failure to identify transport requirements beyond 2032 and to protect the prospectively required traffic corridors.</li> <li>• Any development at Cranleigh will be car dependent as there is little public transport and no rail link.</li> <li>• No explicit reference to health and well-being. The reduction of the need to travel will also be financially beneficial to those on low incomes and can help to reduce air pollution and potential risks to health.</li> <li>• It will not be possible to walk to Dunsfold Aerodrome due to distance and safety; cycling is dangerous as there are no cycle lanes anywhere nearby.</li> </ul> <p><i>(Individuals 171 &amp; 621), (Surrey County Council).</i></p>	<p>Disagree. Transport is a challenge in this part of the Borough and we are working closely with Surrey Council Council to identify the mitigation required to address congestion and safety concerns. The Surrey County Council Strategic Highways Assessment is a joint assessment of the impact of both Waverley and Guildford Borough Council's proposed Local Plans. There has been cooperation and meetings with Guildford Borough Council. Policy ICS1 also states that infrastructure considered necessary to support new development must be provided on site, off site or through financial contributions.</p>
<p><b>Spatial Vision</b> General 3.2 – vision statement</p>	<p><b>Health</b></p> <ul style="list-style-type: none"> <li>• Greater emphasis needed for health services in</li> </ul>	<p>Disagree that points 2 need specific mention of health services. The words 'community facilities' and</p>

**Chapter 3 – Spatial Vision**  
**Key stakeholders highlighted**

<p>Points 2 and 5</p>	<p>this section, particularly in points 2, and 5.</p> <ul style="list-style-type: none"> <li>• Suggest further discussion may be required.</li> </ul> <p><i>(Guildford and Waverley Clinical Commissioning Group, 1398)</i></p>	<p>‘services’ includes healthcare. Agree that recognition of healthcare facilities would be useful to include in point 5. <i>Minor mod.</i> Support the idea of further discussion as and when required.</p>
<p><b>Spatial Vision</b></p>	<p><b>Biodiversity</b></p> <ul style="list-style-type: none"> <li>• “The rich biodiversity of Waverley will have been preserved and where possible enhanced, etc. 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”.</li> </ul> <p><i>(Surrey Wildlife Trust, 940); (Surrey Nature Partnership, 1002)</i></p>	<p>Support welcomed. Agree to the prominence given to maintaining quality. <u>[See minor modification schedule]</u></p>
<p><b>Spatial Vision</b>          General 3.2 – vision statement          Points 2-12</p>	<p><b>Culture</b></p> <ul style="list-style-type: none"> <li>• The new Cultural Strategy 2016 -2026 aims to give culture a higher profile in the Borough and as such should feature in chapter 3 Spatial Vision.</li> </ul> <p><i>(Farnham Theatre Association, 1095)</i></p>	<p>Agree that culture is a high priority but until the Cultural Strategy is fully adopted via Full Council in the New Year, reference here is premature. Decision has already been made to include reference to it in Chapter 12 once adopted. <i>Future minor mod.</i></p>
<p><b>Spatial Vision</b>          3.2 – vision statement          Points 2,3,10</p>	<p><b>Duty to Cooperate</b></p> <ul style="list-style-type: none"> <li>• Does not incorporate and discussions with Guildford Borough on how to integrate the Dunsfold Aerodrome development with proposed housing developments to the north of Guildford.</li> <li>• Does not consider the impact of Guildford developments in Artington and Shalford Parishes on Godalming.</li> </ul> <p><i>(Individual, 171)</i></p>	<p>Disagree – DtC requirements have been met, as per DtC topic paper.</p>
<p><b>Spatial Vision</b></p>	<p><b>Local Plan Process</b></p> <ul style="list-style-type: none"> <li>• Disappointed not to have been adequately consulted and missed out of member visits</li> </ul>	<p>Noted but we do not agree that additional consultation was necessary. The Council took legal advice on this.</p>



**Chapter 3 – Spatial Vision**  
**Key stakeholders highlighted**

	summer 2014. <i>(Cranleigh Civic Society, 1096)</i>	
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## Chapter 4 – The Local Plan Objectives

### Key Stakeholders highlighted

Section/ paragraph no./Policy	Key Issues Raised	Council Response
General principles	<p><b>Support</b></p> <p><i>(Individual, 43)</i></p>	Support welcomed.
Objective 2	<p><b>Delivering housing</b></p> <ul style="list-style-type: none"> <li>• 20% buffer required to help emphasise delivery in the early years of the plan period.</li> <li>• Supports the delivery of 'at least' 9,861 dwellings, the text should be amended to state that the annual requirement is a 'minimum' of 519 homes a year.</li> </ul> <p><i>(Cove Construction, 51, 558); (Bargate Homes Ltd, 996); (Bewley Homes Plc, 1349).</i></p>	<p>Disagree – a buffer is not considered necessary because there has not been a persistent under-delivery.</p> <p>The use of a buffer applies to demonstrating that the Council has five years worth of housing supply to meet the housing requirement in accordance with the NPPF.</p> <p>The wording of Objective 2 includes “to support the delivery of at least 9861 new homes”</p>
Objective 2	<p><b>Objectively Assessed Need for housing (OAN)</b></p> <ul style="list-style-type: none"> <li>• Consultants recently reviewed the objectively assessed housing need (OAN) and found it to be significantly overstated. <ul style="list-style-type: none"> <li>○ Request that Waverley investigate this in more detail, to produce a more accurate projection of the amount of new homes needed to be built in the plan period.</li> </ul> </li> <li>• With reference to the identified quantum of new housing required in Waverley to 2032. Are you (in parallel with some neighbouring authorities) planning to re-visit this identified need, post the EU Referendum decision in June and in respect of the now altered multipliers applied by net immigration forecasts?</li> <li>• The report entitled 'Review of West Surrey SHMA</li> </ul>	<p>Consultants GL Hearn, who produced the SHMA, consider that the approach in the West Surrey SHMA is one that reflects the NPPF and NPPG and remains a sound basis for planning.</p> <p>The discrepancy regarding the map relates to the CLG defined boundaries rather than the boundary of the Borough which is what GL Hearn used which is more up to date than the CLG work.</p> <p>The definition of traveller has changed as a result of the PPTS. As such although the TAA was updated in 2016, it was based on the evidence from the TAA of 2014. As part of the work for identifying and allocating sites for traveller accommodation in Part 2 of the Local Plan the Council will be looking to update the evidence of need and supply of traveller</p>

## Chapter 4 – The Local Plan Objectives

### Key Stakeholders highlighted

	<p>as it relates to the Objectively Assessed Needs of Waverley' by NMSS, September 2016, makes it clear that Waverley have used incorrect data when calculating the housing requirement. if the correct numbers are used, then Dunsfold Aerodrome is not required for housing.</p> <ul style="list-style-type: none"><li>• The area in which Dunsfold Aerodrome is sited is outside the Housing Market Area shown on Fig 2 in the report dated September 2015 by GL Hearn. This is because the population of Alfold tends to relate to West Sussex for services such as GP's, education and retail. Does this mean that any houses built in Alfold (including DA) will, in fact contribute to the Crawley/Horsham housing target? Also, the same map shows that the Bordon area is in the Waverley HMA area, so should Waverley be counting these houses towards their target?</li><li>• Concern that the Local Plan Objectives are not fully dealing with the issues of the Borough and fail to adequately address the issues set out within the spatial vision. In particular the proposed supply of additional homes will not fully meet the OAN for the district.</li><li>• Housing target is too high in order to be sustainable.</li><li>• Similar to the objective housing target there should be a target for provision of Gypsy and Traveller pitches in accordance with the TAA.</li></ul> <p><i>(Individual, 1119); ( Individual , 427); (Individual , 388); (Surrey Wildlife Trust, 941); (Surrey Nature Partnership, 1005); (PLOT Farnham, 1450); (Individual,, 592); (Surrey Gypsy and Traveller Communities Forum, 878).</i></p>	<p>accommodation in a new TAA using the new definition. This evidence will inform an up to date target for Part 2 of the Local Plan.</p>
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## Chapter 4 – The Local Plan Objectives

### Key Stakeholders highlighted

<p><b>Objective 3</b></p>	<p><b>Development in villages [support in principle]</b></p> <ul style="list-style-type: none"> <li>This is consistent with the Chiddingfold Neighbourhood Plan objectives and therefore this Council supports it overall; however the point needs to be made that it is not just rural businesses this Council wishes to sustain, but all employment in rural areas, to ensure that Chiddingfold does not become a dormitory community.</li> </ul> <p><i>(Chiddingfold Parish Council, 1196); (Cove Construction, 558).</i></p>	<p>Support welcomed. Spatial strategy has been informed by a Settlement Hierarchy, which includes proximity to jobs.</p>
<p><b>Objective 3</b></p>	<p><b>Development in villages [oppose]</b></p> <p>Comment relates to concerns of Alfold and Dunsfold Parish Councils but not raised by Parish Councils directly.</p> <p><i>(DWL Associates, 1310).</i></p>	<p>Noted but unclear what the issue is. Has been cross-referenced with comments from those two Parish Councils but nothing specific raised.</p>
<p><b>Objective 4</b></p>	<p><b>Settlement at Dunsfold Aerodrome [oppose]</b></p> <ul style="list-style-type: none"> <li>Object to commit to delivery of 9,861 homes by 2032 without major investment in transport infrastructure. Without this Dunsfold settlement would be unsustainable.             <ul style="list-style-type: none"> <li>As other alternatives in the SA have been discarded. OAN should be limited on that meeting the figure of 9861 is unsustainable in accordance with NPPF para 14.</li> </ul> </li> <li>No satisfactory definition of "appropriate infrastructure and mitigation"</li> <li>Large scale of the development will clearly spoil the environment and setting of the southern edge of the AONB.</li> <li>Absence of adequate 'up-front' testing .</li> <li>Any reliance upon Dunsfold is a high risk strategy.</li> <li>Land at Dunsfold Aerodrome should have been</li> </ul>	<p>Disagree. The SA concluded that the preferred option, which includes 2600 dwellings at DA, on balance, represents sustainable development.</p> <p>Disagree – our assessment is that the strategy is deliverable, with sufficient sites to be delivered in the early part of the plan period to ensure a five year housing land supply.</p> <p>Policy ICS1 states that infrastructure considered necessary to support new development must be provided on site, off site or through financial contributions.</p>

## Chapter 4 – The Local Plan Objectives

### Key Stakeholders highlighted

	<p>returned to agricultural use after WW2.</p> <ul style="list-style-type: none"> <li>Development of a Dunsfold Aerodrome site conflicts with policies on protecting green belt and AONB.</li> </ul> <p><i>(Wonersh Parish Council, 1130); (Chiddingfold Parish Council, 1196); (PLOT Farnham, 1450); (Individual, 338); (Bargate Homes limited, 996); (Bewley Homes Plc, 1349); (DWL Associates, 1310); (Individual, 1119); (Individual, 637).</i></p>	
<b>Objective 4</b>	<p><b>Settlement at Dunsfold Aerodrome [support]</b></p> <ul style="list-style-type: none"> <li>Support the development of suitable brownfield land, including a new settlement at the Dunsfold Aerodrome site subject to appropriate infrastructure and mitigation.</li> </ul> <p><i>(Godalming Town Council, 1131).</i></p>	Support welcomed.
<b>Objective 5</b>	<p><b>Health</b></p> <ul style="list-style-type: none"> <li>Greater emphasis needed for health services in this section and reference to community health need.</li> </ul> <p><i>(Guildford and Waverley Clinical Commissioning Group, 1399).</i></p>	Noted but disagree that specific reference is needed. Implicit in 'sustainable communities' (point 2) and 'infrastructure provision' (point 5)
<b>Objective 5</b>	<p><b>Transport</b></p> <ul style="list-style-type: none"> <li>Seemingly a complete disregard to Guildford BC with regard to the traffic impact on the Guildford Gyrotory and A3 beyond.</li> </ul> <p><i>(DWL Associates, 1310).</i></p>	Disagree. The Surrey County Council Strategic Highways Assessment is a joint assessment of the impact of both Waverley and Guildford Borough Council's proposed Local Plans. There has been cooperation and meetings with Guildford Borough Council. This process has informed the IDP.
<b>Objective 6</b>	<p><b>Transport [support]</b></p> <ul style="list-style-type: none"> <li>Support for measures to promote sustainable transport.</li> </ul> <p><i>(Godalming Town Council, 1131).</i></p>	Support welcomed.

## Chapter 4 – The Local Plan Objectives

### Key Stakeholders highlighted

Objective 7	<p><b>Green Belt [support]</b></p> <ul style="list-style-type: none"> <li>Support for maintaining and protecting areas of the Green Belt that fulfil the purpose of their designation.</li> </ul> <p><i>(Godalming Town Council, 1131).</i></p>	Support welcomed.
Objective 8	<p><b>Special character and landscape</b></p> <ul style="list-style-type: none"> <li>There no longer appears to be an objective to protect the peace and tranquillity of the countryside. There is a statutory duty to maintain peace and tranquillity in the AONB.</li> </ul> <p><i>(Chiddingfold Parish Council, 1196).</i></p>	Disagree. Objective 8 includes protecting the countryside for its intrinsic character which would include peace and tranquillity where appropriate. Objective 9 describes appropriate protection to AONB. Policy RE3 refers to character and qualities of the AONB so the issue is addressed within the Plan.
Objective 9	<p><b>National Landscape Designations</b></p> <ul style="list-style-type: none"> <li>The NPPF clearly states that National Parks, the Broads and Areas of Outstanding Natural Beauty should have the highest status of protection in relation to landscape and scenic beauty.</li> <li>Considering local designations on a par with national designations is contrary to the NPPF and therefore this part of the Local Plan is unsound.</li> </ul> <p><i>(DWL Associates, 1310); (PLOT Farnham, 1450).</i></p>	Disagree that this objective gives equal weight to national and local landscapes. Chapter 13 provides the detail and demonstrates that our approach is NPPF compliant.
Objective 10	<p><b>Infrastructure [support]</b></p> <ul style="list-style-type: none"> <li>Support that adequate provision is made for new infrastructure to meet the needs of the increased population.</li> </ul> <p><i>(Godalming Town Council, 1131).</i></p>	Support welcomed.
Objective 11	<p><b>Affordable housing [support]</b></p> <ul style="list-style-type: none"> <li>Support for delivering affordable housing and meeting the needs of the community.</li> </ul> <p><i>(Godalming Town Council, 1131).</i></p>	Support welcomed.
Objective 11	<b>Health</b>	Disagree. This is not the most appropriate objective

## Chapter 4 – The Local Plan Objectives

### Key Stakeholders highlighted

	<ul style="list-style-type: none"> <li>Greater emphasis needed for health services in this section and reference to community health need.</li> </ul> <p><i>(Guildford and Waverley Clinical Commissioning Group, 1399).</i></p>	for health.
<b>Objective 12</b>	<p><b>Housing delivery and mix</b></p> <ul style="list-style-type: none"> <li>The Local Plan should not contain policies which seek to constrain or dictate, in a prescriptive way, the range of house types and sizes that should be provided on a particular site.</li> <li>Support for the delivery of a range of sizes and types of new homes and accommodation.</li> <li>Supports the delivery of 'at least' 9,861 dwellings, the text should be amended to state that the annual requirement is a 'minimum' of 519 homes a year.</li> </ul> <p><i>(Cove Construction, 53, 558); (Godalming Town Council, 1131).</i></p>	Disagree. Local plans should include policies on housing mix to suit local need. It is implicit in the Policy that these allocations are minima.
<b>Objective 12</b>	<p><b>Gypsies and Travellers</b></p> <ul style="list-style-type: none"> <li>Reference to Gypsies and Travellers should be included when talking about supporting accommodation needs of specific groups.</li> </ul> <p><i>(Surrey Gypsy and Traveller Communities Forum, 878).</i></p>	Agree. Proposed Modification. Add reference at end of sentence to Travellers.
<b>Objective 13</b>	<p><b>Employment [support]</b></p> <ul style="list-style-type: none"> <li>Support safeguarding existing employment accommodation and support the delivery of new and improved commercial premises.</li> </ul> <p><i>(Godalming Town Council, 1131).</i></p>	Support welcomed.
<b>Objective 16</b>	<p><b>Heritage</b></p> <ul style="list-style-type: none"> <li>The proposed text should be amended as set out</li> </ul>	Agreed. <u>Minor mod.</u>

## Chapter 4 – The Local Plan Objectives

### Key Stakeholders highlighted

	<p>in response to question 3 below to make it compliant with the NPPF that does not use the word 'rich' in describing heritage assets, landscapes or townscapes in Sections 11 and 12.</p> <ul style="list-style-type: none"> <li>Proposes new text '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'.</li> </ul> <p><i>(PLOT Farnham, 1450).</i></p>	
<b>Objective 18</b>	<p><b>Biodiversity [support]</b></p> <ul style="list-style-type: none"> <li>“To protect and enhance Waverley’s biodiversity, including its wildlife species and their habitats, both on designated sites such as the Thames Basin Heaths and Wealden Heaths (Phases 1 and 2) Special Protection Areas, and on undesignated sites.” This is welcomed.</li> </ul> <p><i>(Surrey Wildlife Trust, 941); (Surrey Nature Partnership, 1005).</i></p>	Support welcomed.
<b>Objective 19</b>	<p><b>Climate change / Dunsfold</b></p> <ul style="list-style-type: none"> <li>Increased traffic from Dunsfold would contribute to climate change.</li> </ul> <p><i>(DWL Associates, 1310).</i></p>	Disagree. The SA concluded that the preferred option, which includes 2600 dwellings at DA, on balance, represents sustainable development. Policy ICS1 also states that infrastructure considered necessary to support new development must be provided on site, off site or through financial contributions.
<b>General</b>	<p><b>Duty to Cooperate</b></p> <ul style="list-style-type: none"> <li>This is a deficiency of the principal objectives and an indicator that the report fails to recognise the significance of the Neighbourhood Plans and associated local powers and issues - in my view this is indicative of a failure of the duty to co-</li> </ul>	Disagree – DtC requirements have been met, as per DtC topic paper.



## Chapter 4 – The Local Plan Objectives

### Key Stakeholders highlighted

	<p>operate.</p> <p><i>(Jeffrey Hogg, 28).</i></p>	
<b>General</b>	<p><b>Education</b></p> <ul style="list-style-type: none"> <li>• Amendments should be made to highlight importance of education (incl Higher and Further Education), in line with NPPF paras 6 &amp; 7.</li> </ul> <p><i>HE/FE Institution (931)</i></p>	Disagree. Education is implicit in objective 1 on sustainable development.
<b>General</b>	<p><b>Sustainable development on strategic sites</b></p> <ul style="list-style-type: none"> <li>• The Local Plan is strong on references to sustainable development but short on policies for assessing potential strategic sites against sustainability criteria and for accommodating new developments in a sustainable way.</li> <li>• It is therefore difficult to see how it will contribute to the achievement of sustainable development within Waverley.</li> </ul> <p><i>(Hambledon Parish Council, 1061).</i></p>	Disagree. SA tested several spatial strategy options, including strategic sites. SA concludes that preferred option, on balance, represents SD.

## Chapter 5 Spatial Strategy

### Key stakeholders highlighted

Section/ paragraph no./Policy	Key Issues Raised	Council Response
<b>Introduction</b>	<i><b>Summary:</b> Only one comment was received on this section. It was a general comment recognising the role of the Plan is providing a framework until 2032 to meet both housing and commercial needs, whilst protecting the environment and countryside. Another was a request from a developer to address to status of the Local Plan in relation to previous plans in Waverley. No changes to the plan are required.</i>	
<b>Introduction</b>	Individual [502] Plan is a welcome step in providing framework to 2032; meets both housing and commercial needs while protecting environment and countryside.	Noted and welcomed.
<b>Introduction</b>	Individual [505] Preference against large sites in the village – sympathetic development preferable.	Noted.
<b>South East Plan 2009</b>	No comments	
<b>National Policy Context</b>	<i><b>Summary:</b> Developers commenting on this section requesting clarification of the context of the Local Plan given the 'policy vacuum' since 2006. Respondents requests removal of reference to the saved policies from the Local Plan 2002 as they are inconsistent with the NPPF. A specific request was received relating to referring to the National Planning Policy on travelling sites.</i>	
<b>National Policy Context</b>	Developer [995] requesting context for Local Plan set out including existence of policy vacuum from 2006, lack of 5YHLS for seven years highlighting the persistent failure to deliver new housing in accordance with P47 of NPPF, need a 20% buffer. Plus new migration figures suggest higher housing need.	Disagree – no need to state this here, some background given in chapter 1. Disagree – a buffer is not considered necessary because there has not been a persistent under-delivery. GL Hearn have been asked to review these comments and are confident in their work.
<b>National Policy Context</b>	Developer [1268 & 918]. Amend policy to remove reference to saved policies from Local Plan 2002 as do not cover period post 2006, and are inconsistent with the NPPF (for example treating AGLV similarly to AONB). Will provide clarity for applicants in	Disagree- SoS direction 2007 does not state that they become out of date on adoption of new plan , particularly LPP1. It does state that the saved policies should be read in context as it is likely that new national and regional policy would have considerable weight.

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	instances where para 49 and 14 of NPPF are engaged.	Saved policies will continue to be saved until the adoption of LPP2. Disagree that if policies are old, they are automatically out of date or do not comply with the NPPF.
<b>National Policy Context</b>	Surrey G&T Forum [880] Para 5.7 should refer to National Planning Policy for traveller sites in addition to NPPF.	Disagree – not appropriate to mention all thematic policy documents at this introductory section of the plan. If included one, would be an argument to include many more.
<b>Policy SP1</b>	<p><b>Summary:</b> This policy attracted several responses, mainly in relation to compliance with the NPPF. CPRE and National Trust suggested that an important footnote caveating the presumption in favour of sustainable development had been omitted, creating concerns that it will be ignored. It is proposed to instate this, which would also help to address the objection from one parish council relating to negative effects on AONB or AGLV. Another minor wording change to the policy was suggested, and has been agreed with, where an additional reference to applications ‘for sustainable development’ would be helpful for refusing applications. Other suggestions about adding in the reverse of the policy have not been accepted as policies should be positively worded, as have the suggestion of adding an additional reference to NDPs in the third paragraph as the words ‘policies relevant to the application’ would include those in made plans. <b>Elstead Parish Council</b> supported the policy and another, <b>Dunsfold Parish Council</b>, requested a definition of sustainable development (one exists in the supporting text). The CCG supported the policy and wished to remind us of the importance of primary healthcare and community health and urged further discussions on this topic.</p>	
<b>Policy SP1</b>	Several respondents, including CPRE [468] and National Trust [848], suggest that the important footnote caveating the PSD in Para 14 has been missed from this policy, creating concerns that it will be ignored when determining applications. [As NT state ‘In practice this means that, where the development plan is unsatisfactory, planning authorities in areas such as, inter alia, AONBs or Green Belt should apply the NPPF policies on AONBs or Green Belt rather than simply apply the	Disagree – policy wording is taken from a model policy issued by Government.

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	<i>sustainable development principles of the NPPF</i>	
<b>Policy SP1</b>	CPRE [468] Suggestion that second sentence includes 'for sustainable development' after 'proposals' to align with p187 of NPPF (and not go beyond the PSD to equate to presumption for development)	Disagree – policy wording is taken from a model policy issued by Government.
<b>Policy SP1</b>	CPRE [468] suggest referring to the refusal of development conflicting with this policy to second para.	Disagree – not in spirit of positive preparation to include negatives. Implicit in existing wording.
<b>Policy SP1</b>	CPRE [468] third paragraph fails to have regard to NDPs and after the word 'application' the words 'including policies in any relevant Neighbourhood Plan'.	Disagree – any made NDP would be part of the development plan and therefore 'relevant to the application'.
<b>Policy SP1</b>	Developer [1000] & [1350] wants reference to para 49 of NPPF within this policy. (1350 considers plan unsound, not legally compliant and failure to DtC).	Disagree – unnecessary as policy relates to entire NPPF.
<b>Policy SP1</b>	<b>Elstead Parish Council</b> [1192] Strongly support policy.	Noted and welcomed.
<b>Policy SP1</b>	<b>Chiddingfold Parish Council</b> [1198] objects strongly to policy as no guidelines have been defined regarding detrimental effects to AONB or AGLV.	Disagree – NPPG and case law helps define 'harm'.
<b>Policy SP1</b>	<b>Dunsfold Parish</b> [1287] - policy needs to qualify what SD is. Think plan is unsound as relies on settlement at Dunsfold Aerodrome which is not sustainable.	Disagree with proposed changes to policy, nor appropriate here, supporting text references three strands and para 5.23 justifies DA on sustainability grounds.
<b>Policy SP1</b>	<b>CCG</b> [1401] [1404] support para 5.9 and wish to emphasise need for health to be considered as part of this, plus greater emphasis on community health and need to consider pressure on primary care. CCG urges further discussion on health care	Noted. Meeting arranged for early November.

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	facilities and services.	
<b>Policy SP1</b>	Developer [1135] suggests wording of SP1 needs to more accurately reflect PSD in NPPF. The words absent or silent are omitted as is the phrase development plan. Needs to be amended to allow sites not allocated in the Local Plan or an NDP to come forward.	Disagree – wording sufficiently flexible in referring to the presumption in favour (PIF).
<b>Policy SP1</b>	Developers [1004] & [1351] support paragraph 5.10 and supports identification of Farnham as one of the highest order settlements.	Noted.
<b>Policy SP1</b>	Developer promoting SS6 [1507] supports SP1.	Noted.
<b>Policy SP1</b>	Individual [593] Disagrees with Cranleigh being a town as it does not have a train station. Suggests SP2 is re-worded.	Disagree. Cranleigh is not defined as a town; it is a 'main settlement'. Settlement hierarchy is based on wider factors than just transport links.
<b>Waverley Settlement Hierarchy</b>	<p><b>Summary:</b> Comments received against the settlement hierarchy mainly related to Cranleigh. A small number of individuals felt that Cranleigh should not be included in main settlements category as, unlike the other three towns, it does not have a rail station or similar standard of road network. Other responses on Cranleigh relating to the need for more employment land to warrant the housing increase (and avoid traffic impacts), although other respondents suggested that the ELR had overstated the employment possibilities at Cranleigh and as a response it should have fewer homes allocated to it.</p> <p>Other single comments received suggested that Wonersh and Shamley Green should be categorise as having limited services, rather than very limited services and that Alfold should be referred to as 'Alfold (including Alfold Crossways) as in the Settlement Hierarchy.</p>	
<b>Waverley Settlement Hierarchy</b>	<b>Wonersh Parish Council</b> [1133] Object to inclusion of Cranleigh in same category as other main settlements. Does not have same access to rail/ road network or employment. Issues have not been given sufficient weight and risks plan being unsound.	Disagree. Settlement hierarchy is based on wider factors than just transport links.
<b>Waverley Settlement Hierarchy</b>	Individual [686] Suggests that Wonersh & Shamley Green should together be considered as a 'rural community with limited services' rather than 'very	Settlement hierarchy is an objective piece of work, taking account of a range of factors including employment, services and environmental constraints.

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	<p>limited services' as they have better facilities than Ewhurst which is in former category. Most emphasis needs to be put on the provision of employment in Cranleigh to avoid additional traffic impact, particularly in light of Hewitts industrial estate is to be converted to housing.</p>	<p>Comment noted on employment land. To be considered by LPP2.</p>
<b>Waverley Settlement Hierarchy</b>	<p>Developer [559] &amp; [563] suggests that text in para 5.10 is amended to state 'Alfold (including Alfold Crossways)' to be consistent with the Settlement Hierarchy report.</p>	<p>Agree. Settlement hierarchy suggests that this combined settlement was proposed in response to reps from Topic Paper Consultation in Feb 2009. <i>Minor mod</i></p>
<b>Waverley Settlement Hierarchy</b>	<p>Developer [1148] considers unsound, not legally compliant, nor DtC. Cranleigh is a strategic location with good connectivity and a range of services. Market demand is strong.</p>	<p>Noted.</p>
<b>Waverley Settlement Hierarchy</b>	<p>Cranleigh Civic Society [1100] Assessment of Cranleigh in settlement hierarchy is not sound as it is based on out-of-date evidence that does not comply with national policy with regards to SD. Inflated ELR figures, specifically relating to Cranleigh Brick and Tiles site (20ha) – 4km from village and now in significant disrepair- rated as poor in the August 2016 update. Object to associated high level of development at Cranleigh.</p>	<p>Disagree. Do not agree that Cranleigh's position in the settlement hierarchy is incorrect.</p>
<b>Waverley Settlement Hierarchy</b>	<p><b>Cranleigh Parish Council</b> [1087] Policy unjustified as it is based on out of date evidence and not appropriate. Argues the settlement hierarchy does not include services or employment opportunities, nor the planning context set by the emerging Local Plan. ELR includes sites which are no longer viable areas for employment. Therefore figure higher than it</p>	<p>Disagree. Settlement hierarchy does take account of a range of factors including employment, services and environmental constraints.</p> <p>Disagree. Housing allocations are based on more than the ELR.</p>

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	<p>should be, and has been used to suggest housing figure. Should be 7ha as opposed to 32.4ha. Suggesting that growth too high to limit impact on AONB –against the objectives of the SA. Cranleigh should not be classed as a main settlement – smaller population, no train station, SA incorrect with bus routes therefore traffic impacts of new housing would be too great, and concerns re sewerage capacity. Response contains tens of comments from residents on; * lack of consultation, * how plan isn't positively prepared, justified, * effective, * consistent with national policies, legally compliant, * complied with DtC (responses mainly relate to lack of consultation with Parish Councils) * and further comments. 53 additional responses included as supporting evidence for their rep- not to be treated as separate representations.</p>	
<b>Cross Boundary Issues</b>	<p><b>Summary:</b> Both Bramley Parish Council and East Hampshire District Council supported the sections on cross boundary issues, particularly in relation to Guildford Borough for the former. A small number of developers responded to say that WBC had failed to meet the duty to co-operate particularly in relation to meeting unmet need from Guildford and Woking.</p>	
<b>Cross Boundary Issues</b>	<p><b>Bramley PC</b> [1083] –welcomes the cross border working with Guildford.</p>	Support noted.
<b>Cross Boundary Issues</b>	<p>Developer [1105] The Plan fails to meet the Duty to co- operate on the grounds that it does not reference the needs of the other two LPA within the HMA: Guildford and Woking, and whether there is an unmet need. Historically Woking has undersupply compounded by its urban area, which their Core Strategy Inspector anticipated that Guildford and</p>	Disagree – DtC requirements have been met, as per DtC topic paper.

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	Woking.	
<b>Cross Boundary Issues</b>	Developer [560] text does not set out steps undertaken to establish whether there are unmet needs arising from neighbouring authorities. Reads that WBC have not done much consultation yet.	Disagree – DtC requirements have been met, as per DtC topic paper.
<b>Cross Boundary Issues</b>	Individual [211] not yet sufficient detail to show what the combined impact is on the local area from Guildford Local Plan and Waverley Local Plan, particularly in terms of infrastructure.	Disagree – The impact of combined development from Waverley and adjoining authorities has been taken into account, e.g. in the Strategic Highways Assessment.
<b>Cross Boundary Issues</b>	<b>EHDC</b> [843] support. Further consultation with neighbouring authorities will ensure there are no significant adverse effects.	Noted and welcomed.
<b>Cross Boundary Issues</b>	Developer [1128] DtC – no strategy for any likely unmet need from neighbouring authorities (notably Woking). <u>Questions soundness and legal compliance.</u>	Disagree – DtC requirements have been met, as per DtC topic paper.
<b>Spatial Strategy for Waverley General points</b>	<p><b>Summary:</b> <i>In general concerns fell into two categories, firstly the justification for the strategy and secondly whether the strategy is the right one. In terms of justifying the strategy, a few respondents (including Hambledon parish Council, individual residents and a developer) questioned the validity of relying on a consultation in 2014 on four different housing strategies, three of which included Dunsfold as an option. One respondent also stated that the housing options voted upon at that time were for a higher number of homes at Dunsfold, thus reducing the requirement elsewhere in the Borough. The issue seems to be whether these were all the available options and how the results of that consultation have influenced the strategy in this document.</i></p> <p><i>The second issue, which received far more responses, including from several Parish Councils, questioned whether the strategy of distributing the majority of the housing development in the south east of the Borough, described as some as ‘inaccessible’ or ‘unsustainable’, and how this seemed to contradict aspirations for sustainable development and to focus development in the four towns (as specified in SP1). While some responses suggested that a spread across the Borough ignored infrastructure challenges in some areas, other responses, such as from Dunsfold Parish Council, suggested an even spread would be fair.</i></p> <p><i>Another element of questioning the strategy relates to the two-part nature of the plan and the impact on delivery</i></p>	



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	<p><i>if a significant amount of the housing is delivered through LPP2 and neighbourhood plans. This issue and the potential over-reliance on strategic sites that may take many years to come forward was raised primarily by developers and challenged the effectiveness and soundness of the plan.</i></p> <p><i>Other less frequently made comments relate to developers proposing additional sites (either strategic or non-strategic), a comment from Bramley Parish Council questioning whether the housing allocation figure of 70 can be classified as 'limited levels of development, Dockenfield Parish Council supporting the settlement boundary review to prevent settlement coalescence, and a comment about the 'washed over ' nature of Green Belt..</i></p> <p><i>There were several comments of support as well for the spatial strategy, mainly from developers who supported the settlement hierarchy.</i></p>	
<b>Overall strategy</b>	<p>POW (343] not positively prepared due to unequal distribution of housing in area where there is little support.</p> <p>Not effective – over-reliance on one strategic site (DA).</p>	<p>Disagree. Do not agree that the Spatial Strategy is unsound or unbalanced. As explained in 5.25, the Strategy does not distribute development evenly across the Borough. This is due to a range of factors, in particular the constraints that apply. Several options were tested through the SA and this found options that distribute development more evenly would perform poorly in terms of certain objectives.</p> <p>Disagree – our assessment is that the strategy is deliverable, with sufficient sites to be delivered in the early part of the plan period to ensure a five year housing land supply.</p>
<b>Overall strategy</b>	<p>Individual [1183] Unsound: not positively prepared - OAN is based on out of date data -developer led -no account of local public opinion -not a balanced sustainable solution to place 45% of housing in one remote area -plan identifies no additional land for industrial use or warehousing, except in SS7 with severe traffic</p>	<p>Disagree. Do not agree that the Spatial Strategy is unsound or unbalanced. As explained in 5.25, the Strategy does not distribute development evenly across the Borough. This is due to a range of factors, in particular the constraints that apply. Several options were tested through the SA and this found options that distribute development more evenly would perform</p>

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	implications. -does not demonstrate how infrastructure is funded and delivered.	poorly in terms of certain objectives.
<b>Overall strategy</b>	Developer [647] object to clause 1 as AONB is not a blanket ban on development. Suggest that some developments have less negative impact than development at Dunsfold.	Disagree. Do not agree that clause 1 imposes a blanket ban on development in AONB.
<b>Overall strategy</b>	<b>Hascombe Parish Council</b> [1250] and <b>Plaistow and Ifold Parish Council</b> [1001] and <b>Alfold Parish Council</b> [1269] (same clerk) <i>Challenge soundness</i> Para 5.25 Queries distribution of development across the Borough (45% in the east when evidence shows 57% of need originates in the west) and that the Sustainability Appraisal does not indicate that the Dunsfold development is the most sustainable option. Additionally, Hascombe and Alfold suggest WBC is making too many assumptions in allocating Dunsfold Park at this stage. Suggest WBC have failed to consider adverse impacts as referenced in footnote to Para 14. Allocation of DA is inconsistent with policies re SD.	Disagree. The SA concluded that the preferred option, which includes 2600 dwellings at DA is, on balance, represents sustainable development.
<b>Overall strategy</b>	<b>Dunsfold Parish Council</b> [1284] suggest that an even spread of development across the Borough would be more sound.	Disagree. Do not agree that the Spatial Strategy is unsound or unbalanced. As explained in 5.25, the Strategy does not distribute development evenly across the Borough. This is due to a range of factors, in particular the constraints that apply. Several options were tested through the SA and this found options that distribute development more evenly would perform poorly in terms of certain objectives.
<b>Overall strategy</b>	<b>Hambledon Parish Council</b> [1057] - Local Plan should require necessary infrastructure to be a pre-condition for granting of consent, especially Dunsfold	Disagree. Para 5.22 states that development of the Dunsfold site is 'subject to these matters [traffic] being resolved satisfactorily'.

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	Park and transport impacts.	Policy ICS1 also states that infrastructure considered necessary to support new development must be provided on site, off site or through financial contributions.
<b>Overall strategy</b>	<b>East Hampshire DC [844]</b> Support making best use of previously developed land and locating development with good access to service and facilities using a settlement hierarchy to focus new development. It applauds the approach to meet OAN in full bearing in mind the planning constraints in the Borough, including reviewing the Green Belt.	Support noted.
<b>Overall strategy</b>	Cranleigh Civic Society [1082] Proposal for 45% of the housing allocation in and around Cranleigh including Dunsfold, does not achieve Council's aim for development in the most sustainable locations.	Disagree. Do not agree that the Spatial Strategy is unsound or unbalanced. As explained in 5.25, the Strategy does not distribute development evenly across the Borough. This is due to a range of factors, in particular the constraints that apply. Several options were tested through the SA and this found options that distribute development more evenly would perform poorly in terms of certain objectives.
<b>Overall strategy</b>	Developer [974] believes it is non-sensical to put largest proportion of new housing in most inaccessible part of Borough. – against SD principles.	Disagree. See above.
<b>Overall strategy</b>	Developer [1294] Soundness (+vely prepared/justified/effective) - Housing delivery – plan does not adequately identify a robust supply of deliverable sites, and lacks flexibility on delivery. Some supply information not credible, not evidenced and overly optimistic. Dunsfold Park highly questionable and unrealistic. Suggest not justified as there are other sites available to provide genuine	Disagree – our assessment is that the strategy is deliverable, with sufficient sites to be delivered in the early part of the plan period to ensure a five year housing land supply.

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	<p>housing opportunities, and not effective as 36% of supply is from 'questionable sources' (Dunsfold and windfalls). Suggest reserve sites as per Sevenoaks Core Strategy.</p> <p>Windfalls should be approached with caution to avoid overreliance given low historic delivery. Suggest a cap of 50 units per year and just for later plan period.</p>	
<b>Overall strategy</b>	<p>National Trust [850] Support the focus for development in existing settlements; Godalming and Haslemere require careful protection as Green Belt surrounds.</p> <p>No consideration has been given to the landscape implications of removing areas in the Green Belt which are also parts of the AONB.</p>	<p>Support welcomed.</p> <p>Disagree. Policy RE3 refers to landscape implications on AONB and its setting.</p>
<b>Overall strategy</b>	<p>Developer (promoting SS6) [1508] Crown Golf support WBC's Spatial Strategy, in particular development at the larger villages, including Milford (a highly sustainable larger village) and the allocation of strategic sites, in particular strategic site SS6 (Land opposite Milford Golf Course).</p>	<p>Support welcomed.</p>
<b>Overall strategy</b>	<p>Individual [762] arbitrary to share the development burden across the Borough without prior consideration of infrastructure.</p>	<p>Disagree – existing infrastructure and potential for improvements is including in spatial planning decisions. See chapter 8.</p>
<b>Overall strategy</b>	<p>Individuals [31], [45] [452] &amp; [738] <u>challenges legal compliance and soundness</u>. Unsound to place 45% of housing allocation in Cranleigh area, (transport, impact on natural environment). Low turnout of 2014 consultation.</p>	<p>Disagree. Do not agree that the Spatial Strategy is unsound or unbalanced. As explained in 5.25, the Strategy does not distribute development evenly across the Borough. This is due to a range of factors, in particular the constraints that apply. Several options were tested through the SA and this found options that distribute development more evenly would perform</p>

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		poorly in terms of certain objectives.
<b>Flawed consultation</b>	Residents Assocn [990] & [994] This section makes no reference to consultation in 2014 and that 80% of respondents preferred 3400 homes at Dunsfold not 2600 (which is less than 10% preferred). WBC has ignored their own consultation.	Disagree. The results of the consultation responses were taken into account. Since 2014, further work has identified that level of growth is too high and does not fit with a balanced spatial strategy.
<b>Flawed consultation</b>	POW [343] flawed and biased consultation in 2014 is the sole justification for policy SP2. Plus Evidence cited elsewhere (SA/TA) shows that Dunsfold and Cranleigh are the least sustainable locations in transport yet 45% of all new housing development and 39% of all new employment floor space is there.	Disagree. Do not agree that the Spatial Strategy is unsound or unbalanced. As explained in 5.25, the Strategy does not distribute development evenly across the Borough. This is due to a range of factors, in particular the constraints that apply. Several options were tested through the SA and this found options that distribute development more evenly would perform poorly in terms of certain objectives. Transport is only one element of sustainability.
<b>Flawed consultation</b>	Resident's Association [158] Consultation responses from Scenario Consultation not taken into account (80% of respondents chose option with 3500 dwellings at Dunsfold).	Disagree. The results of the consultation responses were taken into account. Since 2014, further work has identified that level of growth is too high and does not fit with a balanced spatial strategy.
<b>Flawed consultation</b>	Individual [578] Flawed consultation process with 3 out of 4 consultation options including DA. <i>Unjustified</i> -Other sites are more suitable but have been turned down, e.g. around Milford.	Disagree. See above.
<b>Flawed consultation</b>	<b>Hambledon Parish Council</b> [1057] -The 2014 consultation received 3.3% response rate – can not be taken as representing the Waverley view. 3 of 4 scenarios involved high concentration of housing at Dunsfold – it is to be expected that residents elsewhere would support this.	Disagree. Do not agree that the Spatial Strategy is unsound or unbalanced. As explained in 5.25, the Strategy does not distribute development evenly across the Borough. This is due to a range of factors, in particular the constraints that apply. Several options were tested through the SA and this found options that distribute development more evenly would perform poorly in terms of certain objectives.
<b>Over-reliance on strategic</b>	Developer [1044] Support aspirations of Spatial	Disagree – our assessment is that the strategy is

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<p><b>sites</b></p>	<p>Strategy. However, over-reliance during the early stages on strategic sites indicates that non-strategic sites and work on LPP2 needs to come forward as a matter of urgency to avoid delivery issues/5YHLS issues.</p>	<p>deliverable, with sufficient sites to be delivered in the early part of the plan period to ensure a five year housing land supply.</p> <p>Do not agree that preparing a Local Plan in two parts will jeopardise delivery of plan. There are sufficient sites allocated in part one to ensure a five-year housing land supply.</p>
<p><b>Over-reliance on strategic sites</b></p>	<p>Developer [948] Broadly support the Spatial Vision, Local Plan Objectives and release of selected Greenfield sites on the edge of main settlements. Do not support overall housing number or those for Godalming – unsound. Mirror HBF’s comments about why an uplift in housing requirement is required- cross boundary considerations. WBC do not make adequate adjustment to OAN to increase overall supply to facilitate more affordable homes, particularly Godalming where too heavy over-reliance on past delivery. Unjustified delay in Local Plan by only allocated strategic sites now. Impact on yrs 1-5 delivery if LPP2 unadopted until 2020.</p>	<p>Support noted. Disagree – our assessment is that the strategy is deliverable, with sufficient sites to be delivered in the early part of the plan period to ensure a five year housing land supply.</p>
<p><b>Over-reliance on strategic sites</b></p>	<p>Developer [1135] <i>Challenging soundness</i>. Policy SP2 – Spatial Strategy places too great a reliance on large Strategic sites and as yet unknown NDPs for housing delivery. Unclear on how 5YHLS will be maintained. SP2 needs to be amended to allow sites not allocated in the Local Plan or an NDP to come forward.</p>	<p>Disagree – first paragraph allows development proposals to be considered on basis of PIF.</p>
<p><b>Over-reliance on strategic sites</b></p>	<p>Developer [1150] <i>challenging effectiveness</i>. Support spatial strategy, including focus on Cranleigh. However, Council must identify a five year supply of</p>	<p>Welcome support. Confident that our strategy is strong.</p>

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	deliverable sites.	
<b>Over-reliance on strategic sites</b>	Developer/Planning Agency [128] Should reduce emphasis on strategic sites and disperse allocations across Borough (outside of GB and AONB). Ewhurst has the potential to accommodate more, e.g. Chanrossa.	Disagree – our assessment is that the strategy is deliverable, with sufficient sites to be delivered in the early part of the plan period to ensure a five year housing land supply.
<b>Over-reliance on strategic sites</b>	POW [343] <i>Plan is unsound</i> because of dependence on single, large strategic site.	Disagree that the plan is dependent on one site. As stated in Ch18, if sites do not come forward as expected, action will be taken to address this.
<b>Two-stage process</b>	HBF [892] <i>Challenging the soundness</i> . The Plan is unsound. Part 1 only allocates strategic sites leaving the other allocations to meet the housing requirement to Part 2 and neighbourhood plans which will be too late and not help those in housing need. The Council needs to identify all the housing sites it needs to meet the housing requirement rather than just the strategic sites as a contingency against the failure of windfalls, Dunsfold and outstanding planning permissions to meet to deliver the number of dwellings estimated.	Disagree. In order to produce a plan to provide certainty and in good time, as well as give parish councils the opportunity to prepare neighbourhood plans the Council has prepared a plan which deals with strategic matters initially to provide the framework for allocations and detailed policies at a later stage.
<b>Two-stage process</b>	Developer [1106] <i>OBJECT: Unsound – Not Positively Prepared, Effective, Justified or Consistent with National Policy</i> Support that most new development will be located in and around the main settlements which includes Farnham. However, the strategy is contingent upon the detailed allocations of part 2 of the Local Plan which will cause delays and uncertainty.	Disagree – our assessment is that the strategy is deliverable, with sufficient sites to be delivered in the early part of the plan period to ensure a five year housing land supply.
<b>Two-stage process</b>	Developer [1264] expresses concern about Local	Disagree – The NPPG states that additional Local

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	Plan being developed in two parts citing issues of lack of clarity on housing land supply, and lack of full suite of policies consistent with NPPF.	Plans can be produced, where is a clear justification for doing so.
<b>Two-stage process</b>	Developer [1044] Support overall strategy but need to work on LPP2 as a matter of urgency to avoid 5YHLS.	Noted
<b>Other sites should be included</b>	Developer [1175] Land on Petworth Road, Milford (north of Rodborough School) Paras 5.16-5.17 and Policy SP2 Support approach to allow moderate levels of development in an around large villages.	Noted. SP2 does not preclude other sites from coming forward, provided they are sustainable development.
<b>Other sites should be included</b>	Developer [1337] Do not consider that all suitable and available sites have been considered for allocation as strategic site, particularly Milford and Witley, which are capable of delivering more. Plus concerns over deliverability of Dunsfold Aerodrome. The plan is an opportunity for an additional/alternative strategic housing site in Milford at land at Secretts, Hurst Farm, located at the north east edge of Milford. (200 homes) This submission identifies that there are other more suitable sites, such as the land at Secretts, Hurst Farm that can assist in meeting the housing needs of the district whilst delivering other more localised benefits in Milford. Suggest that a more flexible approach	Noted. SP2 does not preclude other sites from coming forward, provided they are sustainable development. The site at Hurst Farm has not previously been promoted for housing development through the LAA.
<b>Other sites should be included</b>	Developer [1043] support spatial strategy, particularly inclusion of land to the west of Pentworth Road in the village boundary of Witley and its removal from GB.	Noted. SP2 does not preclude other sites from coming forward, provided they are sustainable development.
<b>Extra strategic site at Alfold</b>	Developer [916] Spatial strategy at SP2 is unjustified and misapplied. For example taken a negative approach to strategic opportunity at Alfold,	Disagree with adding reference to Alfold in point 3 as undermines settlement hierarchy. Alfold's allocation has been capped at 100 homes as it has limited



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### Key stakeholders highlighted

	<p>and inconsistent with the decision to allocated Dunsfold.</p> <p>An arbitrary ceiling of 100 homes applied at Alfold. Additional bullet point at para 5.16 'the ability to deliver sustainable development'.</p> <p>Amend policy SP2 to include Alfold in point 3 and some supporting text to include reference to Alfold.</p>	<p>services. Additional bullet point not necessary as text too general. Whole strategy is underpinned by an SA.</p>
<b>Extra strategic site at Alfold</b>	<p>Developer [917] <i>Challenging soundness</i> - OAN too low. RPS report suggests 625dpa. Client has significant interests in the plan and objects to the omission of a residential allocation at Alfold.</p>	<p>Do not agree that the OAN figure of 519 homes p.a. is too low. Alfold's allocation has been capped at 100 homes as it has limited services. Allocations (non-strategic) to deliver this allocation can be considered through LPP2 or through the neighbourhood plan.</p>
<b>Comments on Weyburn Site</b>	<p>Individual [509] <i>challenges the soundness of the plan</i> and the assertion that small villages will only have infill but <i>Weyburn site</i> in Peper Harow parish is identified in the LAA. Suggest that the Weyburn site has the yield of 70 removed, and treat any homes as windfall.</p>	<p>Disagree – the inclusion of the site in the LAA does not mean that it will be allocated in either part one or part two of the plan.</p>
<b>Comments on Weyburn Site</b>	<p><b>Peper Harow Parish Council</b> [1234] dispute fact in 5.17 that there is 'no planned growth in the smaller villages....' Development of the Weyburn Works site would double the number of homes in Peperharow. Dispute that there is a defined local need in parish. Site has been listed under Elstead parish.</p>	<p>Disagree. Weyburn Works is partly in Elstead parish and partly in Peper Harow, but as it is close to Elstead's settlement boundary, it has been included as part of Elstead's allocation of 150 homes in ALH1.</p>
<b>Comments on landscape designations</b>	<p>Land agents/developers [1453] <i>Challenging soundness</i>. Para 5.19 -Area of Great Landscape Value (AGLV) is a local designation unsupported with accurate and up to date evidence base and contrary to para 158 of the NPPF. It should be deleted.</p>	<p>Disagree. AGLV is justified as a local landscape designation. Consideration of environmental value of Dunsfold Park will be tested through the application process.</p>
<b>Settlement boundary review</b>	<p><b>Dockenfield Parish</b> [1248] WBC conducting a settlement boundary review. Support this in the hope</p>	<p>Noted. Agree that Dockenfield has very limited services and as such, that only modest growth to meet local</p>

## Chapter 5 Spatial Strategy

### Key stakeholders highlighted

	of preventing Farnham/Frensham and Docketfield edges merging. Docketfield is in lowest group on sustainability index with few facilities. Yet have had high development pressure – no mechanism to force proportionality in the Local Plan.	needs should be allowed.
<b>Green belt</b>	Individual [420] disingenuous to refer to GB washing over villages as they lie within the GB. Descriptor of 'moderate growth' ignores the significant impact of growth on these villages.	Disagree. 'Washed over' is a technical term common in planning policy. Means no less than full GB. Impact on villages would be considered as part of any application.
<b>Support</b>	Developer [54] & [55] Spatial strategy supported, especially development at four main towns and Farnham which is the largest town. <i>Approach consistent with NPPF and NPPG.</i>	Welcomed.
<b>Support</b>	Developer [561] support comment in the supporting text regarding need for new peripheral green field dvlp, development at villages, and that settlement boundaries should be reviewed as part of LPP2. Wish WBC to recognise that existing settlement boundaries are out of date.	Welcome support but disagree that settlement boundaries are out of date. These will be reviewed in LPP2.
<b>Support</b>	Developer [56] In SP2 criterion 8, add '(more than 100 homes)' between 'Non-strategic sites' and 'will be identified'.	Disagree – unnecessary as strategic sites are defined in Chapters 6 and 18. In any case, this is incorrect as non-strategic sites are those that are <u>less</u> than 100 homes and not more. <i>Minor mod</i> to para 5.23 to add clarity.
<b>Support</b>	<b>Grayshott PC</b> [120] Pleased for recognition that Haslemere is constrained (more than other towns) because of GB. Pleased no proposed changes to GB. Note the four LAA sites in Hindhead and would like early notification if plans put forward – would have wanted more on how transport is going to be upgraded to deal with housing.	Support welcomed. The PC will be consulted if LAA sites come forward as planning applications. The Infrastructure Delivery Plan sets out the highway and transport schemes that are considered necessary to accommodate the planned growth.

## Chapter 5 Spatial Strategy

### Key stakeholders highlighted

<p><b>Support</b></p>	<p>Dunsfold Airport [1388] Support policy as consistent with NPPF para 17. One of core principles is to encourage Brownfield land unless of high environmental value. Site is not of high environmental value. Site is 82% PDL. Also supports SP2 in that it seeks to meet objectively assessed needs and infrastructure requirements as required by paras 14 and 47 of NPPF. Also support commitment to allocate DA as a strategic site.</p>	<p>Support noted.</p>
<p><b>Support</b></p>	<p>Developer [1236] Supportive of principles of spatial strategy including focussing development on main settlements and some growth in smaller villages.</p>	<p>Welcomed</p>
<p><b>Link between NDP and Local Plans</b></p>	<p>Farnham Society [1111] Should make clear that all major development should avoid all land designated with landscape and scenic beauty. Should state that focus of development should be at Dunsfold and four main settlements, and Brownfield land to be developed in preference to Greenfield sites. Sites included in Housing Land Supply figures are excluded from Farnham NP and therefore should not be included in Local Plan.</p>	<p>SP2 in conjunction with SP1 does this.</p> <p>Policy does seek to maximise the use of suitable Brownfield sites, including Dunsfold Aerodrome. The LAA has assessed sites independently from the Farnham NDP, although there is a strong degree of agreement between them on sites.</p>
	<p><b>Godalming Town Council</b> [1132] Support the principle in SP2 that non-strategic sites will be identified in LPP2 and NDPs. However seek clarity on how WBC is defining a strategic site – is it simply housing numbers?</p>	<p>As stated in Chapters 6 and 18, strategic sites are those that have the potential to deliver 100 or more dwellings.</p>
<p><b>Spatial Strategy for Waverley - Dunsfold</b></p>	<p><b>Summary:</b> Many comments were received from all types of respondents on the proposals for Dunsfold Aerodrome, mostly highlighting traffic and transport challenges. Parish Councils in that area (Chiddingfold and Dunsfold) also commented in this way and also questioned the development at Dunsfold, and questioned the assertion that it is a Brownfield site. Many responses, for example from Dunsfold Parish Council, questioned the</p>	

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### Key stakeholders highlighted

	<p>requirement for infrastructure and whether this would be delivered in time. Surrey County Council also expressed concerns on transport suggesting the inclusion of a clause 'the developer should demonstrate that the development can be made sustainable in transport terms' in para 5.22. However, we feel that this is an unnecessary addition given that the paragraph already states 'subject to these matters being resolved satisfactorily'.</p>	
	<p>Dunstable Airport Ltd [1386] Para 5.21- Support this paragraph but would refer to a number of other changes since 2009, including Government support for larger scale developments/garden cities. WBC submitted a bid to the Government for a garden village at the site.</p>	<p>Agree. A new bullet point will be added to para 5.21 referring to the garden cities agenda. <i>Minor mod</i></p>
<p><b>Spatial Strategy for Waverley</b></p>	<p>Land agents/developers [1453] Para 5.21 - The second bullet point notes that the NPPF supports the reuse of Brownfield land provided that it is not of high environmental value. However, Dunstable Aerodrome is of high environmental value so this should be deleted.</p>	<p>Do not agree that Dunstable Aerodrome has high environmental value.</p>
	<p><b>Chiddingfold Parish Council</b> [1204] Statement 'impacts being severe' in NPPF is undefined, a massive judgmental loophole in statement. Little evidence to show that appropriate mitigation measures have taken place or are even planned. No evidence that all of Dunstable Aerodrome is Brownfield. Dunstable development at the foreground of views from AONB, AGLV and panoramic views from all around the area. Would materially spoil the setting of these areas if housing development allowed here.</p>	<p>Disagree. The SA concluded that the preferred option, which includes 2600 dwellings at DA is, on balance, represents sustainable development.</p> <p>The Council considers that Dunstable Aerodrome is predominantly Brownfield. A minor modification will be made to Chapter 18 to ensure that impacts on the setting of the AONB are addressed.</p>
<p><b>Spatial Strategy for Waverley</b></p>	<p>Individual [164] plan unsound as fails to address sustainability issues raised in 2009. Unjustified based on flawed historic data and ineffective</p>	<p>Do not agree. Much has changed since 2009, as explained in para 5.21.</p>

## Chapter 5 Spatial Strategy

### Key stakeholders highlighted

	(unbalanced distribution). Individual [578] Unsound plan as based on incorrect housing target – should be lower (400 +/- 30). Plan should be plan-led not developer led. No signs of co-operation with neighbouring LPAs, particularly Guildford re transport. Concerns about DA – nothing changed since 2009 and need guarantees on infrastructure.	Do not agree that the plan has an incorrect housing target. The methodology for calculating this is set out in the SHMA.  The Surrey County Council Strategic Highways Assessment is a joint assessment of the impact of both Waverley and Guildford Borough Council's proposed Local Plans. There has been cooperation and meetings with Guildford Borough Council.
<b>Spatial Strategy for Waverley</b>	Individual [701] supports proposal for Dunsfold providing transport issues resolved. Para 5.23 needs to refer to sustainable transport opportunities, not just highways improvements.	Disagree. The wording says "subject to the necessary infrastructure being provided..." This will include sustainable transport opportunities. In addition, Policy SS7 states that a package of sustainable transport measures would be needed at the site to support alternatives to the private car.
	Individual [1215] Housing needs should not take place without addressing the infrastructure needs. Not convinced that there are any realistic mitigation measures that would make the proposed site at Dunsfold sustainable. Impact on Guildford would be significant. The Local Plan does not address the significant problems of Cranleigh and Alford.	Agree that development should not take place unless infrastructure needs have been appropriately addressed, including at Dunsfold Aerodrome. The impacts on Guildford have been taken into account.
<b>Spatial Strategy for Waverley</b>	Individual [91] flawed and premature to include Dunsfold Aerodrome, in the absence of establishing whether the highway issues can be properly addressed. Plan silent on infrastructure measures required.	Disagree. The SA concluded that the preferred option, which includes 2600 dwellings at DA is, on balance, represents sustainable development. Policy ICS1 also states that infrastructure considered necessary to support new development must be provided on site, off site or through financial contributions.
	<b>Dunsfold PC</b> [1281] suggest that new housing and	Do not agree that the Spatial Strategy is unsound or

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### Key stakeholders highlighted

	<p>employment opportunities should be delivered where demand already exists in the west of the Borough. DA is inconsistent with policy principles. IDP implies that infrastructure will not need to be provided until 2032, but SP2 states that it should be provided alongside development.</p>	<p>unbalanced. As explained in 5.25, the Strategy does not distribute development evenly across the Borough. This is due to a range of factors, in particular the constraints that apply. Several options were tested through the SA and this found options that distribute development more evenly would perform poorly in terms of certain objectives. The IDP is being updated with more defined timescales for implementation of the infrastructure.</p>
Spatial Strategy for Waverley	<p>Developer [1332] Dunsfold is an unsustainable location and to include it is <i>unsound, unjustified and not based on supporting evidence</i>. Additional sites are required for greater flexibility (such as their client's site Land south of Frensham Vale, Farnham).</p>	<p>Do not agree that Dunsfold Aerodrome is an unsustainable location. This is explained in para 5.23. A range of options, including at this site, have been assessed through the SA.</p>
	<p>SCC [831] Welcomes last sentence in para 5.22 recognising the importance of infrastructure investment for Dunsfold; but suggest adding 'the developer should demonstrate that the development can be made sustainable in transport terms'.</p>	<p>Disagree - Unnecessary addition. Paragraph already says 'subject to these matters being resolved satisfactorily'.</p>
Spatial Strategy for Waverley	<p>Individual [389] objects to Dunsfold on sustainability grounds (largely transport)</p>	<p>Disagree -Do not agree that the Spatial Strategy is unsound or unbalanced. As explained in 5.25, the Strategy does not distribute development evenly across the Borough. This is due to a range of factors, in particular the constraints that apply. Several options were tested through the SA and this found options that distribute development more evenly would perform poorly in terms of certain objectives. Transport is only one element of sustainability.</p>
	<p>PLOT (Farnham) LLP.[1451] <i>Challenging soundness</i>- The proposed development at Dunsfold Aerodrome is contrary to the main thrust of the spatial strategy. The site does not form an expansion</p>	<p>Not contrary to the strategy. Even if development focussed at four settlements, SP2 does not preclude other sites from coming forward, provided they are sustainable development.</p>

## Chapter 5 Spatial Strategy

### Key stakeholders highlighted

	<p>of a settlement.</p> <p>SP2 -Bullets 2 and 6 are inconsistent. Dunsfold Aerodrome does not constitute an extension to an existing settlement. 2 should be amended to refer to “at four main settlements” and 6 should not mention Dunsfold Aerodrome.</p>	
<b>Policy SP2</b>	<p><b>Summary:</b> Several comments were received on the wording of policy SP2, mainly from Farnham Town Council, developers and the CCG. The CCG supported the policy along the lines of comments made SP1 in relation to the provision of healthcare in the Borough. Three responses (including from Farnham Town Council) related to the wording in the first point and modifications have been made to better reflect the wording of the NPPF. Another questioned why Dunsfold Aerodrome was not listed as a location for development focus (i.e. under point 2), and a third relates to inconsistency with policies in the rural environment chapter.</p>	
<b>Policy SP2</b>	<p>Developers [1304] <u>SP2 is not sound-unjustified and inconsistent with national policy.</u> Criterion 1 should be reworded to replace word ‘amenity’ with ‘landscape’. Words ‘such as’ suggest all landscapes will be protected not just AONB. Amend to reflect NPPF para 154.</p> <p>List Dunsfold Aerodrome within main settlements rather than under criterion 6 (echoed by Farnham TC [512]). Dunsfold Aerodrome should be included in the settlement hierarchy in para 5.10.</p>	<p>Disagree changes are necessary. It is premature to include DA in list of settlements.</p>
<b>Policy SP2</b>	<p>Farnham TC [512] agrees that amenity should be changed to landscape and scenic beauty in order to be consistent with NPPF (para 115), and should also refer to local landscape value.</p>	<p><u>Minor mods</u> suggested to take in landscape value.</p>
<b>Policy SP2</b>	<p>POW [357] No mention of AGLV nor CBGB nor cross-reference to Policy RE1 – major inconsistency as some of SS7 is in CBGB.</p>	<p>Disagree . It is not considered appropriate to mention local landscape designations in SP2.</p>

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Policy SP2	Farnham TC [512] should refer to TBH.	Disagree that policy needs to refer to TBH SPA, but there is a cross ref at 5.19 to where SPAs are addressed.
Policy SP2	CPRE [545] SP1.1 Remove the word 'major'; any development could impact land of high amenity/landscape value. SP2.6 implies Dunsfold is suitable brown field site – not all site is PDL and transport is a major issue. Suggest we state the negative case in SP2.8 'new infrastructure needed cannot be provided alongside new development'.	Disagree. Small scale development is allowed in the AONB – see NPPF. Impacts to AONB and Green Belt are dealt with in RE3.  Disagree. The Council considers that Dunsfold Aerodrome is predominantly brown field. The need to provide new infrastructure for the site is presented elsewhere and does not need to be repeated in SP2.
Policy SP2	Housing Association [960]—support policy SP2 include site allocation of SS1 (Coxbridge Farm).	Noted
Policy SP2	Elstead Parish Council (and NP Steering group) [1193] - Object to the omission from the last part of the sentence of point 3. Should read “whilst recognising that due to Green Belt and other constraints, Bramley and Elstead have more limited scope for development”.	Disagree. There is more scope in Elstead due to the GB Review. Suggested <i>minor modification</i> to explain why Bramley is different.
Policy SP2	Planning Con [9] Support allocation of housing sites in Farnham.	Welcomed.
Policy SP2	CCG [1404] Support policy, esp point 8 reference to infrastructure.	Welcomed
Policy SP2	Cranleigh Parish Council [1074] reference the Landscape Character Review which suggests high landscape importance have no protection in the Local Plan. They suggested policy SP2 is re-worded.	Disagree. Local Landscape value does not need to be referred to in the overall strategy policy. Paras 13.40 & 13.41 include text on local landscape value.



## Chapter 6 Amount and Location of Housing

### Key stakeholders highlighted

Section/ paragraph no./Policy	Key Issues Raised	Council Response
<b>Introduction</b>	<p><b>Summary:</b> A small number of general comments in relation to this chapter were received on this part of the Plan. One was a general concern from an individual questioning the justification for the scale of development and citing an apparent lack of consultation with residents (perhaps more relevant for Chapter 1: Plan Preparation section). <b>Enterprise M3</b>, the LEP, was supportive of the Plan and considers it to be legally compliant. A developer felt that the timeline of the Plan should be extended to 2033 in line with the SHMA.</p>	
	<p>Individual [396] <b>Unsound</b> No justification for that scale of housing (traffic, flooding and sewerage); consultation with residents (councillors refused to attend a recent residents meeting with Cranleigh Parish Council).</p>	<p>Disagree that the scale of development set out in the Plan is unjustified.</p>
	<p><b>Enterprise M3 LEP</b> [864] Considers the Plan legally compliant.</p>	<p>Support welcomed.</p>
	<p>Developer [564] LPP1 should be extended to 2033 (15 years from adoption and in line with SHMA).</p>	<p>Do not agree that Plan period needs to be changed to 2033.</p>
<b>Number of new homes</b>	<p><b>Summary:</b> A number of comments were received on this section and have been grouped into the following categories:</p> <ol style="list-style-type: none"> <li>1. A mixture of individuals, developers and Parish Councils (<b>Plaistow and Ifold, Bramley, Busbridge, Chiddingfold, Hambledon, Hascombe, Alfold and Dunsfold</b>) questioned whether the SHMA was based on correct and most accurate figures. A report reviewing the SHMA based on 2016 population projections was undertaken and appended to many of the responses. This report suggests that the OAN should be 400 +/-30.</li> <li>2. Another group of responses, largely from developers or land agents promoting sites not allocated in the Plan, alongside <b>Guildford Borough Council</b>, questioned whether the figure of 519dpa was too low particularly due to previous history of slow delivery rates. The suggestion of adding in a buffer (of between 10-20%) was raised by several respondents in order to add in flexibility in terms of delivery.</li> <li>3. A few comments were received, including from <b>Compton Parish Council</b>, questioning whether we should have chosen a lower OAN because of significant constraints such as Green Belt, AONB and Internationally Designated sites (referenced in para 14 of the NPPF).</li> <li>4. Royal Mail wrote in with concerns on the scale of development and implications for their business operations, which they suggest are currently at capacity.</li> </ol>	

## Chapter 6 Amount and Location of Housing

### Key stakeholders highlighted

	<p>5. <i>There were a small number of comments, all from developers questioning whether the strategy as set out in Table 6.1 was too heavily reliant on windfalls and a small number of strategic sites, particularly Dunsfold.</i></p> <p>6. <i>A few developers questioned the evidence in the plan relating to the Duty to Co-operate and suggested that more discussions should have taken place before the publication of the Plan. A mixture of support and interest in holding future discussions with us was received from a range of neighbouring LPAs (Horsham, Spelthorne, Woking and Tandridge)</i></p>	
Is the SHMA based on correct figures?	<p>Individuals [762] &amp; [223] <u>Unsound</u> Is no. of homes justified in view of Brexit? Echoed by Surrey Wildlife Trust [942] and <u>Surrey Nature Partnership</u> [1022]</p>	<p>Consultants GL Hearn, who produced the SHMA consider that the approach in the West Surrey SHMA 2015 is one that reflects the NPPF and NPPG and remains a sound basis for planning.</p>
	<p>Individual [595] and <u>Loxwood</u> [828] <u>Hascombe</u> [1251] and <u>Alfold</u> [1271] <u>Parish Council</u> <u>Unsound</u> No. of homes should be 400 +/- 30 per year. NMSS report.</p>	<p>Consultants GL Hearn, who produced the SHMA, consider that the approach in the West Surrey SHMA is one that reflects the NPPF and NPPG and remains a sound basis for planning.</p>
	<p>Individual [390] &amp; [392] &amp; [580] &amp; [594] &amp; [726] &amp; <u>Bramley Village Society</u> [1003] no. of new houses is not correct as it is an estimate based on out of date info. Refer to NMSS report.</p>	<p>Consultants GL Hearn, who produced the SHMA, consider that the approach in the West Surrey SHMA is one that reflects the NPPF and NPPG and remains a sound basis for planning.</p>
	<p><u>Plaistow and Iford Parish Council</u> [1006] &amp; [1009] <u>Unsound</u>. Housing target is out of date and should be recalculated, should remove backlog in housing supply for 2013-2017. Consider that the OAN cannot be fully delivered in a sustainable manner. Refers to NMSS report.</p>	<p>Consultants GL Hearn, who produced the SHMA, consider that the approach in the West Surrey SHMA is one that reflects the NPPF and NPPG and remains a sound basis for planning.</p>
	<p><u>Hascombe Parish Council</u> [1251] <u>Alfold Parish Council</u> [1271] &amp; <u>Dunsfold Parish Council</u> [1284] &amp; <u>Hambledon Parish Council</u> [1059] &amp; <u>Bramley Parish Council</u> [1062] &amp; <u>Chiddingfold Parish Council</u> [1208] and <u>Busbridge Parish Council</u> [989] &amp; Individual [1185] Submit NMSS report which suggests numbers are reduced to 400dpa. Ask that we update</p>	<p>Consultants GL Hearn, who produced the SHMA, consider that the approach in the West Surrey SHMA is one that reflects the NPPF and NPPG and remains a sound basis for planning.</p>

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### Key stakeholders highlighted

	the SHMA and recalculate OAN.	
	Developer [1308] refers to NMSS report and suggests a lower figure.	Consultants GL Hearn, who produced the SHMA, consider that the approach in the West Surrey SHMA is one that reflects the NPPF and NPPG and remains a sound basis for planning.
	Developer [1446] Plan relies on out of date, superseded evidence on housing land supply, due to publication of July statement. There are also inconsistent housing Trajectories (based on whether we have 5YHLS or not) – argue that Plan is out of date and concerned about availability of evidence during consultation. Fundamental flaw in the consultation process – <i>not legally compliant</i> . Individual [267] Housing need calculations quite likely to be wrong, thus giving excessive growth.	Do not agree that the Plan relies on out of date evidence. The Local Plan has a base date of 1 April 2016. The Five Year Land Supply statement published in July was to inform planning decisions, in line with NPPF para 49.
	Developer [1103] & Individual [1239] SHMA currently untested.	Disagree. Consultants GL Hearn, who produced the SHMA, consider that the approach in the West Surrey SHMA is one that reflects the NPPF and NPPG and remains a sound basis for planning.
	Protect Our Waverley [358] Essential to revise the approach to SHMA and OAN.	Consultants GL Hearn, who produced the SHMA, consider that the approach in the West Surrey SHMA is one that reflects the NPPF and NPPG and remains a sound basis for planning.
	HBF [896] <i>Unsound</i> . The Local Plan is unsound because it only covers the period up to 2032. It does not cover the period assessed in the SHMA 2013 to 2033 and does not accord with the Plan period used in Guildford's LP. The SHMA is unsound because · It does not adopt the London migration scenario which would have a starting point · It should have a higher uplift of 10% to deal with the significant affordability pressures rather than the 5% the SHMA uses · It has	Do not agree that Plan period needs to be changed to 2033. If the Local Plan is adopted in 2017 as expected, there will be a 15 year time horizon until 2032. There is no requirement for the Local Period to be the same as the SHMA period. The SHMA period only extends to 2033 because it has to cover the local Plan periods of all the LPA that make up the West Surrey housing market area. The housing figures are based on an average per annum

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### Key stakeholders highlighted

	<p>not adjusted its OAN to facilitate the supply of affordable housing. The proposed Policy of 30% AHN1 will not address affordable housing needs. A compound uplift of 20% should be used. The Full OAN should be 606dpa.</p>	<p>Consultants GL Hearn, who produced the SHMA, consider that the approach in the West Surrey SHMA is one that reflects the NPPF and NPPG and remains a sound basis for planning.</p> <p>The SHMA has tested London migration which has increased the number of new homes needed per year by 12. However it is not certain that it will occur. The demographics will have picked up the fact that London Borough's are placing homeless applicants within the Private Rental Sector in Waverley.</p> <p>There is no consistent approach or agreement (from Inspectors) to the amount of uplift that should be applied to take into account of market signals.</p> <p>Despite evidence of affordable housing need, there is no need to have a separate affordable housing uplift in addition to a market signals uplift as affordable housing delivery will be increased through increased contributions from the uplift to housing as a result of market signals uplift.</p> <p>The SHMA does not consider that there should be an uplift based on a multiple of the identified affordable housing need as set out in the SHMA. It would also lead to an entirely unreasonable and undeliverable level of housing need. There is not a simple link between overall housing need and affordable housing need as set out in the SHMA. Many households in need also occupy homes and therefore would release homes if they were moved into affordable housing.</p>
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### Key stakeholders highlighted

		OAN does not need an uplift to ensure that affordable housing delivery is increased. The PPG says this should be uplift to the housing <u>requirement</u> itself.
Figures too low/needs flexibility (Table 6.1)	Developers [565] & [1045] & [1402] table 6.1 highlights precarious nature of housing land supply – requires 100% delivery and even then will only deliver 9861 cf. council’s intention to deliver <b>at least</b> 9861.	Disagree. There are more LAA sites than needed to deliver the objectively assessed need. The windfall assumptions are likely to be an underestimate. More detail on flexibility and contingency is given in Chapter 19.
	Developer [58]& [920] & [1134] &[1263] & [1402] Objection – <u>unsound</u> . Assumes items C, F, G and H will all be delivered 100%. Naïve assumption. Should introduce a 10% non-implementation allowance (n=713).	Disagree – our assessment is that the strategy is deliverable, with sufficient sites to be delivered in the early part of the Plan period to ensure a five year housing land supply. Very few planning permissions remain unimplemented in Waverley.
	Developers [959] &[1108]& [1242] &[1257] & [1266] & [1331] & [1336] & [1312] & [1403] Figure should be higher. SHMA gives a misleading assessment of historic undersupply. Given this persistent under delivery, there should be 20% buffer. Sedgfield method should be used. An uplift to the housing target is needed for affordability. SA tested 10,700 dwellings (option 6) and this performed cumulatively as well as option 4. Local Plan should provide between 9540-11,025 dwellings for remainder of the Plan period, which equates to 635-735 dwellings pa. This could be provided without significant disbenefits. It is not clear whether had a higher housing need figure (than 519 dpa) been explored, whether this could have been accommodated elsewhere in the HMA.	Disagree. Consultants GL Hearn, who produced the SHMA, consider that the approach in the West Surrey SHMA is one that reflects the NPPF and NPPG and remains a sound basis for planning.  The SHMA is an objective assessment of housing need. Mechanisms to boost the supply of housing in the NPPF relate to the housing requirement not to the OAN. The use of the Sedgfield method applies to demonstrating that the Council has five years worth of housing supply to meet the housing requirement in accordance with the NPPF.  The OAN already includes an uplift to reflect affordability issues.

## Chapter 6 Amount and Location of Housing

### Key stakeholders highlighted

		<p>The Sustainability Appraisal concluded that option 6 performed poorly in terms of a range of objectives.</p>
	<p>Developers [1154] &amp; [1403] 519dpa does not provide for an OAN, nor is it clear that a higher housing need figure had been explored. 20% buffer should be applied. NPPG states that unmet supply should be allocated across the first five years of the Plan period, together with applying an uplift of 17% (based on average of affordable delivery), it is asserted that WBC should be seeking to deliver in the region of <b>9,540 and 11,025 dwellings</b> over the remainder of the Plan period.</p>	<p>Consultants GL Hearn, who produced the SHMA, consider that the approach in the West Surrey SHMA is one that reflects the NPPF and NPPG and remains a sound basis for planning.</p> <p>The SHMA is an objective assessment of housing need. Mechanisms to boost the supply of housing in the NPPF relate to the housing requirement not to the OAN. The use of a buffer and the Sedgefield method applies to demonstrating that the Council has five years worth of housing supply to meet the housing requirement in accordance with the NPPF.</p> <p>The SHMA does not consider that there should be an uplift based on a multiple of the identified affordable housing need as set out in the SHMA. It would also lead to an entirely unreasonable and undeliverable level of housing need. There is not a simple link between overall housing need and affordable housing need as set out in the SHMA. Many households in need also occupy homes and therefore would release homes if they were moved into affordable housing.</p> <p>Do not agree that a 20% buffer is required.</p>
	<p>CPRE [1423] Table 6.1 overstates windfall rate for Godalming, not all planning permission will be implemented, Plan is over-reliant on Dunsfold. Needs greater flexibility in light of Runnymede Local Plan. Strategic sites can assist in providing certainty of delivery.</p>	<p>Do not agree. Based on the evidence of delivery from windfall sites in the past, the windfall rates in the Local Plan are likely to be under estimations. More detail on windfall assumptions is given in the LAA. Do not agree Plan is over reliant on Dunsfold Aerodrome. More detail on flexibility and contingency is given in Chapter</p>

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		19.
	Developer [1454] & [1472] There has been a persistent under delivery over last 7 years. Windfall allowance is not realistic. Many LAA sites and some of the strategic sites won't come forward as they have unresolved constraints. There is a serious risk that housing target will not be achieved, compounded by decision not to include any contingency. Local Plan should include a contingency to provide flexibility, including additional strategic sites such as land at Waverley Lane.	Do not agree. Based on the evidence of delivery from windfall sites in the past, the windfall rates in the Local Plan are likely to be under estimations. More detail on windfall assumptions is given in the LAA. Do not agree that strategic sites will not come forward, but if this does happen other suitably location, less constrained sites would be brought forward. More detail on flexibility and contingency is given in Chapter 19.
	Developer [1456] The SHMA's economic growth adjustments do not test an Experian employment growth scenario. A higher market signals uplift in the order of 10-13% (instead of 5%) would be reasonable, giving an OAN figure of 540-550 dpa.(Regeneris report)	Disagree. Consultants GL Hearn, who produced the SHMA, consider that the approach in the West Surrey SHMA is one that reflects the NPPF and NPPG and remains a sound basis for planning.  The SHMA uses past trends (projections) and future scenarios (forecasts) from the ELR. This is in line with the PPG. The SHMA consider that the economic growth forecast aligned with the Council's agreed Economic Strategy is the most appropriate scenario to use.
	Developers [930] & [1173] & [1266] The Plan does not provide for a five year supply of housing. The Council has under delivered and should provide a 20% buffer.	Do not agree. The buffer consists of sites moved forward from later in the Plan period (NPPF, para 47). It is therefore not necessary to add this buffer in the housing trajectory for the Local Plan. A non implementation allowance is not considered to be necessary as very few permissions in Waverley lapse.
	Individual [7] <u>Challenging soundness</u> . Housing crisis not being acknowledged. Affordability a key issue. Smaller villages, such as Frensham and Churt,	Do not agree. Affordability has been taken into account in deriving the housing target for the Plan. Many smaller villages, such as Frensham and Churt have

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	<p>should have greater allocation. Farnham has infrastructure issues not being addressed by WBC.</p> <p><b>Guildford Borough Council</b> [810] We would encourage Waverley to consider additional sites that could be allocated in the Waverley draft Local Plan Part 1 to assist with providing flexibility and the ability of the Plan to adapt to unforeseen rapid change. Encourage exploration of historical windfall trends are likely to continue in future.</p>	<p>limited services and are in the Green Belt and AONB.</p> <p>Do not agree. There are more LAA sites than needed to deliver the objectively assessed need. The windfall assumptions are likely to be an underestimate. More detail on flexibility and contingency is given in Chapter 19.</p>
<p><b>Growth levels too high (also consider all NMSS responses in this)</b></p>	<p>Individual [117] &amp; [771] &amp; [786] Unsound as the Plan will result in overstretched road network, 200 HGV movements, air pollution, health issues, capacity for doctors surgeries etc etc.</p>	<p>Do not agree. There is no evidence that the planned level of growth cannot be accommodated on the highway network. The transport assessments prepared for the Local Plan suggest that suitable mitigation can be achieved, with details of the main transport schemes set out in the Infrastructure Delivery Plan.</p>
	<p>National Trust [849] Unjustified level of housing. No consideration of footnote 9 in Para 14.</p>	<p>Do not agree that the level of housing in the Plan is unjustified. Constraints such as those shown in footnote 9 in the NPPF have been taken into account in developing the strategy.</p>
	<p>Royal Mail Group [103] The delivery of 9,861 new homes across the Borough, including a new settlement at Dunsfold Aerodrome for up to 2,600 new homes, is likely to have major capacity implications for existing delivery offices. As a result, Royal Mail is likely to seek the expansion of its existing assets or require the allocation of sites for additional delivery offices, particularly where housing developments will be concentrated and where existing delivery offices are nearing capacity. The existing Delivery Offices are constrained in terms of size and might not be able to accommodate the aforementioned increase in housing provision</p>	<p>Noted. The Council is working closely with service and infrastructure providers to provide for their needs.</p>



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	without either expansion or the development of an additional delivery office.	
	Individual [135] & [763] Numbers too high, infrastructure deficient, particularly transport.	Do not agree. The justification for the housing numbers and distribution is explained in the Plan. Infrastructure will have to be provided to support new development where necessary.
<b>How we have used SHMA</b>	<b>Compton Parish Council</b> [804] <i>Unsound</i> . In an attempt to fully meet the OAN. Waverley has provided for too much housing growth in the Plan. · Treated the OAN as overriding the other provisions of the NPPF. Constraints should be applied.	Do not agree that the level of housing in the Plan is unjustified. The constraints have been taken into account.
	Individual [503] OAN figure is too high – NPPF constraints should have been used to reduce or qualify the figure. Quotes NMSS report.	Do not agree that the level of housing in the Plan is unjustified. The constraints have been taken into account.
	<b>Farnham Town Council</b> [513] SHMA figure needs to be tempered with consequences of South East Plan Policy NRM6.	Do not agree that the level of housing in the Plan is unjustified. The constraints have been taken into account, including the Thames Basin Heaths SPA. More details on this are given in Chapter 16 and the SANG Topic Paper.
	Individual [223] Have councillors or officials questioned methodology in HMA?	Consultants GL Hearn used an established methodology to produce the SHMA.
<b>Deliverability of strategy</b>	Developer [1402] <i>Plan not positively prepared, justified or effective</i> as cannot be certain about delivery rates for Dunsfold Aerodrome.	Do not agree that delivery rates for Dunsfold set out in the trajectory are inaccurate.
	Developer [1402] <i>Plan not positively prepared, justified or effective</i> – cannot defend windfall assumptions, particularly from 2019 onwards. Where is the compelling evidence needed until NPPF para 48?	Do not agree. Based on the evidence of delivery from windfall sites in the past, the windfall rates in the Local Plan are likely to be under estimations. More detail on windfall assumptions is given in the LAA.
	Developer [1403] Heavy reliance on commitments and windfalls, plus LPP2 and NDP allocations – is this realistic in terms of delivery?	Do not agree. Based on the evidence of delivery from windfall sites in the past, the windfall rates in the Local Plan are likely to be under estimations. More detail on windfall assumptions is given in the LAA.

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<b>DtC</b>	Developer [1446] & [1448] Waverley will need to test properly whether it can accommodate unmet needs of the HMA. Borough is relatively unconstrained and is better placed to accommodate unmet needs than Guildford or Woking. Limited evidence on effective cooperation under duty to cooperate. More discussions should have taken place.	Disagree – DtC requirements have been met, as per DtC topic paper. The SA has tested a range of options, including higher growth options that would meet some of Woking’s unmet needs but it concluded that these cannot be accommodated in a sustainable way.
	Individual [738] Suggests that WBC have unmet need that should be met by adjoining LPAs.	Disagree – our strategy shows that we can meet our need sustainably, despite the constraints that exist.
	Developer [564] & [919] & [929] Supports intention to Plan for 9,861 dwellings but no account of unmet needs of neighbouring authorities.	Disagree – DtC requirements have been met, as per DtC topic paper. The SA has tested a range of options, including higher growth options that would meet some of Woking’s unmet needs but it concluded that these cannot be accommodated in a sustainable way.
	Developer [1103] Waverley could positively Plan for more homes, including unmet need.	Disagree. The SA has tested a range of options, including higher growth options that would meet some of Woking’s unmet needs but it concluded that these cannot be accommodated in a sustainable way.
	Developers [1266] No strategy to address unmet need.	Disagree – DtC requirements have been met, as per DtC topic paper. The SA has tested a range of options, including higher growth options that would meet some of Woking’s unmet needs but it concluded that these cannot be accommodated in a sustainable way.
	<b>Horsham DC</b> [799] The Horsham District Planning Framework is providing 50 new homes per annum to meet the needs of other authorities through the duty to cooperate (in addition to the 100 per annum for Crawley). It is noted that the Waverley Local Plan will not require any of this 50 dwelling provision.	Noted.
	<b>Spelthorne BC</b> [808] Content with DtC despite few meeting requests since 2014 –limited issues. But notes that unmet need from Guildford/Woking might	Noted. The SA has tested a range of options, including higher growth options that would meet some of Woking’s unmet needs but it concluded that these

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	<p>be an issue.</p> <p><b>Woking Borough Council</b> [812] The three West Surrey HMA LPA need to find ways of how the overall unmet need in the HMA can be addressed, discussions which have already started. The Councils should monitor housing delivery against their housing requirements to see whether any measures will be necessary to facilitate housing delivery.</p> <p><b>Tandridge District Council</b> [291] would be keen to know if we could accommodate any of their unmet need.</p>	<p>cannot be accommodated in a sustainable way.</p> <p>Noted. The three authorities (Waverley, Woking and Guildford) are working closely and are working to produce a statement of common ground on this issue. Waverley is able to meet its own needs but the SA has concluded that Woking's unmet needs cannot be accommodated in a sustainable way.</p> <p>Noted but Tandridge is some distance from Waverley, well outside of the Housing Market Area. Moreover, Waverley is not able to meet other authorities' needs sustainably.</p>
Employment land	<p>Individual [597] PD rights from employment to resi could result in significant loss of employment land. Conflicts with our intention to protect employment land – how can we do this?</p>	<p>The ELR demonstrates that there is a need to protect existing employment sites as part of the flexible approach to meet the needs of the economy and of businesses over the Plan period. As employment uses can be lost under permitted development there is stronger justification to protect employment uses where the legislation allows the Council to control development. The Local Plan does not over ride legislation and therefore there is no need to make this point explicit.</p>
<b>Location of new housing &amp; Policy ALH1</b>	<p><b>Summary:</b> <i>A large number of responses to this section (and subsequent Policy ALH1) related to specific allocations to settlements in the Borough, particularly Cranleigh and Dunsfold (approximately 150 responses). Regarding Cranleigh, the concerns raised, mostly by individuals, related to transport impacts, and infrastructure requirements relating to water quality and sewerage. On this latter point, there was a split between those saving that deficiencies in existing infrastructure meant that the scale of development could not be accommodated, and those suggesting that infrastructure improvements necessary to facilitate development need to be in place before the development is permitted.</i></p> <p><i>Concerns relating to Dunsfold Aerodrome included comments from <b>Hascombe and Busbridge</b> Parish Councils, centred on the unsustainable location of the development, the impacts on traffic and the inconsistency with the</i></p>	

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*spatial strategy favouring sustainable locations for development. Comments were also raised, echoing those in Chapter 5, relating to bias in the four housing options presented in 2014, where three of the four options included development at Dunsfold Aerodrome.*

*The **Surrey Hills AONB Board** object to the level of development in and around the AONB, suggesting that the level of growth conflicts with our own policies on protection of the AONB. Particular areas of concerns are Elstead, Milford and Dunsfold Aerodrome where they advise the level of traffic would spoil the tranquillity of the AONB.*

*There was a sense from developers that Haslemere and Ewhurst could both accommodate more growth, with **Ewhurst Parish Council** sharing their commitment to the scale of development allocated to them. Several responses were received in relation to Witley (including Milford) with developers suggesting a high level of allocation to this large village. This view was echoed by **Alfold, Plaistow and Ifold and Hascombe Parish Councils** who felt that an increased allocation here would remove the 'burden' of development in the east of the Borough. However, **Witley Parish Council** disagreed citing infrastructure issues and the need to limit development to infill or brownfield sites.*

***Chiddingfold Parish Council** disagrees with the proposal to become inset into the Green Belt, suggesting that there is no space within the settlement boundary for development.*

*A small number of comments were received in relation to the Weyburn site being in Peper Harow and not Elstead. The general feeling from these comments was that Elstead is an unsustainable location and the allocation of 150 homes is too high, and that Weyburn site should remain an employment site.*

***Godalming Town Council** commented positively about the number of homes allocated to that town. Farnham Town Council similarly support the level of growth for their town, stating that it is in line with aspirations in the neighbourhood plan. **Rushmoor Borough Council** also responded positively about the scale of growth for Farnham and the continued protection of the Farnham-Aldershot strategic gap. Enterprise M3 are also positive about the location of housing including development at Cranleigh and Farnham alongside Green Belt releases, stating that ' the 'front-loading' of anticipated delivery is positive and proactive'.*

*On a more procedural note, some individuals raised points, echoed by **Farnham Town Council** and **Cranleigh***

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	<i>Parish Council</i> , about the role of the LAA in determining, or pre-judging, the work of the Neighbourhood Planning Groups. There was some confusion about the LAA with individuals mistaking sites in this list as being those to be allocated in their settlements.	
Role of LAA/ pre-judging LPP2 and NDPs.	Individual [440] <i>challenges legal compliance and soundness</i> . Plan relies on recently published LAA – not been consulted on, and a number of factual errors. Suggests that sites have been proposed by developers and then SA'd, therefore a developer-led Plan. LAA proposes sites that pre-judge NDPs – process not explained. They are promoting site in <i>Alfold, Chapel Fields</i> which has now been excluded from the LAA.	Disagree. LAA is not the allocation of sites. SA has focused on the spatial strategy as well as some assessment of LAA sites.
	Individuals [20] member of NP steering group in Ewhurst. Objects to site 400 in the LAA –many other sites are more suitable. Echoed by individual [21& 24&26] and individual [29]	Disagree. See above.
	Individual [70] Disagrees with listing of site Avenue, Rowledge and cites reasons.	Disagree. See above. Possibly site [176]
	Individual [797] Probably illegal to state that strategic sites are 100 plus and therefore NDPs can only allocated sites of fewer than 100.	Disagree. It is not possible to prevent strategic sites coming forward through NDPs, although allocation will need to be in line with LPP1.
	<i>Farnham Town Council</i> [515] & <i>Cranleigh Parish Council</i> [1068] Inclusion of sites in LAA seems to pre-determine either LPP2 or determining a planning application or appeal. Latter is relevant where there is a dispute over the 5YHLS. Table 6.1 Row H is made up of sites that do not comply with NPPF and/or the FNP. Include details of sites that they wish to have removed from LAA.	Disagree: LAA is not the allocation of sites. NDP have a role in the allocation of sites.
Additional sites need to be included in LAA/LPP2	Developers [315] Wish full extent of site (land north of Wyphurst Road, Cranleigh SHLAA ref 394) to be	Noted. This information will be taken into account for the next version of the LAA and for Local Plan Part 2.

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	assessed in LAA.	
	Developer [932] concerned that there are not enough sites put forward in this Plan for Godalming. Proposing a site at Scizdons Climb (40 dwellings)	Noted. This information will be taken into account for the next version of the LAA and for Local Plan Part 2.
	Developer/promoter [944] Promoting site at Lands around Witley Station.	Noted. This information will be taken into account for the next version of the LAA and for Local Plan Part 2.
	Education institution [1479] Proposing three sites in Witley in school's ownership that have no residential function.	Noted. This information will be taken into account for the next version of the LAA and for Local Plan Part 2.
	Developer [1263] & [1276] Promoting Land South of Chiddingfold Surgery & Land South of Haslemere Road, Witley.	Noted. This information will be taken into account for the next version of the LAA and for Local Plan Part 2.
	Developer [983] Suggest a list of small sites to be added to the HLS (all bar one included in LAA).	Noted. This information will be taken into account for the next version of the LAA and for Local Plan Part 2.
	Developer [1318] Land at Firethorn Farm and 44-45 Larkfield Ewhurst.	Noted. This information will be taken into account for the next version of the LAA and for Local Plan Part 2.
	Developer [1331] Land south of Frensham Vale.	Noted. This information will be taken into account for the next version of the LAA and for Local Plan Part 2.
	Surrey Wildlife Trust [942] and <b>Surrey Nature Partnership [1022]</b> lists details of sites where they are adjacent to a BOA or SNCI.	Noted. This information will be taken into account for the next version of the LAA and for Local Plan Part 2.
Consultation (lack of)	<b>Cranleigh Parish Council [1068]</b> WBC has decided to proceed straight to a Regulation 19 Local Plan with no direct consultation with Cranleigh Parish Council or the residents of Cranleigh regarding the sites proposed in the Local Plan.	Disagree. The results of the consultation responses were taken into account. There is no legal requirement to do another Reg 18 consultation before proceeding to Reg 19.
<b>Policy ALH1/Specific settlement allocations</b>	Individual [452] Housing – figure for Dunsfold should be 3500 as per 2014 scenario consultation. Other areas reduced accordingly.	Disagree. Our evidence shows that it would be difficult to deliver this level of growth (3400 at Dunsfold) during the Plan period and it does not fit with a balanced spatial strategy.
	<b>Godalming Town Council [1136]</b> Notes 1,240 new homes and raises no objection.	Support welcomed

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	Developer [69] <i>Unsound</i> . More housing should be built in the 4 larger villages of Chiddingfold, Milford, Elstead and Witley. Now that these villages are proposed to be removed from the Green Belt suitable sites will become available. The Green Belt boundary should be extended in Local Plan Part 1 in accordance with the AMEC report. In Chiddingfold the strategic gap between the built up areas should be developed.	GB is being removed to allow more development in line with the numbers proposed in ALH1.
	Developer [568] should refer to Alfold (including Alfold Crossways)	Disagree: Policy refers to Parishes so the allocation is to the settlements within the parishes, and not only the named settlement.
	<b>Rushmoor Borough Council</b> [130] No specific concerns on strategic sites except possibly delivery of DA. Pleased Farnham- Aldershot Strategic Gap maintained.	Noted.
	<b>Surrey Hills AONB Board</b> [656] Objection – growth too high –conflicts with internal policies on AONB, particularly at Elstead, Milford and Dunsfold (traffic would spoil tranquillity).	Disagree. Do not agree that the Spatial Strategy is unsound or unbalanced. As explained in 5.25, the Strategy does not distribute development evenly across the Borough. This is due to a range of factors, in particular the constraints that apply. Several options were tested through the SA and this found options that distribute development more evenly would perform poorly in terms of certain objectives.
Support	Developer [61] & [566] Plan accepts the limited opportunities to expand Godalming and Haslemere because of GB and AONB.	Noted
	Developer [62] ALH1 is supported because of the wording ‘at least’	Noted
	Developers [63]&[568]& [1010] <i>Unsound</i> . Allocation to main settlements should be expressed as a minimum in the same way as overall figure is	Disagree. It is implicit in the Policy that these allocations are minima.

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	expressed as 'at least'. Recognition of windfall being delivered in both larger and smaller villages therefore figures are a minimum.	
	Individual [260] Supports plan as sound, legally compliant and DtC.	Noted
	Developers [60] & [566] & [919] supports recognition that greenfield land around settlements is required for release. (Developer [60] Promoting land south of Monkton Lane (LAA site 657), Developer [919] promoting former Weyburn Works site, at appeal )	Noted
	<b>Farnham Town Council</b> [514] support ALH1 – maximum deliverable and provides synergy with FNP.	Support welcomed.
	<b>Enterprise M3</b> [864] Supportive of the strategic approach, including Green Belt releases and specifically 2,300 new dwellings at Cranleigh and Farnham. Consider that the 'front-loading' of anticipated delivery is positive and proactive. [They refer to AHN1 but I think they mean ALH1]	Support welcomed.
Cranleigh	Individual [4] & [540] & [544] & [668] raises concerns regarding infrastructure, a consultation with 3.5% of the population responses (2014), detriment to the existing settlement, and impacts on affordability in the area if land values rise due to the allocation.	Disagree. Do not agree that the Spatial Strategy is unsound or unbalanced. As explained in 5.25, the Strategy does not distribute development evenly across the Borough. This is due to a range of factors, in particular the constraints that apply. Several options were tested through the SA and this found options that distribute development more evenly would perform poorly in terms of certain objectives. The results of the consultation responses have been taken into account.
	Individuals [31] & [45]& [99]& [297] & [392] & [416] & [434] & [600] Unsound to place 45% of total housing allocation in Cranleigh. Poor transport network, employment opportunities, flooding and sewerage	Disagree. Do not agree that the Spatial Strategy is unsound or unbalanced. As explained in 5.25, the Strategy does not distribute development evenly across the Borough. This is due to a range of factors, in



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	issues and impacts on Cranleigh waters.	particular the constraints that apply. Several options were tested through the SA and this found options that distribute development more evenly would perform poorly in terms of certain objectives. .
	Individual [744] Objection of development in Cranleigh re traffic, water supply and sewerage. Flawed consultation in 2014 that attracted little attention.	Disagree. Several spatial distribution options were tested through the SA and found that impacts on infrastructure could be mitigated. Infrastructure needs are dealt with in the IDP and ICS1. The results of the consultation responses were taken into account.
	<b>Wonersh Parish Council</b> [1161] & <b>Cranleigh Parish Council</b> [1063] object strongly to 4120 homes (48%) in Cranleigh and Dunsfold. Should be more adjacent to three towns. Contrary to para 34 of NPPF re ST.	Disagree. Do not agree that the Spatial Strategy is unsound or unbalanced. As explained in 5.25, the Strategy does not distribute development evenly across the Borough. This is due to a range of factors, in particular the constraints that apply. Several options were tested through the SA and this found options that distribute development more evenly would perform poorly in terms of certain objectives.
	Cranleigh Chamber of Commerce [499] & Cranleigh Civic Society [1101] concerned about the large number of homes suggested, and the impact on infrastructure including Cranleigh High Street if supermarket is built. Plus proximity of Cranleigh to Dunsfold means that they should not be treated separately.	Disagree. Several spatial distribution options were tested through the SA and found that impacts on infrastructure could be mitigated. Infrastructure needs are dealt with in the IDP and ICS1.
	Individual [6] & [740] Given recognition of infrastructure limitations (traffic) around Cranleigh, why is such a disproportionate amount of housing allocated there? Limited employment.	Disagree. Do not agree that the Spatial Strategy is unsound or unbalanced. As explained in 5.25, the Strategy does not distribute development evenly across the Borough. This is due to a range of factors, in particular the constraints that apply. Several options were tested through the SA and this found options that distribute development more evenly would perform poorly in terms of certain objectives.

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Dunsfold Aerodrome - against	Individual [391] DA is not suitable for housing.	Disagree. The SA concluded that the preferred option, which includes 2600 dwellings at DA is, on balance, represents sustainable development.
	Individual [398] DA inappropriate and unsustainable (traffic). Should be used for employment.	Disagree. The SA concluded that the preferred option, which includes 2600 dwellings at DA is, on balance, represents sustainable development.
	Individual [430] & [1120] DA unsustainable – traffic. <i>Unsound</i> . Infrastructure needs to be in place before the Plan can be considered. References comment from Cllr Davies re how the number of homes was decided upon.	Disagree. The SA concluded that the preferred option, which includes 2600 dwellings at DA is, on balance, represents sustainable development.
	<b>Hascombe Parish Council</b> [1252] DA should not be allocated as not known if transport and infrastructure can be satisfactorily addressed. Plus brownfield classification not justified (some of it is agricultural land and Ancient Woodland)	Disagree. The SA concluded that the preferred option, which includes 2600 dwellings at DA is, on balance, represents sustainable development.
	<b>Busbridge Parish Council</b> [989] The promotion of Dunsfold is not justified on the grounds that the previous consultation was flawed. Three out of the four housing scenarios consulted on in 2014 included substantial development on the site. The only scenario that did not include it was not presented favourably. Given that the consultation gave little choice not to choose Dunsfold the Council has construed this as a mandate for promoting the site. Furthermore only 3.5% of the Borough's residents filled in consultation forms, it is a brownfield site but this ignores the fact that the vast majority of the land is pasture. The transport consultants Waverley have commissioned conclude that Farnham is the most sustainable location and therefore the scenario that had no houses at Dunsfold is the most sustainable	Disagree. The SA concluded that the preferred option, which includes 2600 dwellings at DA is, on balance, represents sustainable development.  The results of the consultation responses were taken into account. Since 2014, further work has informed the strategy.

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	The east of the Borough has poor transport links but has significant housing allocated to it.	
	Individual [414] and CBRE [469] Plan does not show that DA would be sustainable.	Disagree. The SA concluded that the preferred option, which includes 2600 dwellings at DA is, on balance, represents sustainable development.
	Individual [463] and Developer [648] Dunsfold unsustainable (traffic). Other sites would better serve the housing need.	Disagree. The SA concluded that the preferred option, which includes 2600 dwellings at DA is, on balance, represents sustainable development.
	Individuals [349]& [644] object to DA – traffic.	Disagree. The SA concluded that the preferred option, which includes 2600 dwellings at DA is, on balance, represents sustainable development. The impact of combined development from Waverley and adjoining authorities has been taken into account, e.g. in the Strategic Highways Assessment.
	Individual [ 627] <i>Unsound (not positively prepared nor justified)</i> . Not convinced why 236 sites rejected in LAA as ‘outside settlement’ but then DA included as a strategic site. Dunsfold development is not where people want it.	Scale of DA would include sufficient infrastructure and community facilities provision to support development, rather than overloading existing facilities.
Dunsfold (village)	Individuals [580]& [644] Allocation should be reduced to 40 as it currently is higher than other small villages and village is in AGLV (could be upgraded to AONB).	Disagree. Dunsfold is less constrained than some villages and the LAA shows that there are sufficient suitable sites in this parish.
Haslemere	Developer [119] Support overall level of development but object to inadequate allocation at Haslemere. There are opportunities for development in sustainable locations within AONB around Haslemere. E.g. Sturt Road and Longdene House, Haslemere.	Noted. Haslemere is constrained by the AONB and Green Belt.
Ewhurst	Developer/Planning Agency [128] Should reduce emphasis on strategic sites and disperse allocations across Borough (outside of GB and AONB). Ewhurst has the potential to accommodate more,	Disagree. Spatial strategy has been justified through the SA. The allocation for Ewhurst is considered to be appropriate, given its status as a smaller village.

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	e.g. Chanrossa. Residents Association [663/664] WBC failed to make a proper assessment of the available housing sites/inconsistencies in the LAA.	Noted. No allocations proposed in LPP1. These issues will be picked up in LPP2.
	<b>Ewhurst Parish Council</b> [669] Strong commitment to meeting housing allocation numbers. Concentration of housing in the east makes it vital that NP is given opportunity to prevail.	Welcome commitment to meeting site allocation set in the Local Plan. The Council will support the parish council as it prepares its neighbourhood plan.
Farnham	<b>Farnham Town Council</b> [513] Para 6.16 does not refer to retained South East Plan Policy NRM6 which states that priority should be given to directing development to those areas where potential adverse effects can be avoided without the need for mitigation measures.	Disagree. In consultation with Natural England, the Avoidance Strategy is considered to be appropriate.
Milford/Witley	Developer [1103] suggests DA can only support 1800 homes as per current application. Infrastructure requirements too great for more, which may slow progress. (Suggest Milford and Witley could take more).	Disagree. SA has shown that DA can deliver, on balance, a sustainable settlement of 2600 homes. The allocation for Milford and Witley has been capped to reflect the level of services and facilities in the parish and the villages' position in the settlement hierarchy.
	Developers [936] & [1103] & [1190] support Milford and Witley as appropriate locations for resi, and suggest they are capable of supporting more than 380.	Noted.
	Developer [1184] supports release of GB land around Milford but proposals are not widespread enough for Milford which is a sustainable location.	Disagree – GB releases are based on GB review.
	Developer [1512] Fully support the allocation of residential development at Witley and Milford both of which are classified as larger villages and are highly sustainable	Support welcomed.
	<b>Alfold Parish Council</b> [1273] & <b>Plaistow &amp; Ifold Parish Council</b> [1009] <b>Hascombe Parish Council</b> [1253] why is the Council not proposing full number of LAA sites	Disagree. Do not agree that the Spatial Strategy is unsound. The allocation for Milford and Witley has been capped to reflect the level of services and facilities in

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	allocated in Milford/Witley as this is much more sustainable than Cranleigh.	the parish and the villages' position in the settlement hierarchy.
	Witley NP Steering Group [855] At least 380 is a significant step up from current levels.	Noted, but the allocation for the parish has been capped, even though more suitable sites are potentially available, given the level of services and facilities in the parish. The Council will work closely with the Parish Council and Steering Group as it prepares its neighbourhood plan.
	Individual [1046] Support Policy particularly allocation of 380 in Milford/Witley.	Support welcomed.
	<b>Witley Parish Council</b> [1071] Witley's housing target takes no account of the extra demands on infrastructure and services, and could be met by infill and brownfield development only. Enough to remove Witley and Milford from the Green Belt wash over. Prioritising single strategic sites privileges developers and ignores possibilities of site assembly of adjacent sites.	Disagree. The Green Belt Review has recommended the removal of some land around the two villages. However, the allocation for the parish has been capped, even though more suitable sites are potentially available, given the level of services and facilities in the parish. Policy ICS1 also states that infrastructure considered necessary to support new development must be provided on site, off site or through financial contributions.
	Individual [599] No justification for the cap in Milford and Witley.	Disagree. It is considered that a cap is appropriate for Milford and Witley even though more suitable sites are potentially available, given the level of services and facilities in the parish.
	Developer [1336] Suggests an additional strategic site in Milford.	Disagree. Strategic sites have been considered through due process.
	Developer [928] proposes site Adjacent to Rodborough College, Petham Road, Milford.	Noted. Something to be considered in LPP2.
Chiddingfold	<b>Chiddingfold Parish Council</b> [1206] disagrees with removal of main part of settlement from being washed over by the Green Belt. No space within settlement boundary.	Noted, but the GB review recommended that the existing settlement can be removed from the Green Belt without any significant damage to its strategic function. See the Green Belt Topic Paper for more detail.
	Developer [937] Redraft Policy to increase housing	Disagree. It is implicit in the Policy that these

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	provision in Chiddingfold/ make clear that 100 homes for Chiddingfold is minimum. Required number is in excess of 100	allocations are minima.
Alfold	Developer [567] Para 6.23 should refer to Alfold (including Alfold Crossways)	Noted. We will consider whether a change is necessary to clarify this.
Elstead	Individual [287] & [507] and <b>Elstead PC and Neighbourhood Plan</b> group [1195] & <b>Peper Harow Parish Council</b> [1235] Weyburn site is in Peper Harow not Elstead. Should not be developed, information in LAA is incorrect. Could continue to the employment use if anything but not housing. Concerns over the amount and location of housing. Unsustainable location. Object to Policy ALH1, Weyburn is an employment site.	Noted. It is our intention to make it explicit in the Plan that the allocation for Elstead assumes delivery on the Weyburn Works site, and we acknowledge that this is partly in Peper Harow parish. Not appropriate to change the Policy but suggested <i>minor mod</i> to supporting text.
Para 6.13 Infrastructure need	Developer [1311] not sound to state that no fundamental infrastructure issues arising from planned growth in Waverley given issues in Cranleigh, Dunsfold, Bramley and Alfold. Echoed by Individual [40] re schooling.	Consider re-wording this para to 'Whilst some improvements to infrastructure will be required, the evidence indicates that there are no <b>fundamental insurmountable</b> issues arising from the growth planning in Waverley'. <i>Minor mod</i>
Other (minor)	Individual [696] querying significance of dotted line on map.	This query relates to the existing Proposals Map. The dotted line means it is AGLV treated as being within the Surrey Hills AONB (dotted line with full (not dotted) hatched lines).
	Individual [280] Suggests that in para 6.19 local needs means parish need.	Disagree – people and their needs are not defined by parish boundaries.

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Section/ paragraph no./Policy	Key Issues Raised	Council Response
<b>Introduction - Paragraphs 7.1-7.3</b>	Paragraph 7.1 is not sound, nor does it comply with DtC as views of residents have not been taken into account.	Disagree – the Plan is considered sound, the public consultations responses are reported and the Plan is democratically agreed by Waverley Borough Council's elected Councillors.
<b>Introduction - Paragraphs 7.1-7.3</b>	Paragraph 7.3 appears to fail to convey the reality of what has actually happened in regard to buses - an additional wording is proposed as follows: <i>"A subsequent Surrey County Council review, again to make financial savings, has effected changes to bus services in the Borough. One of these is a reduction in frequency of the Monday to Saturday service to Aarons Hill Estate, an area with a relatively low car ownership compared with many other parts of West Surrey. The importance is recognised of attempting to measure the social and environmental effects of such changes, and – in harmony with paragraph 7.6 – the Council will co-operate with local councils and Surrey County Council to this end."</i>	Noted. No changes required.
<b>Policy Context and Delivering Sustainable Transport - Paragraphs 7.4-7.11.</b>	Emphasis on cars being the primary form of transport is not recognised in the transport plans; policy will not achieve its objective, resulting in worse congestion. (Chiddingfold Parish Council)	Disagree – The text in Section 7 recognises the challenges regarding car ownership in Waverley. In addition, car ownership levels have been taken account of in the Surrey County Council Strategic Highway Assessment and the modelling results provide a 'worst case' assessment as no account is taken of future modal shift or Travel Plans.
<b>Policy Context and Delivering Sustainable Transport - Paragraphs 7.4-7.11.</b>	Other development locations with better transport links have not been thoroughly investigated. (Plaistow and Ifold Parish Council)	Disagree – the strategy has been developed taking account of transport considerations.
<b>Policy Context and Delivering Sustainable Transport - Paragraphs 7.4-</b>	The Plan should be re-balanced to place the proposed housing in locations that have sufficient existing transport infrastructure. (Bramley Village	Disagree – the sites included in the Plan currently have or are capable of having sufficient transport infrastructure once suitable transport mitigation has

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7.11.	Society)	been provided. This is set out in the Infrastructure Delivery Plan. A judgement has been made on all of the sustainability issues that affect sites including transport infrastructure and travel by more sustainable modes of transport.
<b>Policy Context and Delivering Sustainable Transport</b> - Paragraphs 7.4-7.11.	The Plan does not differentiate between the better quality roads in the Farnham area and the poor quality road to the south and east of the borough. Therefore it nonsensical to propose putting the largest proportion of new housing in the most inaccessible parts of the Borough. (Cranleigh Civic Society, Dunsfold Parish Council, Plaistow and Ifold Parish Council)	Disagree – the Plan recognises the hierarchy of roads in the borough and the Surrey County Council Strategic Highway Assessment and the Mott MacDonald Local Transport Assessment suitably assess the different road types and the impact of the Plan allocations on the link and junction capacities. A judgement has been made on all of the sustainability issues that affect sites including transport infrastructure and travel by more sustainable modes of transport.
<b>Policy Context and Delivering Sustainable Transport</b> - Paragraphs 7.4-7.11.	Development at Dunsfold Aerodrome based on assumptions that development at DA could be sustainable despite the conclusions of the 2009 Appeal and Secretary of State’s ruling that Dunsfold Aerodrome is located in an unsustainable location. (Plaistow and Ifold Parish Council)	Disagree. The planning application and Appeal was decided against different planning circumstances. It is considered that subject to the necessary infrastructure being provided, including highways improvements, the benefits of redeveloping Dunsfold Aerodrome for housing and other uses outweigh other concerns, including the relatively isolated location of the site.
<b>Policy Context and Delivering Sustainable Transport</b> - Paragraphs 7.4-7.11.	Although it is not the job of the Local Plan to provide acceptable and viable infrastructure solutions in detail, the Plan should acknowledge more fully the need for these to support development. The current draft fails to do this and to deal with the realities of the very limited transport options in the absence of huge investment.	Disagree. Suitable mitigation is identified in the IDP.
<b>Policy Context and Delivering Sustainable Transport</b> - Paragraphs 7.4-7.11.	Dunsfold Park development does not abide by the parking guidelines stated in para 7.8.	Noted. For any Dunsfold Park planning application the proposed parking provision will be judged in accordance with the Car Parking Guidelines in force at the time of the planning committee. One of the key concerns of insufficient car parking is the implications of parking overspill onto the wider highway network and the road



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		safety implications alongside amenity issues. This is judged on a site-by-site basis.
<b>Policy Context and Delivering Sustainable Transport</b> - Paragraphs 7.4-7.11.	The parking guidelines will result in a shortfall with resulting overspill car parking in local villages.	Disagree. For any planning application the proposed parking provision will be judged in accordance with the Car Parking Guidelines in force at the time of the planning committee. One of the key concerns of insufficient car parking is the implications of parking overspill onto the wider highway network and the road safety implications alongside amenity issues. This is judged on a site-by-site basis.
<b>Policy Context and Delivering Sustainable Transport</b> - Paragraphs 7.4-7.11.	Reduce public and private car parking in the future and re-develop these sites for high density mixed uses particularly in urban areas.	Noted. If it can be demonstrated that parking is no longer required then the land could be used for alternative uses.
<b>Policy Context and Delivering Sustainable Transport</b> - Paragraphs 7.4-7.11.	Request clearer policy support for cycle routes proposed in Waverley Cycling Plan – little progress has been made on implementing the routes since plan of 2005. (Godalming Town Council)	Noted. The Waverley Cycling Plan Supplementary Planning Document (SPD) is already a material consideration in planning application determination. The IDP includes a number of cycling improvements.
<b>Policy Context and Delivering Sustainable Transport</b> - Paragraphs 7.4-7.11.	Walking and cycling is not given enough importance in the Plan in relation to its role in promoting sustainable transport	Disagree. The Policy ST1 has been prepared in accordance with NPPF and gives the appropriate importance to cycling and its role in promoting sustainable transport.
<b>Policy Context and Delivering Sustainable Transport</b> - Paragraphs 7.4-7.11.	Existing lack of pedestrian facilities, infrequent bus services and poor bus facilities and high levels of pollution should be recognised. (Dunsfold Parish Council)	Noted. The Policy ST1 has been prepared in accordance with NPPF and gives the appropriate importance to walking, cycling, public transport, air quality and its role in promoting sustainable transport.
<b>Policy Context and Delivering Sustainable Transport</b> - Paragraphs 7.4-7.11.	Welcome improvements to rights of way, however not realistic to use routes for anything other than recreation due to terrain. (Hascombe Parish Council, Plaistow and Ifold Parish Council)	Noted. It is accepted that despite improvement some PROW routes would continue to only offer recreational uses but there are many routes that following upgrade could be used for alternative travel uses. These are set out in the IDP which has been prepared in coordination with

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		SCC as Local Highway Authority. Individual sites would need to meet Policy ST1 which includes accessibility by non-car modes.
<b>Policy Context and Delivering Sustainable Transport</b> - Paragraphs 7.4-7.11.	The local roads in the Borough are poor and narrow, they are not well maintained, often overgrown with undergrowth and trees in Summer, they are not suitable for cycles - and the distance to the main stations makes use totally impractical especially in winter and during darkness	Disagree. It is accepted that a proportion of roads may not be currently suitable for cyclists, particularly those who are less experienced or young cyclists. However, SCC has not raised an in principle concern regarding this in their formal response to the Local Plan.
<b>Policy Context and Delivering Sustainable Transport</b> - Paragraphs 7.4-7.11.	The Plan endangers users of footpaths and bridleways	Disagree. Any proposal that endangered the users of footpaths and bridleways would not be accepted by the Highway Authority. SCC as Local Highway Authority has not raised concerns regarding this in their formal response to the Local Plan.
<b>Transport Assessments - General points-</b> paragraphs 7.12-7.16	The transport evidence base is considered an insufficient basis from which to conclude that the growth has been assessed comprehensively in the plan, or whether the essential mitigation can be delivered to support housing delivery. (Plaistow and Ifold Parish Council)	Disagree. Highways England as Strategic Highway Authority and Surrey County Council as Local Highway Authority have not raised any in-principle objections to the transport evidence base.
	Paragraph 7.14 is sound as, based on evidence, it recognises that most of the major routes in and around Farnham are traffic 'hotspots'. (Farnham Town Council)	Noted.
<b>Strategic Highway Assessment</b> – Surrey County Council (August 2016)	The SHA draws attention to more detailed assessments being required to identify the delivery of mitigation. However the LTA, which considers this in more detail, is not for the same scale of growth. This needs to be updated.	Disagree. The LTA assessed a higher quantum of growth at Dunsfold (up to 3,400 houses) compared to the Local Plan spatial strategy and therefore adequately modelled the scale of transport mitigation required which is included in the IDP.
<b>Strategic Highway Assessment</b> – Surrey County Council (August 2016)	Concerns regarding SCC's SHA and capability to accurately represent the full traffic impacts: <ul style="list-style-type: none"> <li>• More information is required on the model development;</li> </ul>	Disagree. The SCC SINTRAM model is an accepted strategic modelling tool that has been used to support a number of Local Plans through to adoption. The Surrey County

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	<ul style="list-style-type: none"> <li>• Base year of 2009 potentially not reflective of traffic conditions;</li> <li>• Model validation – no journey time validation on some links;</li> <li>• Average peak hour not reflective;</li> <li>• Combined effects of Guildford and Waverley growth – need assessing in more detail;</li> </ul> <p>Highway England’s response is important and should be sought.</p>	<p>Council Strategic Highway Assessment (August 2016) is a joint assessment with Guildford Borough Council that investigates the impact of the traffic flow increases from Guildford Borough Council's proposed submission Local Plan alongside Waverley Borough Council's proposed submission Local Plan. Therefore the cumulative impact of both Local Plans have been assessed and reported.</p> <p>Highway England’s response does not raise any soundness issues.</p>
<p><b>Strategic Highway Assessment</b> – Surrey County Council (August 2016)</p>	<p>Before further major construction is approved, a full understanding of the traffic implications of current building within and close to Waverley should be sought</p>	<p>Disagree.</p> <p>The Surrey County Council Strategic Highway Assessment (August 2016) is a joint assessment with Guildford Borough Council that investigates the impact of the traffic flow increases from Guildford Borough Council's proposed submission Local Plan alongside Waverley Borough Council's proposed submission Local Plan. Therefore the cumulative impact of both Local Plans have been assessed and reported. The SHA also takes account of growth from neighbouring boroughs and the UK as a whole.</p>
<p><b>Strategic Highway Assessment</b> – Surrey County Council (August 2016)</p>	<p>Waverley’s and adjacent borough road network will not have sufficient transport infrastructure to accommodate the growth in traffic flows from development. (Chiddingfold Parish Council)</p>	<p>Disagree.</p> <p>The impact of the Local Plan including Guildford’s proposed Local Plan and wider growth from adjacent LPAs has been assessed in the SCC SHA. The assessments have been used to determine the key transport infrastructure requirements and these have also been assessed and are included in the IDP. Highways England as Strategic Highway Authority and Surrey County Council as Local Highway Authority have not raised any in-principle objections to the transport evidence base.</p>
<p><b>Strategic Highway Assessment</b> – Surrey County Council (August</p>	<p>There is insufficient existing infrastructure in Dunsfold and Cranleigh to accommodate the traffic flow increases. (Cranleigh Civic Society, Dunsfold</p>	<p>The proposed transport infrastructure for Dunsfold and Cranleigh has been agreed with Surrey County Council as Local Highway Authority and is included in the IDP.</p>

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2016)	Parish Council, CPRE)	Policy ST1 ensures that developments will provide the appropriate infrastructure to accommodate the traffic flow increases.
<b>Strategic Highway Assessment</b> – Surrey County Council (August 2016)	Cranleigh’s road network will not have sufficient transport infrastructure to accommodate the growth in traffic flows creating queuing, road safety issues and air quality issues. (CPRE)	The proposed transport infrastructure for Cranleigh has been agreed with Surrey County Council as Local Highway Authority and is included in the IDP. Policy ST1 ensures that developments will provide the appropriate infrastructure to accommodate the traffic flow increases.
<b>Strategic Highway Assessment</b> – Surrey County Council (August 2016)	The impact of development at Farnham and to the west of Guildford must be accounted for in terms of traffic levels on the A31 and the combined impact this will have when considered alongside other potential sites such as Blackwell Farm. The A31 suffers major congestion and Guildford's minor improvement schemes will make no discernable difference. Improvements on the A3 will in fact make matters worse for surrounding villages as more traffic will cut through popular routes to reach the A3 in the event of major improvements. Only radical change will make the difference needed. (Compton Parish Council)	Disagree. The impact of the Local Plan including Guildford’s proposed Local Plan and wider growth from adjacent LPAs has been assessed in the SCC SHA. The assessments have been used to determine the key transport infrastructure requirements and these have also been assessed and are included in the IDP. Highways England as Strategic Highway Authority and Surrey County Council as Local Highway Authority have not raised any in-principle objections to the transport evidence base.
<b>Local Transport Assessment</b> - Stage 2 – A281 Corridor including Dunsfold (Mott MacDonald Report)	The A281 and Bramley’s road network will not have sufficient transport infrastructure to accommodate the growth in traffic flows creating queuing, road safety issues, air quality issues and affecting access for emergency vehicles. (Bramley Village Society, CPRE)	Disagree. The work undertaken by SCC in their SHA and by Mott MacDonald in their LTA suggests that the level of growth proposed in the Local Plan can be accommodated once key junctions and links have been improved. The improvements that are required (capacity, road safety) are set out in the IDP and have been costed. When the capacity issues are addressed there is no evidence that there will be access issues for emergency vehicles.
<b>Local Transport Assessment</b> - Stage 2 – A281 Corridor including	Inconsistencies with the IDP and Mott MacDonald LTA around highway schemes in Cranleigh and Bramley particularly on A281.	Disagree. The LTA was developed to specifically look at the traffic impact of the Local Plan. The IDP incorporates all of

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Dunsfold (Mott MacDonald Report)		the transport infrastructure requirements including those already partly funded (S106 contributions in Cranleigh). Developers may identify different transport solutions that may equally be acceptable to the Highway Authority.
<b>Local Transport Assessment</b> - Stage 2 – A281 Corridor including Dunsfold (Mott MacDonald Report)	Shalford's road network (A281 in particular) will not have sufficient transport infrastructure to accommodate the growth in traffic flows creating queuing, road safety issues, air quality issues and affecting access for emergency vehicles.	Disagree. The work undertaken by SCC in their SHA and by Mott MacDonald in their LTA suggests that the level of growth proposed in the Local Plan can be accommodated once key junctions and links have been improved. The improvements that are required (capacity, road safety) are set out in the IDP and have been costed. When the capacity issues are addressed there is no evidence that there will be access issues for emergency vehicles.
<b>Local Transport Assessment</b> - Stage 2 – A281 Corridor including Dunsfold (Mott MacDonald Report)	The proposed mitigation in Bramley as suggested in the Mott MacDonald Technical Notes will not improve traffic conditions. (Bramley Village Society)	Disagree. The work undertaken by SCC in their SHA and by Mott MacDonald in their LTA suggests that the level of growth proposed in the Local Plan can be accommodated once key junctions and links have been improved. The improvements that are required (capacity, road safety) are set out in the IDP and have been costed.
<b>Local Transport Assessment</b> - Stage 2 – A281 Corridor including Dunsfold (Mott MacDonald Report)	Locally prepared traffic and queue length surveys in Bramley undertaken during term time and outside of term time demonstrate the level of existing congestion that occurs. (Bramley Village Society)	Noted
<b>Local Transport Assessment</b> - Stage 2 – A281 Corridor including Dunsfold (Mott MacDonald Report)	Vision Transport Planning's Review of Mott Mac Transport Assessment Stage 1 & 2 Reports for the Joint Parish Councils exposed serious shortfalls in the reports relating to the A281. In particular the peak traffic flows have been significantly under estimated by averaging over several hours.	Disagree. Surrey County Council is content that the transport evidence base for the Local Plan is robust.
<b>Local Transport</b>	As part of the Local Plan process and before	Noted.

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<p><b>Assessment - Stage 2 – A281 Corridor including Dunsfold (Mott MacDonald Report)</b></p>	<p>granting permission for the development of Dunsfold Park the borough council should:</p> <p>(a) undertake an in depth strategic review of the roads infrastructure in the area along the A281 corridor to ascertain the potential impact of the proposed development on rural and other roads in the area; and</p> <p>(b) actively investigate the merits of an alternative to the use of the A281 and the related transport infrastructure, including a new road linking the Dunsfold Park site directly to the A3. and then modify the Local Plan accordingly.</p>	<p>A planning application for any large scale development will require a Transport Assessment. It is for the applicant in coordination with the Highway Authority to investigate and mitigate the identified traffic impact on the road network. For the Local Plan, it is the duty of the Local Planning Authority to identify the key transport infrastructure improvements that are required to mitigate against the planned level of growth. This has been undertaken and the infrastructure required is set out in the IDP.</p>
<p><b>Local Transport Assessment - Stage 2 – A281 Corridor including Dunsfold (Mott MacDonald Report)</b></p>	<p>A281 Bramley – mitigation should include a bypass of the village.</p>	<p>Disagree. The SHA and LHA demonstrate that local improvements to junctions and links will mitigate the impact of the planned Local Plan growth</p>
<p><b>Local Transport Assessment – Stage 3 - Farnham Traffic Model (Mott MacDonald Report)</b></p>	<p>Para. 7.19 is extremely optimistic and we are surprised that transport assessments have concluded that the existing network can cope with proposed developments. Farnham has huge traffic congestion problems at peak times with associated pollution issues and we are not convinced that mitigation measures alone can alleviate the problems. More specific measures are required to address persistent traffic congestion and pollution issues around Farnham, such as a Western By-Pass, Wrecclesham By-Pass, Hinkley's Corner underpass and other bottlenecks.(Rowledge Residents Association)</p>	<p>Noted. The infrastructure improvements required in the Farnham area are set out in the IDP. The justification for these are set out in the Mott MacDonald LHA.</p>
<p><b>Local Transport Assessment - Stage 4 – Wider Transport Sustainability Issues (Mott</b></p>	<p>The conclusions of the Mott MacDonald Stage 4 report have not been taken into account when allocating the Dunsfold Aerodrome site (transport sustainability) (Hascombe Parish Council, Alfold</p>	<p>Disagree. The Mott MacDonald Stage 4 Report identified the key issues for sustainability in relation to transport for the three main areas where new homes could be provided.</p>

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MacDonald Report)	Parish Council, Dunsfold Parish Council, Plaistow and Ifold Parish Council)	The report identified that the Dunsfold Aerodrome site was the least sustainable of the three main areas which included Farnham and Cranleigh. This is different from stating that the Dunsfold Aerodrome site is not sustainable on transport grounds. National Planning Policy Framework states at paragraph 29 that "...the Government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas."
<b>Strategic Road Network Impacts</b> (Responsibility of Highways England)	The A3 (junctions A31 to A320) need to be improved and traffic issues need to be addressed as soon as possible. (Haslemere Town Council, Bramley Village Society)	Noted. The Department for Transport's Road Investment Strategy has identified the need for an improvement to this section of the A3 in Road Period 2 (2020-2025). Highways England has confirmed that they do not see the Strategic Road Network being a constraint to the planned level of growth in the Local Plan.
<b>Strategic Road Network Impacts</b> (Responsibility of Highways England)	The large scale of the Dunsfold Aerodrome site may lead to an impact on the A3. To confirm that the site is deliverable, proposals must demonstrate the site's impact on the SRN and as necessary provide suitable mitigation in line with Policy ST1. Highways England recommends early dialogue on any emerging mitigation proposals that could directly or indirectly impact the A3. (Highways England)	Noted. Highways England has responded that they have no objection to the planning application for 1,800 homes at Dunsfold Aerodrome. We will continue to work with Highways England to identify whether 2,600 homes as proposed in the Local Plan will have an additional impact that will required mitigation proposals. There is no evidence that the planned level of growth cannot be accommodated on the highway network.
<b>Strategic Road Network Impacts</b> (Responsibility of Highways England)	The Road Investment Strategy for the 2015/16 – 2019/20 (Department for Transport, March 2015) provides funding for developing an A3 Guildford scheme during the period up to 2019/20 with delivery of this scheme anticipated to start in the next Road Period between 2020/21 and 2024/25. At time of preparation of our Guildford borough Proposed Submission Local Plan: strategy and sites (June	Noted. Highways England has not formally advised Waverley Borough Council that the timescales are different to the Road Investment Strategy. We will seek to clarify this with Highways England.

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	<p>2016), Highways England had advised Guildford Borough Council that, if the scheme is approved with funding agreed, construction is unlikely to start until 2023 at the earliest. Guildford Borough Council had assumed that the scheme will be constructed between 2023 and 2027 in formulating its Guildford borough Proposed Submission Local Plan: strategy and sites (June 2016). This is set out in paragraph 5.79 of our Topic Paper: Transport (Guildford Borough Council, June 2016). More recently, Highways England has revised its advice; it now considers that construction could commence in 2024 at the earliest, with completion by 2027. The above is somewhat different from the assumptions described and attributed to Guildford Borough Council in the final sentence of paragraph 7.21 in your document. <b>(Guildford Borough Council)</b></p>	
<p><b>Strategic Road Network Impacts</b> (Responsibility of Highways England)</p>	<p>The Plan notes that it is important to consider the impact of its building development on surrounding areas such as Guildford. Guildford's own Local Plan was considered to be flawed due to the A3 having reached capacity between Guildford and the M25 junction. This has prevented/slowed down the opportunity for Wisley Airfield to be used for development. Also it would appear that there has been no consideration of the impact Dunsfold would have on the traffic capacity on the A3. It is possible, that with the delivery of Wisley, Highways England would consider the Dunsfold development inappropriate not just because of its impact on the A3 but also in relation to its impact on the town centres of Guildford and Godalming, etc.</p>	<p>Disagree. We are not aware that Highways England has stated that the Guildford Borough Council's Local Plan is flawed. The SHA is a joint assessment that reviews the impact of both Guildford Borough Council's and Waverley Borough Council's Local Plan. The Wisley Airfield planning application was refused with highway reasons for refusal as in the Council's opinion it has not been demonstrated that the traffic impact had been adequately mitigated.</p>
<p><b>Strategic Road Network Impacts</b> (Responsibility of Highways England)</p>	<p>The Local Plan is being progressed on "understanding of improvements to the A3". This is not an adequate basis for a local plan. The whole</p>	<p>Disagree. Highway England's response has not raised any soundness issues on the proposed Local Plan.</p>



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	plan is based on conjectural mitigation measures on the highway network.	
<b>Strategic Road Network Impacts</b> (Responsibility of Highways England)	I am amazed that it would appear from the Plan that Highways England “has not identified any particular areas of concern regarding the roads in Waverley”. I would add that any increase in traffic into and through Guildford, including the A3, would have serious consequences on a road network already at capacity.	Noted. The impact of the Waverley Local Plan on Guildford’s Strategic and Local road network has been assessed in the SHA.
<b>Rural roads impact</b>	The lanes to Hascombe and Milford for access to Godalming and the A3 are not designed for such massive increase in car and heavy vehicle traffic. (CPRE)	Noted. There are proposed traffic management measures in the IDP to address any impact on these roads.
<b>Rail impact</b>	It is considered that Paragraph 7.23 should be revised as follows: <i>“At railway stations, every effort must be made to achieve integrated transport to a far greater extent than previously. In this context, the Council is pleased that a bold scheme has been implemented recently at Godalming Station for improved accessibility, including passenger lifts, as well as enhanced cycle parking. The Council, being aware of at least one or two railway stations in the Borough which have no direct bus service to them even though buses operate in the vicinity, will seek – in co-operations with local councils and Surrey County Council – to change this situation for the better. There are also many improvements needed to benefit pedestrian and cycle access to stations. Car-parks at the main railway stations in Waverley are well used and proposals to increase their capacity, where appropriate, will be encouraged. Proposals by Network Rail for decked car-parks at Farnham and Haslemere are well advanced”</i> .	Noted. It is considered that the existing wording is adequate.
<b>Rail impact</b>	No assessment has been made of the impact of the Plan on the increased demand for rail services.	Network Rail has assessed the impact of growth from the Local Plan in the Wessex Route Study. This is used

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	Existing services are at capacity during peak periods.	by Government to inform future spending requirements to accommodate the increase in passenger numbers.
<b>Rail impact</b>	There is only one main station in Waverley at Haslemere, with 4 trains per hour to London (WAT) and three to Portsmouth (PMT), the other stations are all minor stops with less services. Witley and Milford have one train per hour - one to WAT and one to Haslemere (HSL). Godalming and Farncombe have two trains per hour to WAT, and one per hour to PMT and one to HSL. There is a small station in Farnham on the single track Alton Branch line.	Noted.
<b>Infrastructure Delivery Plan</b>	The Plan does not demonstrate how the required transport infrastructure is to be funded and provided.(CPRE, <b>Plaistow and Ifold Parish Council</b> )	Noted. More work is being undertaken on the IDP to identify costs in more detail. This will be developed alongside evidence provided to justify the charging schedule in the Community Infrastructure Levy.
<b>Infrastructure Delivery Plan</b>	No timescales are given for delivery of the mitigation, particularly related to the large scale allocations. This will affect the delivery of housing.	Noted. More work is being undertaken on the IDP to identify timescales in more detail.
<b>Infrastructure Delivery Plan</b>	The infrastructure costs in the IDP are unrealistic and unable to be funded. (CPRE)	Noted. More work is being undertaken on the IDP to identify costs in more detail. This will be developed alongside evidence provided by the Community Infrastructure Levy.
<b>Infrastructure Delivery Plan</b>	There is no detail on the appropriate infrastructure and mitigation for the Dunsfold Aerodrome site in the Plan particularly in Bramley and Shalford.	The Local Plan does not need to set out in detail each highway and transport improvement but it does need to demonstrate that schemes are feasible and can be funded and delivered to mitigate the transport impacts making reference to the housing trajectory timescales and where development will occur.
<b>Infrastructure Delivery Plan</b>	Impact of development traffic in Godalming will be unacceptable despite the improvements proposed in the IDP	Noted. The SHA identified the key 'hotspots' and where necessary improvements have been identified.
<b>Infrastructure Delivery Plan</b>	Question the need for a 'quality' cycle lane between Milford and Farncombe	Noted. This scheme is being proposed by Surrey County

## Chapter 7. Sustainable Transport

### Key stakeholders highlighted

		Council.
<b>Infrastructure Delivery Plan</b>	An improvement should be included in the Plan to the off-road cycle facilities to ensure a continuous off-A281 cycle option for all from Cranleigh to Guildford.	Noted. It is considered that the Downs Line Link is a more appropriate north-south cycle route between Cranleigh and Guildford.
<b>Infrastructure Delivery Plan</b>	No mention has been made of the possibility of a park and ride facility (at Farnham).	Noted. This has not been identified as being necessary by Surrey County Council
<b>Cross Boundary Transport Impacts</b>	It is considered that the forecast for the cross-boundary impact on the northbound A281 Horsham Road is illogical and it is also inconsistent with the transport assessment work undertaken by Mott MacDonald Ltd for Waverley Borough Council and by Vectos for the promoters of the Dunsfold Aerodrome site. Cannot form a view on acceptability of Dunsfold allocation due to this. (Guildford Borough Council)	SCC has been consulted. Meeting to be held with GBC to discuss cross-boundary concerns.
<b>Cross Boundary Transport Impacts</b>	A31/A331 roundabout (Tongham) – impact on this junction needs further assessment and discussion due to significant additional cross boundary flows. (Guildford Borough Council)	Meeting to be held with GBC to discuss cross-boundary concerns. This junction is included in the IDP
<b>Cross Boundary Transport Impacts</b>	Rushmoor Borough Council has agreed to engage further with Waverley Borough Council and seek to engage with Guildford Borough Council, Hampshire County Council and Surrey County Council to ensure that any potential cross boundary strategic transport issues arising from development proposed in these areas are appropriately mitigated and to work jointly on enabling these mitigation solutions to be delivered. (Rushmoor Borough Council)	Noted. Waverley Borough Council will continue to work with Rushmoor Borough Council, Hampshire County Council and Surrey County Council to ensure that any cumulative cross-boundary impacts are identified and where necessary mitigation is identified and included in the Infrastructure Delivery Plan alongside agreed funding arrangements.
<b>Cross Boundary Transport Impacts</b>	Failure to identify transport requirements beyond year 2032 and to protect the prospectively required traffic corridors	Disagree. Surrey County Council and Highways England are the local and strategic highway authorities within Waverley Borough Council.

## Chapter 7. Sustainable Transport

### Key stakeholders highlighted

		As part of Duty to Cooperate meetings Waverley Borough Council has not been requested to safeguard land or take account of transport improvements proposed beyond the Local Plan period (2032).
<b>Cross Boundary Transport Impacts</b>	Plan does not incorporate any discussions with Guildford Borough on how to integrate the Dunsfold Aerodrome development with proposed housing developments to the north of Guildford. Plan does not consider the impact of Guildford developments in Artington and Shalford Parishes on Godalming.	Disagree. The Surrey County Council Strategic Highway Assessment (August 2016) is a joint assessment with Guildford Borough Council that investigates the impact of the traffic flow increases from Guildford Borough Council's proposed submission Local Plan alongside Waverley Borough Council's proposed submission Local Plan. Therefore the cumulative impact of both Local Plans have been assessed and reported. This includes the proposed site allocations in Shalford and Artington Parishes. Guildford Borough Council and Waverley Borough Council have discussed and agreed the scope of the Strategic Highway Assessment during Duty to Cooperate meetings. The Infrastructure Delivery Plan includes transport proposals in Guildford borough to mitigate the traffic impact of the Local Plan, particularly relating to the Dunsfold Aerodrome proposal.
<b>General Traffic Impact Comments</b>	Flooding closes access roads and this should be recognised as a constraint.	Noted. Flooding can impact on the suitability of sites for development and this is taken account of in allocating sites and granting planning permission.
<b>General Traffic Impact Comments</b>	The impact of additional HGVs will be unacceptable on the highway network (safety/pollution).	Surrey County Council and Highway England have not identified that the additional HGVs generated by the Local Plan will be unacceptable. The IDP identified traffic management measures to mitigate against the impact of HGVs.
<b>General Traffic Impact Comments</b>	The road capacity is especially congested during term time and more active efforts should be made to incentivise and penalise parents and schools to stop personal car transport - for example use small buses	Noted. Travel Planning is an important part of reducing the impact of development. SCC as highway authority are responsible for this.

## Chapter 7. Sustainable Transport

### Key stakeholders highlighted

	and car sharing as mandatory.	
<b>General Traffic Impact Comments</b>	The buses are too wide for the country roads and too expensive to encourage people to use them	Noted.
<b>Policy ST1 Sustainable Transport - General Comments</b>	Supportive of the wording of the policy. (Highways England, Surrey Wildlife Trust, Surrey Nature Partnership, Elstead Parish Council)	Support Welcomed
<b>Policy ST1 Sustainable Transport - General Comments</b>	Policy ST1 should provide for additional facilities within a development, such as schools, to reduce the distance travelled to alternative or existing facilities and enhance sustainability.	Noted. Large developments are required to fund additional education facilities.
<b>Policy ST1 Sustainable Transport - General Comments</b>	Policy ST1 - welcome the emphasis on Sustainable Transport throughout plan but suggests an added recognition of the limitations associated with this, and that investment is required in the strategic road infrastructure, particularly A31 through Farnham (Hickley's Corner identified improvement) and planned investments in the A3 between 2024-2029. Suggest an additional policy on investment in transport infrastructure as important to the delivery of the plan, including major road and rail. (M3 LEP)	Noted. Infrastructure is important but it is noted that Highways England are not objecting to the level of growth planned or requiring a restriction on growth until the Roads Programme schemes are implemented. We do not consider that an additional policy on investment in infrastructure will give any more weight to the Local Plan
<b>Policy ST1 Sustainable Transport - General Comments</b>	Policy is laudable but difficult to achieve. Are initiatives sufficient to prevent detrimental impact from large new housing developments? Transport was used to refuse Dunsfold in 2009.	Highways England and Surrey County Council are supportive of the Local Plan measures.
<b>Policy ST1 Sustainable Transport - General Comments</b>	Generally, Policy ST1 (Sustainable Transport) needs to make more explicit reference to the role that Neighbourhood Plans and town and parish councils should play in improving non-vehicular movement in particular. This should include particular reference in the first sentence as to who 'key stakeholders' include, i.e. town and parish councils and Neighbourhood Plan groups. (Godalming Town Council)	Disagree. This is covered in national policy. Additional wording is not necessary.
<b>Policy ST1 Sustainable Transport - General Comments</b>	No provision for reopening of the Cranleigh Railway Line.	Network Rail has no plans to re-open the Cranleigh to Guildford railway line and Surrey County Council as

## Chapter 7. Sustainable Transport

### Key stakeholders highlighted

Comments		highway authority has not requested that this route be safeguarded for any transport improvement. Improved public transport links in the Cranleigh area listed in the Infrastructure Delivery Plan including those related to the Dunsfold Aerodrome proposed site allocation.
<b>Policy ST1 Sustainable Transport - General Comments</b>	It is essential that Waverley work closely with Surrey County Council on transport matters. Unfortunately, they have not always listened to them in the past, or have 'reinterpreted' information in a misleading way.	Waverley Borough Council continue to work closely with Surrey County Council and Highway England on transport matters.
<b>Policy ST1 Sustainable Transport - General Comments</b>	There are no sustainable transport plans	Disagree. Sustainable transport is a key component of the Local Plan
<b>Policy ST1 Sustainable Transport - General Comments</b>	The Plan is well written and comprehensive. I am in favour of the ambition to increase the available housing in Waverley.	Support welcomed.
<b>Policy ST1 Sustainable Transport - General Comments</b>	Farnham – no reference to the reconstruction and upkeep of the roads related to new development	Disagree. This is an integral part of the planning process and does not need reference in the Local Plan.
<b>Policy ST1 Sustainable Transport - General Comments</b>	Better integration is required with Neighbourhood Plans and reference is required in the policy to them. (Godalming Town Council)	Disagree. The wording is considered sufficient.
<b>Policy ST1 (bullet 1)</b>	Land around Witley Station is well located to more sustainable transport modes (public transport) and are logical for allocating,	Noted.
<b>Policy ST1 (bullet 1)</b>	POW requests WBC to consider removing inconsistencies, viz:- (para 1) Development at Dunsfold Aerodrome is in direct conflict with this policy '(to locate development schemes) where it is accessible by forms of travel other than the private car' – the change is through changing Policy SS7.	Disagree. Sustainable transport is one element of a wider planning balance. Measures are set out in the IDP to seek to make the site as sustainable as possible from a transport perspective.
<b>Policy ST1 (bullet 1)</b>	Dunsfold Aerodrome site is not a sustainable location for either large scale housing or commercial	Disagree. Sustainable transport is one element of a wider planning

## Chapter 7. Sustainable Transport

### Key stakeholders highlighted

	development. Contrary to NPPF. (Hascombe Parish Council, Alford Parish Council, Dunsfold Parish Council, CPRE, POW, Plaistow and Ifold Parish Council)	balance. Measures are set out in the IDP to seek to make the site as sustainable as possible from a transport perspective.
<b>Policy ST1 (bullet 1)</b>	Welcome point 1 of draft Policy ST1.	Support Welcomed.
<b>Policy ST1 (bullet 1)</b>	We have no comments on Policy ST1. However as noted above it appears that the proposals concerning Cranleigh and Dunsfold directly conflict with paragraph 1 of ST1 which requires development schemes “are located where it is accessible by forms of travel other than the private car”. (Wonersh Parish Council)	Disagree. Sustainable transport is one element of a wider planning balance. Measures are set out in the IDP to seek to make the site as sustainable as possible from a transport perspective.
<b>Policy ST1 (bullet 2)</b>	The Plan only encourages provision for cycleways. The Plan should stipulate cycleway provision and identify/safeguard routes.	Disagree. Sustainable transport improvements are an integral part of new development.
<b>Policy ST1 (bullet 2)</b>	Dunsfold Park – the bus services for this development are not deliverable without considerable public subsidy. (Dunsfold Parish Council)	The IDP requires appropriate bus services for Dunsfold Park to be provided in perpetuity to avoid the requirement for public subsidy.
<b>Policy ST1 (bullet 6)</b>	Suggested list of transport schemes for inclusion in SCC’s Local Transport Scheme 3	Noted. The list of transport schemes have been agreed with Surrey County Council.
<b>Policy ST1 (bullet 6)</b>	Request that Council is mindful of only being able to pool up to five S106 contributions.	Noted.
<b>Policy ST1 (bullet 6)</b>	New developments can make significant financial and other contributions towards sustainable transport improvement schemes through S106 Agreements and/or CIL. Development contributions are an important source of funding (and through land contributions) for local highway authorities.	Agreed.
<b>Policy ST1 (bullet 6)</b>	How can we ensure that developers pay the full cost of any transport schemes and continue to fund on going costs (e.g. public transport subsidies) once the development is complete?	Noted. This will be an integral part of deciding whether planning applications are acceptable.
<b>Policy ST1 (bullet 7)</b>	Air pollution and its contribution to premature deaths and disease has not been adequately assessed and	Disagree. Waverley Borough Council will continue to monitor air quality as part of its duty under the

## Chapter 7. Sustainable Transport

### Key stakeholders highlighted

	addressed in the Local Plan. (Cranleigh Civic Society)	Environment Act 1995.
<b>Policy ST1 (bullet 7)</b>	No mention of impact on Guildford Air Quality Management Area. (Cranleigh Civic Society)	Disagree. Guildford does not have an Air Quality Management Area.
<b>Policy ST1 (bullet 7)</b>	The Plan is not consistent with the Air Quality Action Plan. (Dunsfold Parish Council)	Disagree. Waverley Borough Council will continue to monitor air quality as part of its duty under the Environment Act 1995.
<b>Policy ST1 (bullet 9)</b>	Insufficient (on and off-street) existing car parking to accommodate additional demand (Cranleigh, Godalming)	Disagree. Public car parking provision is an important factor in controlling the level of car use, alongside other sustainable transport measures. As part of the assessment of planning applications, the provision of private and public car parking is an important consideration.
<b>Policy ST1 (bullet 9)</b>	New developments should provide sufficient car parking to prevent overspill parking or increased demand for existing car parking.	Agreed. As part of the assessment of planning applications, the provision of private and public car parking is an important consideration.



## Chapter 8. Infrastructure and Community Services

### Key stakeholders highlighted

Section/ paragraph no./Policy	Key Issues Raised	Council Response
Consultation	<p><b>Summary</b> Impact on local communities has not been done properly, research into effect on local communities and road users, all should be consulted prior to the local plan being put forward i.e. all Waverley residents.</p>	<p>Disagree The consultation process was open to all Waverley residents and the Council has received a very high number of representations from residents. The Council considers that adequate consultation has been carried out.</p>
Duty to Cooperate	<p>In relation to policy ICS1: Infrastructure and Community Services, we advocate the delivery mechanism of working with partners to identify issues and co-ordinate the delivery of infrastructure, including cross-boundary services, to ensure that there is sufficient infrastructure to support the anticipated level of development. East Hampshire will continue to advocate cross boundary working with regard to Whitehill and Bordon to ensure sufficient infrastructure provision (<i>East Hampshire District Council</i>)</p>	<p>Continuous cross-boundary working together is welcomed.</p>
Content - General	<p>No mention of how rail infrastructure can support the Local Plan for this area. The Foreword outlines the importance of infrastructure for the area but rail does not appear to be highlighted in the body of the document. (<i>Network Rail</i>)</p>	<p>The Local Plan document mentions the rail infrastructure and trains as much as it relates to existing capacity and use within the borough. However, the IDP captures a variety of issues relating to improvements to train facilities and interchange between train, bus and cycle use in the borough. There is also reference to improvements to the Portsmouth Direct Line to increase service frequency. Network Rail has not indicated any more improvement to railway infrastructure and train facilities within the borough.</p>
Paragraph 8.3; 8.4; 8.7	<p>8.3, 8.4 and 8.7 - support the inclusion of health in the infrastructure requirements linked to new developments.</p>	<p>Discussions are ongoing with Guildford and Waverley CCG.</p>

## Chapter 8. Infrastructure and Community Services

### Key stakeholders highlighted

	Would wish to engage further with the Council in relation to the impact of developments on health. The CCG would suggest that further specific discussion and provision for health care facilities and services would be required in order to support the proposals. ( <i>Guildford and Waverley CCG</i> )	
Paragraph 8.8	Local Plan paragraph 8.8 – currently states that in terms of CIL Habitats Regulations money "may" be top sliced from the Borough's Community Infrastructure Levy funds. This is not consistent with later paragraphs in the document where it is confirmed that this top slicing "will occur". Natural England recommend the word may is amended to 'will'. ( <i>Natural England</i> )	<i>Minor modification</i> - Differences in the use of words to be reconciled.
Paragraph of 8.15 and provision of Green Infrastructure	<b>SANG</b> - The policy as worded seeks to prioritise the provision of SANG over other infrastructure needs. The unintended consequences of this policy may result in insufficient infrastructure (such as education or transport infrastructure – both critical in Farnham) available to serve a development. SANG should not be prioritised over other infrastructure which is equally essential to the sustainable growth of Farnham.	Disagree Provision of SANG is a requirement to ensure that new development does not have an adverse impact on the Thames Basin Heaths Special Protection Area.
	<b>SANG</b> - We support Policy ICS1 as it is considered critical that the provision of SANG is prioritised to ensure that new development does not impact upon these important designations. ( <i>National Trust</i> )	Support welcome.
	Amend para. 8.15: "Along with physical and social infrastructure, <b>Green Infrastructure</b> ('GI') plays a key part in place-shaping. GI is a <b>conceptual</b> network of multi-functional open spaces, <b>designed and managed to best meet society's demands of its environment, underpinning quality of life issues but also</b>	Agree – Include as a <i>minor modification</i>

## Chapter 8. Infrastructure and Community Services

### Key stakeholders highlighted

	<p><b>supporting biodiversity. It will also be central in climate change adaptation by... and create <i>wildlife corridors</i> for the migration of species.”</b></p> <p>Policy ICS1: Infrastructure &amp; Community Services 2. “...the provision of SANG will be prioritised as items of essential <b>Green Infrastructure</b> to avoid...”</p>	
ICS1 – Contributions towards SANG & CIL	<p><b>Policy ICS1.</b> The SANG contribution should be identified completely separately from essential infrastructure contributions. SANG contributions are applicable with the determined zone around the Thames Basin Heaths SPA. Infrastructure contributions should be charged on a similar basis as the remaining areas of the Borough. If both infrastructure and SANG payments cannot be paid applications should be refused. (<i>Farnham Society</i>)</p>	<p>Disagree. Provision of SANG is dealt within the infrastructure policy because it is regarded as infrastructure.</p>
Policy Context – Provision of infrastructure - ICS1	<p>Paragraph 8.3 sets out a long list of infrastructure. The IDP contains no substance on how this infrastructure will be properly identified, its capital cost and how it would be funded and delivered.</p> <p>Policy ICS1 – Infrastructure and Community Facilities - Clause 5 says ‘Where delivery of development depends upon key infrastructure provision, ...development will be phased to ensure the timely delivery of the infrastructure necessary to serve it’ should be stronger, along the lines of; ‘The Council will resist granting permission for major strategic developments unless a firm, funded and suitably phased programme for delivery of necessary supporting infrastructure is scheduled, agreed and funded’.</p>	<p>Disagree The IDP lists the different infrastructure by area. The IDP is a living document which is being reviewed continuously even after the adoption of the Plan. Funding streams for delivering the needed infrastructure are being identified and substantially, the completion and continuing review of the IDP depends on a continuous collaboration with other stakeholders and infrastructure providers.</p> <p>Disagree – consider that the policy deals with this matter adequately.</p>

## Chapter 8. Infrastructure and Community Services

### Key stakeholders highlighted

	<p>Policy ICS1 is not sound as it is not positively prepared in seeking to meet objectively assessed infrastructure requirements.</p> <p>The IDP lists infrastructure improvements expected to be delivered over the plan period at Farnham: Farnham Town Centre Transport Package: measures to simplify the town centre road network to improve accessibility and journey time reliability for all modes of transport, reduce congestion, and improve air quality to address the AQMA 2017-2021. <i>(Farnham Town Council)</i></p>	<p>Disagree - Policy ICS1 provides the basis for the provision of the needed infrastructure as a consequence of proposed development during the Plan period, including air quality to address AQMA.</p> <p>The provision of essential infrastructure is fundamental to consideration of planning applications.</p>
	<p>1. Based on proposed new 4445 dwellings by 2032 and the spread of development around Farnham/Cranleigh areas our gas infrastructure may be significantly affected, particularly, SS4: Horsham Road Cranleigh development of 250 domestics is likely to have a significant impact on our gas infrastructure in this location. <i>(Southern Gas Networks)</i></p>	<p>Noted. No change. The Council will work with all infrastructure providers to ensure that, where necessary, developments are phased to provide time for infrastructure to be provided.</p>
	<p>The IDP contains a number of projects which have actually been completed or will have been completed by the time the Local Plan has entered into force.</p> <p>No prioritisation of the projects over the next 16 years. A key component of a sound Infrastructure Delivery Plan would be to set out how the proposed new settlement at Dunsfold Aerodrome, can be transformed over a 16 year period.</p> <p>There is insufficient detail in the Local Plan to ensure delivery of the essential basic new infrastructure before any of the new housing is occupied such as cycle</p>	<p>The IDP is a 'living' document which is continuously being updated to show outstanding projects. Some of the completed projects are being captured and the next iteration of the Plan will be an update of the current version. The implementation section of the Plan along with the trajectory will show how the development in the Plan will be delivered.</p>

## Chapter 8. Infrastructure and Community Services

### Key stakeholders highlighted

	<p>networks and bus network improvements as well as improvements to the A281. <i>(Dunsfold Parish Council)</i></p>	
	<p>Feel the transport network will require enhancements to deal with more residents and more traffic. With this in mind we would be seeking WBC to seek payments from land owners and house builders to deal with these specific local infrastructure requirements some of which are present now. Further residential or commercial development will only lead to the problem being exacerbated. The burden of these enhancements should lie with the land owners / developers of any proposed housing / commercial scheme – <i>(Witley Neighbourhood Plan Group)</i>.</p>	<p>The planning system has a defined approach of getting funds from development to support infrastructure provision. This approach includes S106; CIL; grants, etc. All these possible sources of funds are being considered in the Plan.</p>
	<p>Supports Policy ICS1 with the caveat that the words "...or Neighbourhood Plans..." should be inserted at the end of the first sentence of paragraph 4, i.e. it should read, "The Council will support the development of new services and facilities where required and may safeguard land for infrastructure if identified through the Infrastructure Delivery Plan or Neighbourhood Plans." <i>(Godalming Town Council)</i></p>	<p>Disagree All required infrastructure within the Borough is included in the IDP. The Neighbourhood Plan is part of the Development Plan for the Borough so its contents, including infrastructure needs, are adequately covered in the IDP.</p>
	<p>Housing needs should not take place without addressing the infrastructure needs, and not just transport but also water supply and sewerage. Cranleigh and Alfold in particular (where there is no Green Belt) have suffered with planning applications. They both suffer from both sewerage capacity and difficult flooding issues, and their traffic feed into the same road networks both, and outside, Guildford. There is evidence that there is not adequate water supply and sewerage capacity, that effluent levels cannot comply with the WFD and that no provision has been made for the ephemeral nature and unbelievable flow of Cranleigh Waters (into which effluent is discharged from</p>	<p>The Council is actively working with all infrastructure providers to ensure that the infrastructure needed for the growth outlined in the Plan is provided. Work on the Water Cycle Study is underway with liaison with the Environment Agency.</p> <p>The IDP is a living document and will be updated accordingly with the continuing engagement of infrastructure providers.</p>

## Chapter 8. Infrastructure and Community Services

### Key stakeholders highlighted

	<p>Cranleigh Sewage Works). The Council may well need to carry out additional water quality modelling and investigation to support all of the development cumulatively to identify whether there would be a deteriorating risk to Cranleigh Waters as a result of growth alone. This will need to be set out in the Local Plan, with appropriate evidence and conclusions of a Water Cycle Study.</p>	
	<p>The IDP lists various infrastructure improvements expected to be delivered over the plan period at Cranleigh but omitted the upgrading of the sewage treatment facility as a matter of urgent priority. <i>(Cranleigh Parish Council)</i></p>	<p>There are on-going discussions with Thames Water regarding the provision and upgrading of sewerage treatment works (STWs). The outcomes of these discussions will be used to update the IDP.</p>
	<p>Chapter 8 - This policy shows new infrastructure required is across the areas of other authorities, which will make the Local Plan more difficult to deliver - <i>(Dunsfold Parish Council)</i></p>	<p>The planning system provides for local authorities to work together across boundaries to deliver infrastructure that will impact beyond a local authority boundary. The Council is actively working with infrastructure providers to ensure delivery of required infrastructure.</p>
	<p>Thames Water supports Policy ICS1 but consider that there should be a separate policy dealing with both 'water supply and wastewater infrastructure' as they are essential to all development – <i>(Thames Water Utilities)</i></p>	<p>Disagree – do not consider that a separate policy is required.</p>

## Chapter 8. Infrastructure and Community Services

### Key stakeholders highlighted

	<p>Southern Water is concerned that reference to contributions through planning conditions has been removed from ICS1. In accordance with Planning Policy Guidance Paragraph: 001 Reference ID: 21a-001-20140306, planning conditions are necessary to mitigate the adverse effects of the development. Where Southern Water requires a development to connect at the nearest point of adequate capacity, due to any lack of capacity in the immediate vicinity of the site, the means to secure this would be via planning condition.</p> <p><i>(Southern Water)</i></p>	<p>Agree – <i>Minor mod</i> to include reference to use of conditions.</p>
	<p>Strongly support ICS1 <i>(Elstead Parish Council)</i></p>	<p>Support welcome</p>
Water Cycle Study	<p>Paragraphs 8.16 to 8.18 - Until the conclusions of the outstanding/ongoing evidence (including your Water Quality Assessment) is known, it is uncertain how justified, effective or consistent with national planning policy your local plan will be at delivering the required development in the most appropriate locations without adversely impacting surface or groundwater quality. It is important to distinguish between the volumetric capacities of a sewage system or treatment works (STW) and the environmental capacity –</p> <p><i>(Environment Agency)</i></p>	<p>The Council has commissioned further work on the Water Cycle Study to ensure the outcomes meet with the Environment Agency (EA) requirements. The EA is actively involved in this further work.</p>
	<p>Wastewater/sewage treatment capacity maybe a constraint in some catchments within the Waverley area. As the Water Cycle Study progresses and the Local Plan is finalised we will be reviewing which of our treatment sites need upgrades to accommodate the growth. We will continue to work with the Council on the Water Cycle</p>	<p>The Council has commissioned further work on the Water Cycle Study to ensure the outcomes meet with the Environment Agency requirements. The EA is actively involved in this further work. The offer of collaboration is welcome.</p>

## Chapter 8. Infrastructure and Community Services

### Key stakeholders highlighted

	Study. <i>Thames Water Utilities</i>	
Education and Health Facilities	<p>Infrastructure Position – Cranleigh, page 15 The Cranleigh area sections refers to 'New Cranleigh Primary School'. However this is a relocated school with a larger capacity. A new school would need to go through the free school process, whereas this is exempt as an existing school that is relocating.</p> <p>Glebelands is mentioned in the Cranleigh section. The expansion of Glebelands mainly relates to Dunsfold and no mention of how secondary provision would be met in the Dunsfold section.</p> <p>Infrastructure Position – Dunsfold Aerodrome, page 17 in the section on Dunsfold (and also in the Transport section and in the Infrastructure Schedule table), the reference to the new bus service to Dunsfold mentions the need for bus links to Guildford. This should also include bus links to Cranleigh which are an essential requirement to enable travel to secondary school. <i>(Surrey CC)</i></p>	The Council is actively engaged in continuing discussions with Surrey County Council, providers of education facilities and with the Guildford and Waverley Clinical Commissioning Group on health facilities for the growth proposed in the Plan. The IDP will be updated with the outcomes from the discussions.



## Chapter 8. Infrastructure and Community Services

### Key stakeholders highlighted

	<p>Concerned about the assessment of need with regarding health and education. Local Secondary schools close to capacity and yet no consideration has been given to where the pupils from the proposed schools on the Dunsfold site would go for secondary education and 6th form facilities.</p> <p>With regard to health it is important that the Guildford and Waverley Clinical Commissioning Group is consulted for both primary care and acute hospital care. With an ageing population, provision must include suitable care and nursing homes.</p> <p>The GP system is already under considerable strain. <i>(Wonersh Parish Council)</i></p>	<p>The council is actively engaged in continuing discussions with Surrey County Council, providers of education facilities and with the Guildford and Waverley Clinical Commissioning Group on health facilities for the growth proposed in the plan. The IDP will be updated with the outcomes from the discussions.</p>
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## Chapter 9 – Affordable Housing and Other Housing Needs

Key stakeholders highlighted in yellow

Section/ paragraph no./Policy	Key Issues Raised	Council Response
<p><b>Policy AHN1</b> Affordable Housing on Development Sites</p>	<p><b>General support for ‘Policy: AHN1’</b></p> <p><i>(Enterprise M3, 866); (Mark and Susan Bayley, 1048); (A2 Dominion Developments, 1155); (Elstead Parish Council and Elstead and Weyburn Neighbourhood Plan Steering Group, 1201)</i></p>	<p>Support welcomed.</p>
<p><b>Policy AHN1</b> Affordable Housing on Development Sites</p>	<p><b>Affordable housing: 30% min. provision [Opposed]</b></p> <ul style="list-style-type: none"> <li>• Needs to be uplifted.</li> <li>• Concern about viability.</li> <li>• Term ‘minimum’ unclear; should express a target.</li> <li>• One suggestion of 60-70% min. provision.</li> <li>• Increase the housing target                             <ul style="list-style-type: none"> <li>○ The plan fails to meet the objectively assessed need for affordable housing</li> <li>○ Affordable housing needs ought to be met in full.</li> </ul> </li> </ul> <p><i>(Home Builders Federation, 897); (Cove Construction, 72, 73, 570, 572); (Steve Williams, 719); (T.E Whittall, 94); (Campaign to Protect Rural England, 553); (Waverley Liberal, 585); (Godalming Town Council, 1140); (Thakeham Homes, 921); (Oakford Homes, 952); (Bewley Homes and Catesby Estates Ltd, 1109); (Michael Conoley Associates, 984); Farnham Estates (1360).</i></p>	<p>Disagree. Paragraphs 9.11 to 9.15 set out that the reason why the policy sets out the minimum provision of affordable housing is set at 30% as it is the right balance between need, viability and contributing to the creation of sustainable communities.</p> <p>The use of the word “minimum” is used because the Council would not oppose more than 30% given affordable housing. The affordable housing policy in the adopted Local Plan requires a minimum.</p> <p>The viability assessment uses assumptions that are realistic at the time evidence is gathered. The Policy is not prescriptive as it aims to allow for a change in circumstances should the need arise.</p> <p>The Council considers that it is not appropriate to set a local plan target for new housing to ensure that the 314 new affordable homes needed a year are delivered. There are a number of reasons for this. These are set out in the West Surrey Strategic Housing Market Assessment (SHMA).</p>
<p><b>Policy AHN1</b></p>	<p><b>Affordable housing: 30% min. provision</b></p>	<p>Support welcomed.</p>

## Chapter 9 – Affordable Housing and Other Housing Needs

Key stakeholders highlighted in yellow

<p>Affordable Housing on Development Sites</p>	<p><b>[Supported]</b></p> <ul style="list-style-type: none"> <li>• General support stated.</li> </ul> <p><i>(Peter Dunt, 212); (Tetlow King Planning, 556).</i></p>	
<p><b>Policy AHN1</b> Affordable Housing on Development Sites</p>	<p><b>Financial Contributions - commuted payments</b></p> <ul style="list-style-type: none"> <li>• Inconsistent with NPPF Guidance.</li> <li>• Remove reference to financial contributions.</li> <li>• Sites below 11 will lose out.</li> </ul> <p><i>(Bargate Homes Ltd, 1013); (Oakford Homes, 952); (Godalming Town Council, 1140); (Michael Conoley Associates, 984); (Home Builders Federation, 897).</i></p>	<p>Disagree. The policy is in accordance with NPPG on planning obligations. However, to make it clearer amended wording is needed.</p> <p><i>“On developments <b>in rural areas</b> where the net number of dwellings is fewer than 11 dwellings, the contribution may be in the form of a <b>cash payment financial contribution equivalent to...</b></i>”</p>
<p><b>Policy AHN1</b> Affordable Housing on Development Sites</p>	<p><b>Farnham Neighbourhood Plan</b></p> <ul style="list-style-type: none"> <li>• Farnham NP allocating sites as such low density that viability potentially undermines deliverability.</li> <li>• Tension between different policy aspirations between the Farnham NP and the LPP1.</li> <li>• The policy should make specific reference to viability, as recognised at paragraph 9.20 of the supporting text to Policy AHN1.</li> </ul> <p><i>(Signet Planning, 1047)</i></p>	<p>Disagree. The policy is set out in Local Plan Part 1 as it is a strategic policy. Therefore, Local Plan Part 2 or neighbourhood plans will need to accord with this unless there is clear justification that a different amount should be sought.</p> <p>The viability assessment uses assumptions that are realistic at the time evidence is gathered. The policy is not prescriptive as it aims to allow for a change in circumstances should the need arise.</p>
<p><b>Policy AHN1</b> Affordable Housing on Development Sites</p>	<p><b>Housing mix/viability</b></p> <ul style="list-style-type: none"> <li>• Higher densities sought to accommodate demand.</li> <li>• The tenure split should reflect the split modelled in the Viability Assessment.</li> <li>• Should reflect pattern of development in area, not just the West Surrey SHMA.</li> <li>• Provide indications of the split of affordable housing.</li> </ul>	<p>Disagree. Character and density considerations are dealt with in Local Plan Part 1 Policy TD1: Townscape and Design, stating that these considerations are protected by ensuring design responds to the distinctive local character of the area in which it is located.</p> <p>The Viability Study has to make certain assumptions in order to model viability. Although they are based on existing circumstances, in some cases they will</p>

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	<ul style="list-style-type: none"> <li>Flexibility to adjust quantum and tenure to reflect site circumstances.</li> <li>Developers should not be allowed to avoid their construction by making any form of financial contribution.</li> </ul> <p><i>(Jolyon Culbertson, 690); (Home Builders Federation, 897); (Michael Conoley Associates, 984); (Chiddingfold Parish Council, 1218); (Rowen Properties (London) Limited, 1321); (Tetlow King Planning, 556); (A2 Dominion Developments, 1155); (MMC Developments Ltd, 934); (Owen, 1335); (University for the Creative Arts, 933); (T.E Whittall, 94).</i></p>	<p>not be the ones applied. The tenure mix modelled is considered the most realistic at the time of the study.</p> <p>Form and type of development are considered along with the West Surrey SHMA, as part of assessment of on-site provision.</p> <p>The Local Plan should not include a prescriptive approach to the type and size of housing to be provided on development sites.</p> <p>The provision of an off-site or financial contribution accords with national policy.</p>
<p><b>Policy AHN1</b> Affordable Housing on Development Sites</p>	<p><b>Affordable rent</b></p> <ul style="list-style-type: none"> <li>Affordable housing should be the form of affordable rent and on a priority basis within the locality.</li> </ul> <p><i>(Witley Neighbourhood Plan Steering Group, 856)</i></p>	<p>Disagree. Policy AHN1 does not prescribe specific types and tenure of affordable housing. It requires the tenure of affordable housing to reflect up to date evidence of need in order that is flexible to adapt to changing circumstances. It also needs to take into account Government policy advice as well as viability of development.</p>
<p><b>Policy AHN1</b> Affordable Housing on Development Sites</p>	<p><b>Deliverability of Affordable Housing</b></p> <ul style="list-style-type: none"> <li>Opportunity for development at Dunsfold to provide lower cost/shared ownership housing.</li> <li>Importance of affordable housing delivery through new development schemes.</li> </ul> <p><i>(Mark Taylor, 406); (Cove Construction, 65).</i></p>	<p>Comments have been noted.</p>
<p><b>Policy AHN1</b> Affordable Housing on Development Sites</p>	<p><b>Definition of Affordable Housing</b></p> <ul style="list-style-type: none"> <li>Query lack of definition of affordable housing.</li> </ul>	<p>Disagree. The definition of Affordable Housing is adequately defined in Annex 2 of the NPPF.</p>

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	<i>(Wonersh Parish, 1166)</i>	
<b>Policy AHN2</b> Rural Exception Sites	<b>General support for ‘Policy: AHN2’</b>  <i>(Dockenfield Parish Council, 1249)</i>	Support welcomed.
<b>Policy AHN2</b> Rural Exception Sites	<b>Policy is too vague [Oppose]</b> <ul style="list-style-type: none"> <li>• The word "some" in first sentence of the policy should be replaced with the word "any".</li> <li>• "Small scale" should be defined and suggest 6 or 8.</li> <li>• Environmental constraints should be referred to.</li> </ul> <i>(Elstead Parish Council and Elstead and Weyburn Neighbourhood Plan Steering Group, 1203)</i>	Disagree. The word ‘some’ is appropriate in Policy AHN2.  Development ‘small in scale’ refers to the <i>form</i> of the building in relation to its surroundings and is not in relation to the <i>quantity</i> of buildings.  Environmental constraints will be identified on a case by case basis as part of the development assessment process.
<b>Policy AHN2</b> Rural Exception Sites	<b>Use of the word of ‘village’</b> <ul style="list-style-type: none"> <li>• The term 'village' in Policy AHN2 (I) is too vague, and should be replaced by 'village or parish'.</li> </ul> <i>(Richard Young, 282)</i>	Disagree. The term "village" is appropriate in Policy ANH2 (i) as it is setting out the context for the size, setting, form and character of the housing development that comprises a rural exception rather than about housing need itself. A Parish may have different settlements with different characteristics.
<b>Policy AHN2</b> Rural Exception Sites	<b>Limiting development in rural villages</b> <ul style="list-style-type: none"> <li>• Policy conflicts between limiting development in rural villages and policies such as AHN2 to facilitate housing development which has a real connection to the local community.</li> </ul> <i>(Dunsfold Parish Council, 1293)</i>	Disagree. Where there is a genuine local need for affordable housing which can't be met in some other way, affordable housing may be permitted in rural exception sites. This policy has been successful in the past and will continue to respond to local needs.
<b>Policy AHN2</b> Rural Exception Sites	<b>Deliverability</b> <ul style="list-style-type: none"> <li>• Significant proportion of affordable homes on rural exception sites should be provided under shared ownership schemes.</li> <li>• Allow for rent to buy housing instead of open market delivery as this will improve scheme</li> </ul>	Disagree. Policy AHN2 does not prescribe specific types and tenure of affordable housing. It requires the tenure of affordable housing to reflect up to date evidence of need in order that is flexible to adapt to changing circumstances and the needs of the community that the Rural Exception Site is made

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	<p>viability.</p> <p><i>(Dunsfold Parish Council, 1292); (Tetlow King Planning, 569)</i></p>	<p>for. It also needs to take into account Government policy advice as well as viability of development. Market housing on rural exception sites can be allowed in accordance with para 54 of the NPPF.</p>
<p><b>Policy AHN2</b> Rural Exception Sites</p>	<p><b>Reference to Traveller Sites</b></p> <ul style="list-style-type: none"> <li>• Include a reference to travellers in accordance with the Government’s Planning Policy for Traveller Sites (PPTS).</li> </ul> <p><i>(Surrey Gypsy and Traveller Communities Forum, 881, Guildford Borough Council 811)</i></p>	<p>Agree. However, the policy on rural exception policy AHN2 relates to affordable housing as defined in the NPPF. It is not considered appropriate to set out a policy approach for travellers in this policy but in AHN4. Proposed modifications needed (one to explanatory text and another to Policy AHN4).</p>
<p><b>Policy AHN2</b> Rural Exception Sites</p>	<p><b>Protection of Green Belt</b></p> <ul style="list-style-type: none"> <li>• Do not allow exceptions on the Green Belt, OR</li> <li>• Surrey Hills AONB and/or the area designated as AGLV or countryside beyond the Green Belt.</li> <li>• Retain Policy H6 of the adopted Local Plan or incorporate into Policy the two conditions in Paragraph 9.24.</li> </ul> <p><i>(Christopher Budgen, 472); (Campaign to Protect Rural England, 553)</i></p>	<p>Disagree. The Local Plan serves to maintain and protect all those areas of the Green Belt that fulfil the purposes of the designation.</p> <p>Development in the Green Belt will be considered in accordance with advice in the NPPF.</p>
<p><b>Policy AHN3</b> Housing Types and Size</p>	<p><b>General support for ‘Policy: AHN3’</b></p> <p><i>(Farnham Town Council, 519); (Cranleigh Parish Council, 1064); (Bewley Homes And Catesby Estates Ltd, 1107); (Elstead Parish Council and Elstead and Weyburn Neighbourhood Plan Steering Group, 1205)</i></p>	<p>Support welcomed.</p>
<p><b>Policy AHN3</b> Housing Types and Size</p>	<p><b>Housing mix and viability</b></p> <ul style="list-style-type: none"> <li>• Refer to other material planning considerations that may affect the mix of dwellings proposed e.g. character of the area.</li> <li>• More specific requirements required, e.g.</li> </ul>	<p>Disagree. Paragraph 50 of the NPPF states that local plans should identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand.</p>

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	<p>'families with children' could mean a house of 2-5 beds.</p> <ul style="list-style-type: none"> <li>• Should include role for Neighbourhood Plans in influencing housing mix.</li> <li>• Provide indications of the split of affordable housing.</li> <li>• Reference 'emerging' tenures, e.g. Starter-Homes, Nursing Homes and Student Housing. (Revised NPPF Annex 2).</li> <li>• The words 'the locality and site circumstances' should be inserted after the words 'West Surrey Strategic Housing Market Assessment (SHMA)'.</li> <li>• Should emphasise the need for 2 and 3 bedroom dwellings as identified by the West Surrey SHMA.</li> <li>• Mix should be far closer to those delivered to the open market.             <ul style="list-style-type: none"> <li>○ Residents become older want to downsize which will release housing stock for families.</li> </ul> </li> </ul> <p><i>(Bargate Homes Limited, 1014); (Godalming Town Council, 1141); (A2 Dominion Developments, 1158); (University for the Creative Arts, 933); (Andrew Povey, 601); (Waverley Liberal, 585); (Cove Construction, 76, 573); (Guildford Borough Council, 820); (Bewley Homes And Catesby Estates Ltd, 1107); (Elstead Parish Council and Elstead and Weyburn Neighbourhood Plan Steering Group, 1205); (Signet Planning, 1049); (Notcutts Limited, 1300); (Dunsfold Parish Council, 1295)</i></p>	<p>The Council's policy is strategic and is deliberately flexible to allow for different types and sizes of homes to meet the need in different locations and to react to a change in circumstances. It is flexible enough to allow neighbourhood plans and Local Plan: Part 2 to set out more detailed requirements.</p>
<p><b>Policy AHN3</b> Housing Types and Size</p>	<p><b>Compliance with Building Regulations</b></p> <ul style="list-style-type: none"> <li>• The paragraph referring to compliance with</li> </ul>	<p>Disagree. The viability study has assumed that housing will meet Part M4 (2) of the Building</p>

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	<p>Part M4 (2) of the Building Regulations should be deleted from the policy.</p> <p><i>(Cove Construction, 573); (Bewley Homes And Catesby Estates Ltd, 1107); (Telow King Planning, 575).</i></p>	<p>Regulations. Although the study says that this will add approximately £1,500 per dwelling to the cost of development it does not indicate that it will affect viability. It is required under planning policy to ensure that new homes are built so that they can meet and adapt to the needs of all ages and abilities that have been identified in the supporting evidence.</p>
<p><b>Policy AHN4</b> Gypsies, Travellers and Travelling Showpeople Accommodation</p>	<p><b>General support for ‘Policy: AHN4’</b></p> <p><i>(Farnham Town Council, 519); (Cranleigh Parish Council, 1064); (Bewley Homes And Catesby Estates Ltd, 1107); (Elstead Parish Council and Elstead and Weyburn Neighbourhood Plan Steering Group, 1205)</i></p>	<p>Support welcomed.</p>
<p><b>Policy AHN4</b> Gypsies, Travellers and Travelling Showpeople Accommodation</p>	<p><b>Concern over growth</b></p> <ul style="list-style-type: none"> <li>Increase the size of existing sites in Hascombe area will dominate the rural community.</li> </ul> <p><i>(Hascombe District Council, 1258) (Alford District Council, 1280)</i></p>	<p>Disagree. The criteria for considering proposals or allocations set out in Policy AHN4 is to be applied sequentially. This means that if there is evidence that demonstrates that the higher order criterion can not be met then the next criterion in the sequence will be considered. This evidence could include the creation of large unsustainably located sites that are not appropriate for travellers or have a detrimental impact on the area and its amenities.</p>
<p><b>Policy AHN4</b> Gypsies, Travellers and Travelling Showpeople Accommodation</p>	<p><b>Cross-border collaboration on evidence base</b></p> <ul style="list-style-type: none"> <li>Traveller Accommodation Assessment (TAA) predates the Government’s Planning Policy for Traveller Sites (PPTS).</li> <li>Request for collaboration on updating the Traveller Accommodation Assessment (TAA) for Local Plan: Part 2.</li> <li>The Cunnane study is not evidence based and fails to explain what precisely the situation is at sites such as New Acres, Stovolds Hill.</li> </ul> <p><i>(Mole Valley District Council, 817) (Tandridge District</i></p>	<p>Waverley will continue to discuss cross boundary issues, including the provision of traveller accommodation, as part of the duty to cooperate.</p> <p>The Cunnane update to the TAA in 2016 was based on evidence available at the time. However, as part of the work for identifying and allocating sites for traveller accommodation in Part 2 of the Local Plan the Council will be looking to update evidence of need and supply of traveller accommodation in a new TAA.</p>



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<p><b>Policy AHN4</b> Gypsies, Travellers and Travelling Showpeople Accommodation</p>	<p><i>Council, 292); (Heine Planning, 19)</i></p> <p><b>Policy is too vague</b></p> <ul style="list-style-type: none"> <li>• Policy is too vague compared to general housing. <ul style="list-style-type: none"> <li>○ Does not refer to accommodation targets</li> <li>○ Only permits pitches if they meet need</li> <li>○ Leaves the delivery to Part 2 of which there is no timetable.</li> </ul> </li> <li>• Planning applications will be refused for traveller accommodation if identified need is met even if it is suitable in planning terms whereas other housing is not restricted on these grounds.</li> </ul> <p><i>(Guildford Borough Council, 813); (Surrey Gypsy and Traveller Communities Forum, 883)</i></p>	<p>The update to the TAA undertaken in 2016 shows that there is a need for traveller accommodation in the Local Plan period.</p> <p>However, the definition of traveller has changed as a result of the Planning Policy for Traveller Sites (PPTS). As such although the TAA was updated in 2016, it was based on the evidence TAA 2014. As part of the work for identifying and allocating sites for traveller accommodation in Part 2 of the Local Plan the Council will be looking to update evidence of need and supply of traveller accommodation in a new TAA using the new definition. This evidence will inform an up to date target for Part 2 of the Local Plan.</p> <p>It is considered appropriate to carry out the detailed allocation and identification of sites in Part 2 of the Local Plan.</p> <p>Agree. Proposed modification needed. The requirement that any permitted allocation or proposal for traveller accommodation has to be necessary to meet the needs is an unfair requirement in that this requirement is not imposed on bricks and mortar housing. It is considered that the first bullet of paragraph five of policy AHN4 should be removed.</p>
<p><b>Policy AHN4</b> Gypsies, Travellers and Travelling Showpeople Accommodation</p>	<p><b>Green Belt</b></p> <ul style="list-style-type: none"> <li>• If necessary the Council should consider removing land from the Green Belt to meet need, as in Guildford.</li> </ul> <p><i>(Heine Planning, 19)</i></p>	<p>Disagree. The update to the TAA undertaken in 2016 shows that there is a need for traveller accommodation in the plan period. However, as the identification and allocation of traveller sites is to be carried out in Part 2 of the Local Plan, the Council is not currently in a position to state whether it is necessary to remove land from the Green Belt to</p>

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		<p>meet need. Policy E of the PPTS states “subject to the best interests of the child, personal circumstances and unmet need are unlikely to clearly outweigh harm to the Green Belt and any other harm so as to establish very special circumstances”. If there is evidence that to meet traveller accommodation needs exceptionally requires Green Belt land then this will be considered in Part 2 of the Local Plan.</p>
<p><b>Policy AHN4</b> Gypsies, Travellers and Travelling Showpeople Accommodation</p>	<p><b>Deliverability</b></p> <ul style="list-style-type: none"> <li>• Policy needs to be more flexible to provide choice of sites and, in particular for new small family owned sites which can be owned and managed separate from existing sites.</li> <li>• Needs to be a min. figure with a 5% buffer to address the backlog.</li> <li>• There is a need to provide transit provision, especially if it is found that much has been displaced with residential pitches at New Acres.</li> <li>• Similar to the Policy in Guilford, large scale developments should have a compulsion to provide Traveller and Travelling Showpeople pitches / plots.</li> <li>• Intensification and extension of existing sites could result in large isolated sites with little integration and divided communities.</li> </ul> <p><i>(Heine Planning, 19); (Cilla Britton, 625); (Guildford Borough Council, 811)</i></p>	<p>Disagree. The update to the TAA undertaken in 2016 shows that there is a need for traveller accommodation in the plan period. However, it is considered appropriate to carry out the detailed allocation and identification of sites in Part 2 of the Local Plan. As part of this work, the Council will be looking to update the evidence of need and supply of traveller accommodation in a new TAA.</p> <p>The criteria for considering proposals or allocations set out in Policy AHN4 is to be applied sequentially. This means that if there is evidence that demonstrates that the higher order criterion can not be met then the next criterion in the sequence will be considered. This evidence could include the creation of large unsustainably located sites that are not appropriate for travellers or have a detrimental impact on the area and its amenities.</p>

## Chapter 10 – Employment and the Economy

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Section/ paragraph no./Policy	Key Issues Raised	Council Response
Policy EE1 Site Specific	Land at Water Lane, Farnham is allocated for development despite it being within an Area of Strategic Visual Importance (ASVI). As land at south of Monkton Lane has same policy designation the same approach should be applied to this site (Cove Construction 77,78)	Noted. Land at Water Lane has been allocated for employment use on the grounds that the land is already in operational use for sewage works and therefore will not have a significant impact on the visual amenities of the area particularly as the site is adjoined by the rest of the sewage works to the north west and the Farnham Trading estate to the south east.
Policy EE1 Amount of Employment land	Supports positive approach to meeting employment needs and protecting and enabling employment uses. However, employment needs have been assessed independently of Guildford and Woking that are within the same West Surrey Functional Economic Market Area (FEMA). Therefore it is difficult to determine if the employment land needs are being met across the FEMA (Rushmoor BC 131)	Disagree. Due to the different timescales for Local Plan preparation the evidence on employment needs for each authority within the FEMA has been assessed separately. However, this approach does not mean that there is a lack of evidence regarding the needs across the whole of the FEMA. Currently there is no issue regarding meeting unmet need which will be considered through the duty to co-operate.
Policy EE1 Dunsfold	Relying on Dunsfold for employment is unsound due to its unsustainable location for modern commerce and industrial and warehousing with poor accessibility/transport links. It is out of proportion to propose 39% of all employment floorspace at Dunsfold Aerodrome. The Sustainability Appraisal (SA) shows that employment growth is on the other side of the Borough. The ELR shows that there will be an excess of B1c/B2 and B8 floorspace. There is a need to cap the amount of B8 on strategic sites, particularly on Dunsfold Aerodrome which is inappropriate for B8 use. ( Cilla Britton 606, Richard Cooke 445, POW 361, Chris Britton 633, Concise Construction 650, Dr Hamill 653, Loxwood PC 835)	Disagree. Dunsfold is an existing employment site. Table 10.1 of the Local Plan shows the amount of employment floorspace assessed as needed in the ELR and the amount of floorspace that could potentially be supplied from existing employment sites. The 26,000 sq. m of employment floorspace proposed at Dunsfold therefore is 39% of the amount of floorspace assessed as having the potential to meet the amount of employment floorspace needed. It is not the contribution of Dunsfold to the total amount of land allocated in the Local Plan.
Policy EE1	The policy over provides for employment when there	Disagree. The Employment Land Review (ELR) is both

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<p>Amount of Employment Land – too much</p>	<p>is no proven demand. (John Pateman 466, Chris Britton 633, Columbia Threadneedle 1267) As there is a surplus of employment land there is no need for B8 land or there is a need to cap the amount of B8 on strategic sites (Cilla Britton 605).</p>	<p>a quantitative and qualitative assessment of employment land need. It uses the economic strategy aligned scenario for economic growth as it is considered the most realistic scenario for growth in the Borough. The quantitative assessment forecasts a surplus of B1c, B2 and B8 floorspace but a deficit of B1a/b floorspace. Although the surplus quantity of B1c, B2 and B8 floorspace is more than enough to meet the deficit in B1a/b floorspace in reality it might not be suitable for conversion. Therefore Policy EE1 prescribes additional B1a/b floorspace only. However, the qualitative assessment in the ELR has led to the conclusion that the local plan needs to be flexible to adapt to the changing needs of the economy as well as all to the needs of all businesses regardless of the employment type. This includes B8 use. Therefore a cap on additional employment land both in broad terms and for a specific B use type would be contrary to this flexible approach, onerous and could harm the economy.</p>
<p>Policy EE1 Amount of employment land – too little</p>	<p>Consider that the findings of the Employment Land Review that implies that the need for new employment development is weak and limited is based on flawed evidence on both need and supply. It is not sufficient to meet the needs of the economy, businesses and for the increase in the number of new homes being planned for the Borough (Cranleigh Chamber of Commerce 500, Witley Neighbourhood Plan Steering Group 857, Crownhall Estates 906)</p>	<p>Disagree. The ELR is both a quantitative and qualitative assessment of employment land need. It uses the economic strategy aligned scenario for economic growth as it is considered the most realistic scenario for growth in the Borough. The quantitative assessment forecasts a surplus of B1c, B2 and B8 floorspace but a deficit of B1a/b floorspace. Although the surplus quantity of B1c, B2 and B8 floorspace is more than enough to meet the deficit in B1a/b floorspace in reality it might not be suitable for conversion. Therefore Policy EE1 prescribes additional B1a/b floorspace only. However, the qualitative assessment in the ELR has led to the conclusion that the local plan needs to be flexible to adapt to the changing needs of the economy as well as all to the needs of all businesses regardless of the employment</p>

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		type which means taking a positive approach to employment development.
Policy EE1 Site specific	Support the allocation of Water Lane but should not be restricted to B1a/b as it will conflict with the NPPF or the Neighbourhood Plan as well as Policy SS9 of the Local Plan that has not restrictions on the B use type (Farnham TC 520)	Disagree. Policy EE1 plans for employment development that includes at least 16,000 sq. m of B1a/b floorspace. Therefore, it does not restrict development on Water Lane specifically for that use.
Policy EE1 Amount of Employment Land	Support the confirmation that Waverley, Guildford and Woking comprise the West Surrey FEMA and welcome ongoing cooperation that the Local plan will meet all its objectively assessed employment needs. Support Waverley meeting its employment needs as Guildford has no capacity to meet any unmet need within the FEMA (Guildford BC 823)	Support welcomed
Policy EE1 Amount of Employment Land – too little	Concerned about the lack of response to Experian employment land forecasting model signifying need for B8 land, especially logistics.(Enterprise M3 LEP 865)	Disagree. The ELR does consider Experian forecasts. However, because of the way Experian forecasts are produced they do not necessarily reflect what is actually happening at the local level and therefore is not the preferred scenario for planning for economic growth. The Experian projections are not realistic for Waverley and this is clearly illustrated in how different Experian's projections are to Waverley's historical growth levels and the trend based projections. Coming up with a preferred scenario is both a theoretical exercise and an understanding of the local area. NPPG states that plan makers can use needs assessment methodology that is appropriate to their circumstances, explaining why their particular local circumstances have led them to adopt a different approach where this is the case. The ELR sets out the justification.
Policy EE1 Amount of Employment Land – too little	Policy is based on flawed evidence in which the need for employment land has been suppressed because a higher level would mean more housing would be required that the Council does not wish to	Disagree. The ELR considers that the Economic Strategy aligned scenario is the most realistic scenario of economic growth for Waverley. This is because it reflects what is actually happening at the local level.

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	provide for (Crownhall Estates 907).	Furthermore, the level of B class employment growth that results from this scenario is actually higher than the trend based scenario. Coming up with a preferred scenario is both a theoretical exercise and an understanding of the local area. NPPG states that plan makers can use needs assessment methodology that is appropriate to their circumstances, explaining why their particular local circumstances have led them to adopt a different approach where this is the case. The ELR sets out the justification.
Policy EE1 Tourism	Policy is unsound and fails to support other commercial development such as hotels which would offer employment opportunities and support the Borough's tourism trade. Site south of Badshot Lea could provide a new hotel (Rowen Properties 1323).	Disagree. Policy EE1 states that development for economic growth will be delivered through making provision for accommodation for visitors to the Borough in part e) of the policy. Site specific allocations will be undertaken under Part Two of the Local Plan.
Policy EE1 Tourism	Policy does not give specific direction for tourism apart from allowing for accommodation. Disappointing not to see tourism emphasised in this section. Waverley could do more to encourage and promote its cultural heritage. Insert clause to say that opportunities for tourism will be actively promoted (Farnham Theatre Association 1089)	Disagree. There is a direct link between tourism, recreation, leisure and culture. The Local Plan deals with the latter in Chapter 12 and therefore does not need to do this in the tourism chapter.
Policy EE1 Rural Employment	There is no encouragement or a coherent approach to employment and to smaller business in the rural parishes There is nowhere for business run from home to expand. The priority of new employment development should be on brownfield land and for local need. More employment sites should be allocated to increase competition and ensure that sites will be delivered to meet need. There is no support for horticulture or agriculture. (Witley Neighbourhood Plan Steering Group 857, Chiddingfold PC 1221) There is nowhere in the plan	Disagree. The qualitative assessment in the ELR has led to the conclusion that the local plan needs to be flexible to adapt to the changing needs of the economy as well as businesses including small and medium sized enterprises (SME). The policy reflects this evidence and seeks to be positive about employment development including permitting development within all defined settlements; redeveloping, intensifying or expanding existing employment sites and reusing existing rural buildings. This is considered to sufficiently cater for the needs of rural businesses balanced with a

## Chapter 10 – Employment and the Economy

Key stakeholders highlighted in yellow

	that would allow the Notcutts garden centre at Cranleigh to expand, intensify or upgrade its existing facilities – contrary to the NPPF. No reference to encouraging the reuse of sustainable rural employment sites, e.g. surplus land at Notcutts garden centre which could be used for low-key employment generating or start-up units within Green belt. (Notcutts Ltd 1301/1309).	need to protect environmental designations and the character of the Borough including the Green Belt.
Policy EE2 Permitted Development	The protection of employment sites is contrary to the loss of employment use to residential that can be carried out under permitted development and this should be made clear (Haslemere TC 480, Michael Conoley 985)	Disagree. The ELR demonstrates that there is a need to protect existing employment sites as part of the flexible approach to meet the needs of the economy and of businesses over the plan period. As employment uses can be lost under permitted development there is stronger justification to protect employment uses where the legislation allows the Council to control development. The Local Plan does not over ride legislation and therefore there is no need to make this point explicit.
Policy EE2 Support – Neighbourhood Plan	The protection of existing employment sites unless there is no reasonable prospect of the site being used for employment sites is supported. Farnham Neighbourhood Plan designates the sites to be retained in Farnham (Farnham TC 521)	Support welcomed.
Policy EE2 Clarity of policy	Policy requires additional wording so that paragraph 10.33 states that if sufficient evidence is provided to justify the loss of part of an allocated site then this would be considered acceptable (MMC Developments 965)	Disagree. The wording in the policy and relevant paragraph does not preclude land or premises that only forms a part of a larger employment site being considered.
Policy EE2 Weyburn Works	Support policy (Mark and Susan Bayley 1050, Godalming TC 1142) Strongly supported, particularly in relation to Tanshire/Weyburn Works (Elstead PC and Elstead Neighbourhood Plan Steering Group	Support welcomed. However Policy EE2 is worded to accord with the NPPF and to be sufficiently flexible to allow for a change of use subject to appropriate evidence. On these grounds the Waverley 2016 Land

## Chapter 10 – Employment and the Economy

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	1207, Peper Harow PC 1237)	Availability Assessment (LAA) has assessed Weyburn Works as having the potential for 70 dwellings but caveats this assessment by saying that the Council will need to be satisfied that the site is no longer needed for employment.
Policy EE2 Neighbourhood Plan	The policy has implications for the Cranleigh Neighbourhood Plan as some sites in ELR, e.g. Hewitt's Industrial Estate, have more suitable alternative use to employment and have been put forward under the Cranleigh NDP for housing. (Cranleigh PC 1065)	Disagree. The ELR concludes that given the need for employment floorspace in the Borough, existing sites should be protected from alternative use. Policy EE2 is sufficiently flexible to allow for a change of use subject to appropriate evidence.
Policy EE2 Too restrictive	Policy wording is too restrictive in that NPPF Para 51 is more positive about employment changing to residential where there is an identified need for housing in that area provided that there are not strong economic reasons not to.(Crownhall Estates 907).	Disagree. The Council considers that the evidence in the ELR demonstrates that there are strong economic reasons to protect existing employment sites. The qualitative assessment in the ELR has led to the conclusion that the local plan needs to be flexible to adapt to the changing needs of the economy as well as businesses including SMEs. Policy EE1 reflects this evidence and seeks to be positive about employment development in which Policy EE2 supports this approach. If the Council did not seek to protect its existing employment sites then the approach in Policy EE1 would be weakened. Policy EE2 does allow for evidence to be presented demonstrating that there is no reasonable prospect of the site being used for employment use in line with the NPPF.
Policy EE2 Clarity of Policy	Support protecting existing employment sites employment sites outside designated strategic employment sites in (Royal Mail Group 652, MMC Developments)	Disagree. Policy seeks to protect all sites in existing employment use. It states that these <i>include</i> sites specifically identified in adopted Waverley Local Plan 2002.
Policy EE2 Clarity of Policy	Consider additional wording to protect Royal Mail properties (Royal Mail Group 652)	Listing the specific needs of individual employers is a detailed matter rather than a strategic matter.
Policy EE2 Clarity of Policy	Final paragraph of EE2 of The Local Plan should be amended to acknowledge waste management uses	Agree. Waste management uses should be considered as a viable use that could replace employment uses



## Chapter 10 – Employment and the Economy

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	can be located in modern, purpose-designed buildings within industrial estate by stating that Policy WD2 of the Surrey Waste Plan 2008 or its successor policies will be taken into account (Surrey County Council 834)	where it has been demonstrated that it loss is appropriate. Add to final paragraph of Policy EE2 .....and the provisions of Policy WD2 of the Surrey Waste Plan 2008 or equivalent adopted policies in a New Surrey Waste Plan 2018-2033
Policy EE2 Marketing evidence	Accepts the justification for unused employment land to be used for housing but suggests striking a balance between need for housing and employment. The recent Commercial Property Market Study (2016) highlights an increasing need in Guildford Market area for high quality employment and industrial space. Supportive of policy but recommends a thorough market assessment including current demand and future projections be carried out before any employment sites being redeveloped for residential use. (Enterprise M3 LEP 865)	Disagree. Policy 10.33 of the Local Plan sets out some of the evidence that Waverley would require to assess application for loss of employment land or premises and this is considered appropriate. This is based on recommendations in the 2009 ELR and is comprehensive but not exhaustive. It is also not prescribed to ensure that the Council can be flexible to adapt its requirements to changing market circumstances.
Employment	Need to ensure that allocations for residential development consider any detrimental impact that existing Royal Mail operations may cause to neighbouring sites (Royal Mail Group 652)	Details of mitigating externalities from neighbouring uses will be set out in detail in Part 2 of the Local Plan, Neighbourhood Plans and planning applications.
Employment	LEP should be Local Enterprise Partnership, not Local Economic Partnership .(Enterprise M3 LEP 869)	Agree. Replace all <del>Local Economic Partnership</del> with <b>Local Enterprise Partnership</b>
Employment/10.29	Want recognition of the school and its planned future development included in proposed Change to para 10.29. (Charterhouse School 922)	Disagree. The chapter relates to both employment and tourism. Although schools are a major employer in the Borough, educational needs and the development to meet this is set out in Chapter 8 on infrastructure and community services. Listing the specific needs of individual employers is a detailed matter rather than a strategic matter.
Para 10.28	It is disingenuous for the Local Plan to state that	Disagree. Part 1 of the Local Plan sets out the strategy

## Chapter 10 – Employment and the Economy

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	employment will be focused in the main settlements when it does not make it clear where in Godalming that development will go (Godalming TC 1142)	for development. It is therefore appropriate to state broadly where employment development will go and leave the details of specific locations to Part 2 of the Local Plan or respective neighbourhood plans.
Para 10.23	The Plan should remove the inconsistency in which under the paragraph the annual wings and wheels show is mentioned at Dunsfold, yet it allocates the site for development which will destroy this annual event (POW 1298).	Disagree. It is reasonable to refer to existing activities such as Wings and Wheels.

## Chapter 11. Town Centres and Shopping

### Key stakeholders highlighted

Section/ paragraph no./Policy	Key Issues Raised	Council Response
Paragraph 11.19	Support the recognition of Farnham Design Statement and Neighbourhood Plan as sound. (Farnham TC)	Support welcomed
Paragraph 11.31	Support the recognition of Cranleigh Design Statement 2008 (SPD) and Neighbourhood Plan as sound. (Cranleigh PC)	Support welcomed
Waverley's Town Centres	Evidence has identified the need for retail floorspace in order to maintain constant market share. It would be helpful if greater clarity is provided on the scale of retail development to be delivered in the main centres to meet these needs. (Rushmoor BC)	Disagree. Paragraphs 11.18, 11.22, 11.26 and 11.30 provide floorspace requirements for convenience and comparison floorspace in Farnham, Godalming, Haslemere and Cranleigh respectively, as indicated in the latest Town Centre Study. It is considered that this is an acceptable level of detail for Local Plan Part 1.
Policy TCS1 Town Centres	Should seek to have a strong influence on traffic management within town centres.	Not agreed. The issue of town centre traffic is identified, however detailed management is an issue for the Highways Authority and for consideration through the development management process.
Policy TCS1 Town Centres	Support priority given to Town Centres but object to the omission of Farnham (or any other centres) from being named in the Policy as unsound because the most appropriate strategy is insufficiently clear. (Farnham TC)	Agreed. Amendment to be made to include all town centres by name.
Policy TCS1 Town Centres	Support the priority given to Town Centres and measures to improve Cranleigh village centre. (Cranleigh PC)	Support welcomed.
Policy TCS1 Town Centres	Policy TCS1 is sound and it is good to see that at paragraph 5 cultural uses are included. (Farnham Theatre Association)	Support welcomed.
Policy TCS1 Town Centres	Policy should contain actions to retain smaller shops	Not agreed. The smaller shops do give Waverley's

## Chapter 11. Town Centres and Shopping

### Key stakeholders highlighted

	and to address the visual look of the town centres through greening in new and existing spaces	towns their character, but the Use Classes Order dictates the uses that can change and this does not include preventing changes of ownership. Greening of the towns in the manner suggested is not an issue for the Local Plan.
<b>Policy TCS1 Town Centres</b>	Support Policy TCS1 (Town Centres). ( Godalming TC)	Support welcomed.
<b>Policy TCS2 Local Centres</b>	Support Policy TCS2 for Local Centres, however the congestion on the A281 if Dunsfold Park is developed will damage the vitality and viability of Bramley. This will therefore contravene the policy. (Bramley PC)	Disagree – see responses elsewhere regarding the potential impact of the Dunsfold Aerodrome development and associated mitigation.
<b>Policy TCS2 Local Centres</b>	Support Policy TCS2 (Town Centres). ( Godalming TC)	Support welcomed.
<b>Policy TCS3 Neighbourhood and Village Shops</b>	Support Policy TCS3 as sound. It reinforces Neighbourhood Plan Policy FNP24 which defines the neighbourhood centres to be retained within Farnham. (Farnham TC)	Support welcomed.
<b>Policy TCS3 Neighbourhood and Village Shops</b>	Only concerned with protecting existing shops and services. Suggest expanding the policy to encourage provision of new small-scale shops. (Thakeham Homes)	Agreed in part. Amend policy to include support for new neighbourhood and village shops.
<b>Policy TCS3 Neighbourhood and Village Shops</b>	This section of the plan refers specifically to shops. Public Houses are considered as community facilities and are specifically referred to in the list of these in para 8.2. Resistance to the loss of key services and facilities in contained within Policy ICS1. The test for viability could be contained in Local Plan Part 2. (CAMRA)	Not agreed. Protection for public houses and other community facilities are referred to in Policy ICS1.

## Chapter 11. Town Centres and Shopping

### Key stakeholders highlighted

<b>Policy TCS3 Neighbourhood and Village Shops</b>	Strongly support Policy TCS2 and TCS3 (Wonersh PC)	Support welcomed.
<b>Policy TCS3 Neighbourhood and Village Shops</b>	Strongly support Policy TCS3 (Wonersh PC)	Support welcomed.

## Chapter 12. Leisure, Recreation and Culture

Key Stakeholders highlighted.

Section/ paragraph no./Policy	Key Issues Raised	Council Response
<b>General comment</b>	Welcomes approach to deliver the 'right level of housing in the right places and in accessible locations' to help achieve 'health and wellbeing objectives'. (Surrey County Council)	Support welcomed.
<b>Provision in Waverley</b>	Pleased the plan recognises the importance of safeguarding cultural facilities as directed by the NPPF. (Theatres Trust)	Support welcomed.
<b>Provision in Waverley</b> Paragraph 12.9	Old Park, Farnham should be acknowledged in the Local Plan as an area of historic interest, sensitive landscape, setting for listed buildings, recreational value and bio diverse habitats as in the Farnham Neighbourhood Plan.  Ask that more stringent protection be provided in the Local Plan.	Not accepted. This designation is not made by the Council. Old Park was not included in the original listing of Farnham Park as an Area of Historic Landscape Value when originally designated by English Heritage (now Historic England). It is protected as Countryside beyond the Green Belt and as an Area of Great Landscape Value.
<b>Provision in Waverley</b> Paragraph 12.9	Mention might be made here of the Borough's formal nature reserves, both national and local. (Surrey Wildlife Trust and Surrey Nature Partnership)	Agreed. Additional factual information to be included.
<b>Provision in Waverley</b> Paragraph 12.12	Concerned by statement in para 12.12. NPPF decides the detailed criteria for designating local green spaces; this is not for WBC to interpret. (Godalming TC)	Agreed. The NPPF does not provide guidance with any great detail for Local Plans or Neighbourhood Plans to use to designate local green spaces. Council would wish to provide some guidelines based on the NPPF to help Neighbourhood Plans to formulate evidence to support candidate local green space areas. Amend wording in para 12.12 to reflect this.
<b>Delivery after Policy LRC1</b>	Under the 'Delivery' section add a clause about improving access to the natural environment, and clarifying partnership organisations.	Agreed. Amend second bullet point to aid clarity and accuracy.

## Chapter 12. Leisure, Recreation and Culture

### Key Stakeholders highlighted.

<p><b>Policy LRC1</b></p>	<p>Reword Policy LRC1 to include specific reference to parks and gardens, allotments and amenity space. (Farnham TC and Farnham Society and Rowen Properties)</p>	<p>Not agreed. Evidence at the time that the PPG17 Study was undertaken showed that Waverley was well catered for in parks and gardens, allotments and amenity space, as well as having access to a large extent of natural and semi natural greenspace across the borough. Recent specific evidence documents (Pitch Strategy and Play Space Strategy) do show a calculated need for the provision of play space and formal pitches. The last paragraph of the policy does refer to encouraging the need for new open space, sports, leisure and recreation facilities and promoting outdoor recreation and access to the countryside and it is felt that that this statement encompasses all types of space as identified in the various listed evidence study documents.</p>
<p><b>Policy LRC1</b></p>	<p>Recommend at Paragraph 12.25 the inclusion of the word 'cultural' in the final sentence of the Policy description. (Farnham Theatre Association).</p>	<p>Agreed. Amendment to be made.</p>
<p><b>Policy LRC1</b></p>	<p>Suggest inclusion of additional points; - provision support to Haslemere Educational Museum - improvement to sporting facilities in villages such as Chiddingfold -finance for upgrading Chiddingfold amenities -support for community initiatives.</p>	<p>Not agreed. These are not matters for the Local Plan.</p>
<p><b>Policy LRC1</b></p>	<p>Recommend adding in that any re-provision needs to be in a location accessible to the community it serves. (Godalming TC)</p>	<p>Agree – wording of policy and/or text to be amended accordingly.</p>
<p><b>Policy LRC1</b></p>	<p>Strongly support Policy LRC1. (Elstead PC and Elstead and Weyburn Neighbourhood Plan Steering Group)</p>	<p>Support welcomed.</p>
<p><b>Policy LRC1</b></p>	<p>Whilst there is broad support for the retention of leisure facilities in policy LRC1 than before (which is</p>	<p>Not agreed. The last paragraph of the policy states that the council will encourage the provision of new facilities</p>

## Chapter 12. Leisure, Recreation and Culture

Key Stakeholders highlighted.

	supported), the policy does not include the support for the provision of new or enhanced services referred to in Objective 5. The policy should be amended to include this. Not legally compliant and not sound. (Hurtwood Polo Club)	and open space and promote outdoor recreation and access to the countryside.
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## Chapter 13 Rural Environment

### Key Stakeholders highlighted

Section/ paragraph no./Policy	Key Issues Raised	Council Response
<b>Introduction</b>	<ul style="list-style-type: none"> <li>Minor changes to wording. Suggested linking two sentences together. (Surrey Wildlife Trust and <b>Surrey Nature Partnership</b>)</li> </ul>	Agreed to improve readability. <i>Minor mod</i>
<b>Countryside Beyond the Green Belt. Policy RE1</b>	<p>NPPF does not require countryside beyond Green Belt to be safeguarded. Policy conflicts with NPPF and should be amended.</p> <p>Open countryside comprising strategic gap between Rowledge and Wrecclesham, Rowledge and Boundstone should be protected to prevent coalescence of settlements.</p> <p>Object to land south of Monkton Lane LAA 657 being included in RE1 land. Exhibits urban fringe characteristics. Land found in Landscape Study to have capacity for development.</p> <p>Disappointing to have so much reliance on saved policies. Continued reliance on RD2 and 2A not in accordance with NPPF.</p>	<p>Disagree. The NPPF has as part of one of its core planning principles (NPPF 17) the need to recognise the intrinsic character and beauty of the countryside and supporting thriving rural communities within it. As such, there is the need to safeguard or provide a degree of protection to land that has been designated as countryside, while recognising that some development can take place, particularly on the edge of towns and villages without harming its beauty or character.</p> <p>Disagree. These areas are protected through Policy RE1 and also RE3 as each has an identified Area of Strategic Visual Importance, which fulfils its purpose as identified in the Local Landscape Designation Review.</p> <p>Disagree. Local Plan Part 1 only allocates strategic sites. This site is below the threshold for allocation and would need to be considered in Local Plan Part 2 or the Farnham Neighbourhood Plan.</p> <p>Disagree. SoS direction 2007 does not state that they become out of date on adoption of new plan, particularly LPP1. It does state that the saved policies should be read in context as it is likely that new national and regional policy would have considerable weight. Saved policies will continue to be saved until the adoption of LPP2. Disagree that if policies are old, they are automatically out of date or do not comply with the NPPF.</p>

## Chapter 13 Rural Environment

### Key Stakeholders highlighted

	<ul style="list-style-type: none"> <li>• Policy should have exact wording of para in NPPF: too vague.</li> </ul> <p>Suggest rephrasing of Policy: ‘Policy RE1 Non Green Belt Countryside</p> <ul style="list-style-type: none"> <li>• The Countryside beyond the Green Belt will be protected for its intrinsic character and beauty and as a recreational asset, recognising the significant contribution that the high quality and unspoilt landscape makes to the distinctive character of the Borough. New development must respect and, where appropriate, enhance the distinctive character and beauty of the countryside. Building in the countryside will be strictly controlled and there will be a general presumption against development in the open countryside’. (CPRE)</li> </ul>	<p>Disagree. This is the Council’s approach to this Policy which is in accordance with the NPPF, and there is no need to repeat it in the Local Plan.</p>
	<p>Policy RE1 conflicts with SS7 Strong support for Policy. SS7 must be reviewed for consistency with it (POW, <b>Dunsfold PC</b>)</p>	<p>Disagree. This does not conflict with policy SS7. The designation will need to be taken into account in any development proposals.</p>
	<p>RE1 should include a buffer zone to the west of Cranleigh Unduly protective and wide reaching given the need for the local plan to balance the meeting of the need for development given that so much of the district is restricted by the presence of national designations, which are proposed to be extended in the AONB review.</p> <p>Would prevent development coming forward on the edge of settlements.</p>	<p>Disagree. Policy does give adequate protection. Disagree. Not agreed. The withdrawn Core Strategy identified that there was not sufficient land within the built up areas of the borough to meet its future housing needs which resulted in the need for the Green Belt Review and Landscape Review. Both studies have identified land which has potential for having its designation removed.</p>
	<p>Recognises the need to protect land within the Green Belt, but should not be at the expense of Countryside beyond the Green Belt which should be given equal protection. Should revert to previous wording. (<b>Plaistow and Ifold PC, Alfold PC</b>)</p>	<p>Disagree. Land so designated cannot have the same status as Green Belt or the same level of protection, because it does not fulfil the requirements of Green Belt status. All countryside beyond the Green Belt around the settlements has been reviewed as part of the</p>

## Chapter 13 Rural Environment

### Key Stakeholders highlighted

		Green Belt Review and only limited recommendations to designate as Green Belt have been made.
	<p>Policy is being undermined or weakened so that the Council can claim to meet the OAN in full. In doing so the character of Waverley will be sacrificed to achieve an unsustainable result itself a breach of the NPPF.</p> <p>Council has nothing of its own to say any more about how it thinks development in these areas will be controlled. (CPRE)</p> <p>Object to development in countryside beyond the Green Belt.</p>	Disagree. The council recognises that it is not possible to meet its needs in full through developing brownfield and urban land. Therefore the policy approach is to avoid land of the highest amenity value as stated in Policy SP2. The NPPF does not say that it is not acceptable to build in the countryside as a matter of principle.
	Policy fails to refer to the character of the countryside, overlooking the different contribution that different areas make.	Agree. The Policy as written does not include reference to the character of the countryside, which the NPPF does, and this amendment could be made. Amend wording to include. <i>Minor mod</i>
	Change wording to recognise this: 'Within areas shown as Countryside beyond the Green Belt on the Proposals Map, the <b>value</b> of the countryside will be recognised and safeguarded in accordance with the NPPF.	Disagree. The Policy as worded provides adequate protection. A modification has been suggested; see line above.
Metropolitan Green Belt (13.7 and 13.8)	13.8 Legal provisions protecting the Green Belt require Local Authorities to consider much more than promoting sustainable patterns of development. This statement is misleading and does not consider the other legal requirements the council should consider in protecting the Green Belt.	The NPPF does list other factors to take into account when reviewing Green Belt boundaries and these are listed in paras 84 and 85 of the NPPF, and do not need to be repeated in the Local Plan. Taking account of the need to promote sustainable pattern of development is the primary requirement.
Green Belt Review	<ul style="list-style-type: none"> <li>• There are no exceptional circumstances that warrant the removal of areas of Green Belt from Waverley.</li> <li>• Green Belt land too valuable to be lost forever/ supposed to be sacrosanct</li> <li>• Extension of Elstead, Witley and other villages do not appear to match Government policy or have the special justification provided.</li> <li>• Unacceptable to release Green Belt land and suggest</li> </ul>	Not agreed. Paragraph 13.11 explains the Council's position in relation to the review of its Green Belt. The Review, carried out by consultants, considers that exceptional circumstances do exist to justify amending the Green Belt boundary to exclude some areas and designate others. The reasons for this are explained in more detail in the Green Belt Topic

## Chapter 13 Rural Environment

### Key Stakeholders highlighted

	spurious additional Green Belt in another part of the borough	Paper.
	Waverley has ignored restrictions of policy within para 14 of NPPF with footnote 9. Not legally compliant. Local Plan has not paid due regard to guidance from the Secretary of State in respect of policy on Green Belt ( Planning and Compulsory Purchase Act 2004) S 19(2)(a)	Not agreed. In considering Green Belt changes, full account has been taken of national policy in the NPPF.
	<ul style="list-style-type: none"> <li>• Not sound. Waverley has treated the OAN as overriding all other provisions in the NPPF, meaning that the Plan is severely flawed. Unmet need is not a reason to allow Green Belt development.</li> <li>• Review should not be used as a vehicle to allocate more land for housing.</li> </ul>	Disagree. The council recognises that it is not possible to meet its needs in full through developing brownfield and urban land. Therefore the policy approach is to avoid land of the highest amenity value as stated in Policy SP2. The NPPF does not say that it is not acceptable to build in the countryside as a matter of principle.
	The only amendments to Green Belt boundaries should be where those boundaries are clearly inappropriate to support the specific aims of Green Belt policy.	Agreed. This is what has resulted from the Green Belt Review.
	The character of the villages to be removed will change	Not agreed. Local Plan Policy RD1 seeks to allow appropriate development such as infilling within settlement boundaries and this will still be the case. AONB and AGLV will still be a consideration if applicable.
	Houses built in Green Belt are invariably not the affordable houses that councils have been tasked by the government to supply	Not agreed. Many of the schemes built in Waverley's villages have been small scale rural exception schemes and Policy AHN2 will allow for such schemes in accordance with national policy.
	The Conservative party has broken its pledge in 2015 not to alter any Green Belt boundaries.	The Council does not comment on political matters.
	Towns and Parishes haven't been consulted	Not agreed. The Towns and Parishes are a statutory consultee as a 'relevant body' as defined in the Planning Regulations are consulted at every stage of the Local Plan process.

## Chapter 13 Rural Environment

### Key Stakeholders highlighted

	<ul style="list-style-type: none"> <li>• Unclear whether Council has considered opportunities for local development at sustainable locations without necessitating a review of the Green Belt (GB) boundary.</li> <li>• All brownfield sites should be built on first</li> </ul>	<p>Not agreed. The withdrawn Core Strategy identified that there was not sufficient land within the built up areas of the borough to meet its future housing needs which resulted in the need for the Green Belt Review. The Green Belt Topic Paper explains the reasons for this in more detail.</p>
	<p>Approach to development of settlements currently in GB is confusing. Evident from 13.18 that GB boundaries at Chiddingfold, Elstead, Milford and Witley are to be reviewed in Part 2. On that basis council cannot have the certainty that these settlements will be able to accommodate the levels of development expected through Policy SP2.</p>	<p>Not agreed. The Council does have a degree of certainty in relation to the settlements being able to accommodate the levels of development expressed in Policy SP2, since it has identified sites in those villages and in the areas where there is a recommendation to amend the Green Belt boundary. These sites have been promoted through the Land Availability Assessment 2016 and are assessed as being suitable, available and achievable during the Plan period, if the suggested changes to the Green Belt are made</p>
	<p>Term 'washing over' the GB is disingenuous, treating villages as though they are not truly within the GB.</p>	<p>Not agreed. This is a nationally used planning term used to describe villages that are within the Green Belt.</p>
	<p>Misleading to suggest Rural Settlement boundaries obviate the need for GB protection.</p>	<p>Not agreed, the Local Plan follows NPPF guidance on the treatment of villages in the Green Belt (NPPF para 86)</p>
	<p>Object to plan identifying land within AONB and AGLV for removal from GB to enable it to be developed (Surrey Hills AONB Board)</p>	<p>Disagree . This will not affect these designations which will still need to be taken into account when considering development proposals.</p>
	<p>Had Dunsfold Aerodrome been classified as the fifth main settlement, there would have been no need for a GB Review. Instead, Waverley should be prepared to adopt a policy of selective releases of Green Belt where there is sufficiently large community gain such as the factors identified in chapter 9.</p>	<p>Disagree. The Council considers that the level of development proposed at Dunsfold is correct. The Green Belt releases proposed are informed by the Green Belt Review.</p>
	<p>Prefer to treat broad areas as rural exception sites rather than at the demand of inward migration derived from OAN as most of villages affected are in AONB/AGLV (CPRE)</p>	<p>Not agree. The process for Green Belt release is defined in the NPPF and the evidence provided by the Green Belt Review shows that there is</p>

## Chapter 13 Rural Environment

### Key Stakeholders highlighted

		justification in taking the approach in the Local Plan, enabling the identification of strategic sites. Rural exceptions sites are by their nature small in scale and for affordable housing schemes.
	Part 1 of Green Belt Review said that parts of GB around the school (Charterhouse) was of limited value to the GB but Part 2 recommended no boundary changes as use was sport/recreation. Plan is unsound as the clear recommendation in Part 1 was too easily dismissed. Suggests reconsideration of Green Belt Review. (Charterhouse School)	Not agreed. Para 81 of the NPPF indicates that sport and leisure is a beneficial use in the Green Belt.
	Object to suggestion that the Wonersh rural settlement boundary be amended in the way shown in the Green Belt Review (Wonersh PC)	Noted. This will be reviewed in Local Plan Part 2 in consultation with communities.
	Should not delay review of Green Belt boundaries as delays housing sites coming forward. (Home Builders Federation, N Secrett, Elm Group, Wates Developments)	Disagree. Not reliant on these sites coming forward in the early years of the Local Plan. Waverley wants to work with the Neighbourhood Plan teams of the affected villages to confirm the final boundaries.
	Support RE2 in so far as it affects Elstead (Elstead PC and Elstead and Weyburn NP Steering Group)	Support welcomed.
Green Belt amendments: support	Council should consider inseting other Waverley settlements from the Green Belt to allow limited infill and other development to take place without harming them or their setting. These include Shamley Green and Thursley.	Not agreed. The Green Belt Review has looked at all villages in Waverley that have a rural settlement boundary and made recommendations in respect of those which could be amended, even if they are not to be removed from the Green Belt. Neither Thursley nor Shamley Green has been recommended for amendment. Saved Local Plan Policy RD1 continues to allow for limited infilling in certain villages which include both Thursley and Shamley Green.
	<ul style="list-style-type: none"> <li>Support findings of Green Belt Review, in particular the land identified to the west of Milford. Should be removed under part 1 to bring certainty to the delivery of homes in Milford. (Crown Golf)</li> </ul>	Support welcomed.

## Chapter 13 Rural Environment

### Key Stakeholders highlighted

	<ul style="list-style-type: none"> <li>Support recommendation that Bramley remains washed over (Bramley PC)</li> </ul>	
Removal of Land south east of Binscombe: support for removal of area from Green Belt	Support release of this area which is underpinned by an extensive and sound evidence base. Should be allocated as a site to help meet local needs, not least the delivery of affordable housing.	Support welcomed.
Removal of Land south east of Binscombe: general objections to removal of area from Green Belt (Many individuals CPRE Surrey Surrey Hills AONB Board Compton PC Godalming Town Council)	<ul style="list-style-type: none"> <li>Should not be released to meet Waverley's housing needs.</li> <li>Other sites available and more suitable, only earmarked for 30 dwellings, probably unnecessary given availability of other sites.</li> </ul>	<p>Disagree. This site is has been identified in the Council's Green Belt Review as one which can be released from the Green Belt. The reasons for this are contained in the Review and the Green Belt Topic Paper.</p> <p>In order to meet the full, objectively assessed needs for housing, Waverley needs to identify land that is available and suitable.</p> <p>A number of sites have been promoted within Godalming and these are identified in the Land Availability Assessment 2016. There is still not enough land within existing settlements to meet the need for new homes, which is why the Council has to identify greenfield releases on the edge of settlements across the borough. There are still only limited opportunities to expand Godalming through greenfield development on its edges due to the constraints of the Green Belt and the AONB, and this is one of two identified sites which have the potential for development if removed from the Green Belt.</p>
	Question need for building in Farncombe. Land south of Northbourne has been available for years and yet never built on	Not agreed. This site was reserved to meet longer term development requirements in the 2002 Local Plan. This was reserved until the council could not demonstrate a five-year housing supply.
	Description 'helps to define the western edge of Godalming but does not contain it' is incorrect. Western edge of Godalming is alongside Copside which has covenant for council to maintain this land.	Disagree. The Green Belt review has identified the justification for the boundary shown.

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	<ul style="list-style-type: none"> <li>• Poor analysis of land running three sites together</li> <li>• Incorrect conclusions, inconsistent and inaccurate. Analysing smaller sites would give more accurate picture.</li> </ul>	
	<ul style="list-style-type: none"> <li>• Land is AGLV .</li> <li>• Field forms part of wider AGLV landscape rather than relating visually and functionally to settlement from which it is screened. Essential to integrity of adjoining conservation area because of history and character. No reference to removal from AGLV (Surrey Hills AONB Board)</li> </ul>	Noted. This designation will still need to be taken into account when considering any development proposals. Amend wording in para 13.12 to include reference to AGLV.
	Development on any site within AONB and AGLV should include at least 50% affordable housing to justify taking protected landscapes for development. (Surrey Hills AONB Board)	Disagree. The Council considers that there is not enough evidence to justify a significantly higher affordable requirement for housing on such sites.
	Waverley ignored core government principle in para 17 of the NPPF which states the allocation of land for development should prefer land of a lesser environmental value .	Disagree. The Council has sought to designate land of lesser environmental value, but in certain locations where there are blanket designations, it has had to balance this against issues of local need.
	(Binscombe and Aaron's Hill) Should not be designated for housing, but any development considered as an exception to policy and used to meet community's infrastructure needs such as a new medical centre or 'extracare' facility, which would be viewed more positively. (Godalming Town Council)	Disagree. Should sites come forward; the Council will need to consider any infrastructure requirements as part of any development proposals.
	Note that this site and land at Farncombe have been rejected on the basis that the Guildford Borough Proposed submission Local Plan does not propose to amend Green Belt boundaries. GBC is still assessing the comments submitted and the extent to which this may change policies and proposals within that document. Welcome further discussions regarding cross boundary site allocations as both authorities continue to progress respective local plans. (Guildford Borough Council)	Noted.
Binscombe Site: specific development objections	<ul style="list-style-type: none"> <li>• Developing this area doesn't take account of practical issues such as pressure on health and education</li> </ul>	This site has been promoted through the Council's Land Availability Assessment 2016.



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	<ul style="list-style-type: none"> <li>• Traffic on narrow road with no footpaths</li> <li>• Too much traffic on Furze Lane</li> <li>• Road safety issues</li> <li>• Additional pressure on drainage</li> <li>• Land is AGLV as well</li> <li>• Binscombe (road) is a clearly defined boundary between the rural area and housing established years ago</li> <li>• The substantial belt of trees is also a clearly defined boundary to the settlement, its purpose was identified in planning permission over 40 years ago</li> <li>• Potential harm to the conservation area which is distinctive and rural, and adjacent Listed Buildings</li> <li>• Increase in density of dwellings out of character of area</li> </ul>	It has not been allocated for housing in this Local Plan. Any consideration of it as a development site would be undertaken as part of any future planning application.
Removal of Land between Aaron's Hill and Halfway Lane, Godalming	Object to firm proposal for housing. Reference should be made to the land being in the AGLV and justification given for development. (Surrey Hills AONB Board)	The site has not been allocated for housing in the Local Plan. Amend wording in para 13.14 to include reference to AGLV. <i>Minor mods</i>
	Development on any site within AONB and AGLV should include at least 50% affordable housing to justify taking protected landscapes for development. (Surrey Hills AONB Board)	Disagree. The Council considers that there is not enough evidence to justify a significantly higher affordable requirement for housing on such sites.
	Site's feature of permanence and openness makes it inappropriate for removal from Green Belt (CPRE)	This site is has been identified in the Council's Green Belt Review as one which can be released from the Green Belt, subject to further discussions with Guildford Borough Council. The reasons for this are contained in the Review and the Green Belt Topic Paper.
	Different site to that referred to in AMEC review and not recommended for removal (CPRE)	Disagree. The site is the same as that indicated in the Green Belt Review and which is recommended as having potential for removal from the Green Belt in co-ordination with Guildford Borough Council. (Green Belt Review Part 2: Executive Summary and 2.1.6)
	Note that Land at Aarons Hill, Godalming is considered to be a potentially suitable site and will be considered further in	Noted.

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	<p>LPP2 subject to further discussions with GBC. Consultation on the Guildford borough Proposed Submission Local Plan: strategy and sites completed in July 2016. GBC still assessing the comments submitted and the extent to which this may change policies and proposals within that document. Welcome further discussions regarding cross boundary site allocations as we both continue to progress our respective local plans. (Guildford Borough Council)</p>	
	<p>Should remove in Local Plan Part 1 (CBRE)</p>	<p>Disagree. Due to the site being both within Waverley and Guildford Borough, further discussion between the two authorities needs to take place, as suggested in the Green Belt Review and also by Guildford Borough Council in its response above.</p>
<p>Green Belt and Landscape Study document specific comments</p>	<p>Disagree with low score given in Landscape Study in relation to Ruffold Farm, Cranleigh, is a wooded area.</p>	<p>Noted.</p>
<p>Chiddingfold</p>	<ul style="list-style-type: none"> <li>• For settlements other than Chiddingfold, Local Plan identifies sites suitable for Green Belt release and development. This has not been consistently applied and no such sites have been identified at Chiddingfold.</li> <li>• LAA site 286 is available and deliverable and should be identified, as it is also suitable for release from the Green Belt as identified in the Green Belt Review</li> <li>• Local Plan seeks to delay wider review of Green Belt boundary in Chiddingfold until the Neighbourhood Plan can be progressed. Not justified to rely on NP to allocate land to meet housing need.</li> </ul>	<p>The approach to the review of Chiddingfold's Green Belt boundary is considered to be justified, as set out in the Local Plan and the Green Belt Topic Paper. Chiddingfold's Neighbourhood Plan steering group is in the process of identifying a number of sites as alternatives to the two identified in the LAA both adjoining and within the settlement boundary, and the Council has agreed that that the detailed changes to the Green Belt boundary can be made through Part 2 and in consultation with the local community. This is also because together, these sites are larger than would be required to meet Chiddingfold's allocation of dwellings.</p>
	<p>Object to two areas referred to in 13.19 and 13.20 being left in as potential sites for development. PC has criticized this inclusion in initial Core Strategy. 'We object to the statement that "the existing settlement area is</p>	<p>Disagree. The areas referred to in paragraphs 13.19 and 13.20 are not allocated for development in the Local Plan. Any changes to the settlement area will be agreed with the</p>

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	to be removed from the Green Belt." ...We do not agree with the principle as there is nothing to be gained by it and secondly the statement is incorrect as only the western part of the settlement area, bounded by Coxcombe Lane, Ridgley Road and Woodside Road is to be removed.' (Chiddingfold PC)	Neighbourhood Plan and the community in Local Plan part 2.
Elstead: general objections to removal of area from Green Belt	Objection is raised because of concern that two areas at Elstead and three at Milford are shown to be considered further in Local Plan Part 2 for possible future development may cause harm to the AONB . No reference is made in the Plan to these areas being within the AONB or that any overriding justification exists for their possible development. (Surrey Hills AONB Board)	Amendment to be made to relevant paragraphs to give information on designations. <i>Minor mods</i>
	Should rely on sensitive infilling	Disagree. There is not enough land within existing settlements to meet the need for new homes, which is why the Council has to identify greenfield releases on the edge of settlements across the borough.
	Leave process of land re-designation and identification of sites to the neighbourhood plan	Disagree. The Local Plan states at para 13.18 that detailed boundary changes will involve consultation with the local communities, and hopefully sit alongside work being carried out on relevant Neighbourhood Plans. No sites have been allocated in Elstead in this Local Plan.
	Removal of designation will lead to pressure from developers, weakening protection against urban sprawl, harm to highly sensitive environment and habitats.	Disagree. The removal of the area within the existing settlement boundary from the Green Belt as proposed will make no difference in policy terms to the existing situation, since saved Local Plan Policy RD1 will continue to be applied.
	No evidence that Council has considered other sites.	Disagree. No sites have been allocated in Elstead in this Local Plan. The consideration of all promoted sites for housing is included in the LAA which is on the website and was part of the consultation.

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	<p>Proposal is in conflict with Objectives 6, 8, 10, 17 and 20</p>	<p>Disagree. The approach to the review of Elstead's Green Belt boundary is considered to be justified, as set out in the Local Plan and the Green Belt Topic Paper.</p>
	<p>Lack of consultation by council.</p>	<p>Disagree. The Green Belt Review has been part of the Council's evidence base since 2014, and was part of the consultation on scenarios at that time. The Council has undertaken extensive borough wide consultation using a variety of methods as shown in its consultation statement.</p>
<p>Hookley Lane sites (The Croft and Four Trees): objections to potential development sites</p>	<ul style="list-style-type: none"> <li>• GB, AONB, AGLV and SSSI</li> <li>• Lack of balance in identifying new sites around Elstead, sure be more even distribution</li> <li>• No more than one site to be identified to the east of the village</li> <li>• More than enough recent development in Hookley Lane</li> <li>• Pressure on drainage and roads</li> <li>• Flood risk/ surface water flooding is regular in area</li> <li>• Pressure on GP and School both at maximum capacity</li> <li>• Road safety for walkers and riders</li> <li>• Narrow pavement and lorries accessing farm</li> <li>• Effect on character of village and lane</li> <li>• Should redevelop Federal Mogul site instead</li> <li>• Land at Four Trees is of significant importance to wildlife</li> <li>• Hookley Lane leads on to SSSI and Nature Reserve</li> <li>• Backland development that will set precedent</li> <li>• Pressure on junction from Hookley Lane with B3001</li> <li>• Noise and fumes generated by traffic, effect on adjacent properties</li> <li>• Limited parking in Hookley Lane</li> <li>• Hookley Lane is a no through road</li> <li>• No village infrastructure improvements for ten years, limiting development</li> <li>• No employment opportunities in the village</li> <li>• These two developments should not be approved</li> </ul>	<p>These sites have both been promoted through the Council's Land Availability Assessment 2016. Neither site has been allocated for housing in this Local Plan.</p> <p>Any consideration of either as a development site would be undertaken as part of any future planning application.</p>

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	<p>together.</p> <ul style="list-style-type: none"> <li>• Conflicts with several Local Plan Objectives</li> <li>• Loss of value of property</li> <li>• Previous planning refusals in area</li> <li>• Poor access from Croft</li> <li>• Poor public transport</li> </ul>	
Milford and Witley	Release of Green Belt land at Lower Mousehill is fully supported	Support welcomed.
	Objection is raised because of concern that two areas at Elstead and three at Milford are shown to be considered further in Local Plan Part 2 for possible future development may cause harm to the AONB. No reference is made in the Plan to these areas being within the AONB or that any overriding justification exists for their possible development. (AONB Board)	Amendment to be made to relevant paragraphs to give information on designations. <i>Minor mods</i>
	Large number of homes proposed not sustainable due to lack of infrastructure and services.	The Infrastructure Delivery Plan seeks to identify all infrastructure improvements required to support development.
	Keep separation between villages.	Agreed. The Green Belt Review has not recommended the release of any land between the two settlements as it prevents coalescence between Milford and Witley.
	Support Green Belt being kept between Milford and Witley. (Witley PC)	Support welcomed
	Seek to protect Green Belt space in Cramhurst Lane/Wheeler Street area. (Witley PC)	Noted.
	Land adj Barrow Hills School should be removed from the Green Belt and could be allocated for housing ad other community benefits.	This is not an area that is recommended for removal from the Green Belt and would therefore not be suitable for any housing allocation.
	Not clear on Green Belt Review analysis. NP will emphasise use of brownfield land and will prioritise this in proposed call for sites. Want to be involved in future insetting and alteration of settlement boundaries (Witley Neighbourhood Plan Steering Group)	Noted. The Local Plan encourages the redevelopment of suitable brownfield sites, and fully supports the involvement of the local communities in revising settlement boundaries as indicated in para 13.18.
Policy RE2 likely to lead to increased recreation pressure on	Noted	

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	Milford and Witley Commons and the Wealden Heath Phase II SPA, and therefore appropriate mitigation will be required. (National Trust)	
	Suggest an additional LAA site in Witley (not considered in LAA) and amended policy wording to include this site in Policy RE2 (Comment ID 1051)	Not accepted. This site has yet to be assessed, and no specific sites are included in the wording on Policy RE2.
	Further Promotion of Highcroft Site.	Noted. Highcroft is identified in the LAA 2016.
Churt	<ul style="list-style-type: none"> <li>Gatesbury Site LAA 393. This site has been promoted since 2012. It makes limited contribution to GB in review, no material contribution to five reasons for including in Green Belt.</li> <li>Churt boundary should be revised to include it within the settlement boundary</li> </ul>	Not agreed. Rejected in LAA as outside settlement. This is not an area that is recommended for removal from the Green Belt and would therefore not be suitable for any housing allocation.
Land south of Rowledge	<ul style="list-style-type: none"> <li>Object to decision of Waverley not to designate this whole area ( including Dockenfield) as GB as recommended in GB Review. Provides separation between Rowledge and Frensham and fulfils all five criteria for Green Belt (Farnham TC, Frensham PC, Farnham Society and others)</li> <li>Rejection on grounds that the areas is not under pressure is not one of the tests for GB designation (Farnham TC, Dockenfield PC)</li> <li>Area is under pressure and has lost over 4,000 trees, increase in flooding and loss of habitat and privacy. Clear failure on part of agencies that have protection of nature remit. (Frensham Vale Action Group)</li> <li>Should include all of AGLV south of the Long Road, Rowledge into Green Belt</li> <li>Dockenfield not mentioned in plan. Will be left on border with no effective representation from housing development in Bordon, no plan for public transport. Waverley has gone against Green Belt Review.</li> </ul>	The Green Belt Review indicated that there 'might be potential to designate land south of the Long Road, to leave room for the longer term growth of Farnham whilst protecting open countryside to the south'. The Council does not envisage the re being pressure for development in this area, and that there is not an exceptional case for changing the Green Belt in this area.
	<ul style="list-style-type: none"> <li>Check map in Topic Paper, different boundary to AMEC report. (Frensham PC)</li> </ul>	Disagree. Map in Topic Paper page 11 is a copy of the map in the AMEC report (Part 2 page 71)

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Land with potential to be added to the Green Belt (support)	<ul style="list-style-type: none"> <li>• Support additions to Green Belt (CPRE)</li> <li>• Support extension to GB at Cranleigh (Cranleigh PC, Wonersh PC and others)</li> <li>• Support additional area north east of Farnham (Farnham TC)</li> </ul>	Support welcomed
Land with potential to be added to the Green Belt	<ul style="list-style-type: none"> <li>• Object to omission of site adjoining south east of Horseshoe Lane: Area U in Green Belt Review. Omission not justified having regard to development of 125 units permitted on part. (Cranleigh PC) (Comment ID 1072)</li> <li>• Object to omission of site west of Alfold Road (Cranleigh PC) (Comment ID 1072)</li> </ul>	<p>Disagree. The Green Belt Review indicated that the dominant use of this land is sports pitches, while the remainder is well-enclosed pasture. It concluded that designation would serve no clear. Strategic purpose given the strong boundary set by the B2130.</p> <p>Disagree. The area to the west of Alfold Road was never identified in the Review as an area with any potential to be added to the Green Belt.</p>
Land with potential to be added to the Green Belt (Objections)	<ul style="list-style-type: none"> <li>• Problem in finding land to allocate as high proportion that has designations. Should increase the available land by removing or downgrading some classifications. Do not think that land should be added to GB</li> <li>• No exceptional circumstance to extend.</li> </ul>	<p>Noted.</p> <p>The Green Belt review has identified some land for removal from the Green Belt, and also some areas to be added using assessment against the five purposes of the Green Belt.</p>
	Cranleigh Given doubt over housing delivery, establishing new Green Belt around Cranleigh cannot be justified. (Notcutts Ltd)	The Green Belt review identified areas to be added using assessment against the five purposes of the Green Belt, and as such this approach is justified.
	Amendment is attempt to stagnate development potential on outskirts of Cranleigh (Notcutts Ltd)	Disagree. The Council has followed the recommendations of the Green Belt Review in this area.
	Extension to Green Belt would restrict ability of school to meet legal duty as a charity, through constraining adding to built form and other facilities. (Cranleigh School)	Noted, however, the NPPF states that previously developed land in the Green Belt can still be developed in certain circumstances. Para 89.
	Land at Ruffold Farm, Guildford Road, Cranleigh. Submitting a site for consideration. Suggest site should not be included in revised green belt boundary, and should remain in CBGB.	The suggested inclusion of this land into the Green Belt is justified in the Green Belt Review.
	<p>Land to the north east of Farnham around Compton</p> <ul style="list-style-type: none"> <li>• Some of this land is attractive but should not include the</li> </ul>	The suggested inclusion of this land into the Green Belt is justified in the Green Belt Review.

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	<p>largest section to the south of A31 and north of Compton Way plus waste sites should be excluded from Green Belt.</p> <ul style="list-style-type: none"> <li>• Fails to meet the 'exceptional circumstances' justifying the alteration to the Green Belt boundary. Council has not demonstrated why normal planning policies such as RE3 would not be adequate. (Rowen Properties and SUEZ)</li> <li>• Quarry with landfill restrict development without need for Green Belt (SUEZ)</li> <li>• Proposed extension to Green Belt to the north east of Farnham around Compton includes one quarry that is subject to an approved restoration plan (Runfold North) and one operations quarry (Runfold South). There should not be any conflict between the proposed restoration/ enhancement plans and the Green belt policy since relevant Minerals &amp; Waste Plan policies promote uses that are appropriate to maintaining an open setting. (Surrey County Council)</li> </ul>	<p>Noted.</p>
<p>Policy RE2: Green Belt</p>	<ul style="list-style-type: none"> <li>• The phrase “.... new development will be considered to be inappropriate.....” should be re-phrased. The third sentence should be re-worded as follows: “Certain forms of development are considered to be appropriate in the Green Belt. Proposals will be permitted where they do not conflict with the exceptions listed in national planning policy”. (Twist Homes)</li> <li>• Strongly support both RE2 and RE3 (Peper Harow PC)</li> </ul>	<p>Agreed. This would clarify the policy without changing its meaning. <u>Minor mod</u></p> <p>Support welcomed.</p>
<p>The Surrey Hills Area of Outstanding Natural Beauty and Great Landscape Value</p>	<p>Policy RE3 –support the policy but suggest it goes further to include reference to the aims and objectives of the Surrey Hills AONB Management Plan and recognise the importance of the setting of the AONB. Suggest additional wording stating 'any development likely to harm the site will not be supported, unless they can satisfy the major developments tests of the NPPF' and refer to paras 115</p>	<p>Agree to amend the text in para 13.32 to include aims and objectives of the Management Plan (<u>minor mod</u>). However, disagree that the wording of the policy needs to be changed as it makes direct reference to the application of national policy. In addition, para 13.33 also refers to para 116 of the NPPF.</p>



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	and 116 in NPPF in the policy wording. (Natural England)	
	Need for two distinct policies to deal with AONB and AGLV. Sub text distinguishes between national and local designation while policy does not. Policy puts AGLV and AONB on parity, not in accordance with NPPF. They do not have the same status as implied in text. (PLOT Farnham and others)	Disagree. There is no need for two policies. The text in paragraph 13.38 makes the differences and the Council's approach through the policy clear.
	Concern that only part of existing AGLV areas may be included in the AONB and part of review. This would result in loss of protection. Same principles protecting AONB should be applied to AGLV.	Disagree. The text in paragraphs 13.38 sets out the Council's approach.
	Support is given to the AONB and AGLV aspects of Policy RE3 – Landscape and supporting text with the suggestion of the following slight rewording of the first sentence: “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.” (Surrey Hills AONB Board)	Agree. Text in Policy RE3 to be changed. <i>Minor mod</i>
	Policy weakened and put at risk NPPF provisions designed to ensure sustainability of these areas. No ideas as to how Waverley thinks development will be controlled in these areas. Abdication of protective role. Will lead to pressure for development. Suggest rephrasing. (CPRE) NPPF does not make it mandatory to reduce protection before or after review: when the Burnett review was agreed, Government accepted designation could be retained if robustly justified (CPRE)	Disagree. The policy is in accordance with National Policy. The Council's approach is set out in para 13.38.
	Removal of land from GB may adversely affect AONB and AGLV	Disagree. This will not affect the designations which will still need to be taken into account when considering development proposals.
	Some LAA sites which are sustainable have been rejected	A number of factors were taken into account

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	because they are in AONB. AONB is not a blanket ban on development. Potential needs to be followed up with NE and included in work on boundary review.	when considering LAA sites. The Council has sought to prioritise them in accordance with National Guidance using para 110 of the NPPF.
	The AGLV is out of date and should be deleted from plan.	Disagree. The treatment of the AGLV is consistent with the approach of other local authorities pending the AONB Review.
	Suggest AGLV boundary is reviewed now to ensure the Local Plan is justified by up to date evidence and landscape designations can be protected (Farnham TC)	Disagree. The treatment of the AGLV is consistent with the approach of other local authorities pending the AONB Review.
	Strongly support extension of AONB and welcome proposal that pending review, AGLV should be retained. (Dunsfold PC)	Support welcomed.
	Support RE3, however should refer to duty to enhance AONB, not just protect it, and mention the 'great weight' afforded under NPPF. ( National Trust)	Disagree. The policy makes clear the reference to the application of the NPPF, and there is no need to repeat this here.
	Plan is unsound as Policy RE3 conflicts with national policy. Policy seeks to apply same principles for protecting AONB as AGLV. Unjustified.	Disagree. The text in paragraph 13.38 makes the differences and the Council's approach through the policy clear.
	Land at Binscombe should be removed from the AGLV, as has been identified in Landscape Review as a site which could accommodate development.	Disagree. The AGLV cannot be removed now from individual sites. This would be an issue for the Review. In the meantime the designation will need to be taken into account in any development proposals.
	Policy RE3: Supported but suggest that Dunsfold aerodrome conflicts with this policy due to AONB (Plaistow and Ifold, Chiddingfold, Hascombe and Alfold Parish Councils)	Disagree. This does not conflict with policy RE3. The designation will need to be taken into account in any development proposals.
	The AONB review is taking too long. Want Dockenfield to receive higher protection than AGLV. Has been listed as one of the highest importance areas to be included in the AONB at review stage. Why are WBC not assigning this status now as are other boroughs including Guildford (Dockenfield PC)	Disagree. This will be an issue for Natural England when reviewing the AONB. The approach for now is the same that is being taken by other Surrey Authorities.
	Suggest including wording 'should not visually impact to it or	Disagree. RE3 vii refers to the setting of the

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	from it' in RE3 vii in relation to the South Downs National Park.	National Park and so consideration of the impact on it, for any proposal outside it in Waverley, is covered.
	<p>In order to be sound the AGLV policy framework needs to be changed to distinguish between:</p> <ul style="list-style-type: none"> <li>• Areas that are candidates for inclusion in the AONB to which a proxy-AONB policy may be justified;</li> <li>• Areas that are not candidates for inclusion in the AONB where the application of AONB level policy is inappropriate RE3 currently fails to distinguish between the hierarchy of international, national, and locally designated sites. It offers the same degree of protection to both AONB and the entirety of the AGLV The 38 areas identified as having the same attributes as the designated AONB may require additional protection in advance of formal designation as AONB. The same does not apply to the remaining areas of the AGLV (Hurtwood Polo Club)</li> </ul>	Disagree. Candidate areas that have potential have been identified, but the final decision is a matter for the AONB Review. There is, at this stage, no certainty that they will be confirmed. The approach for now is the same that is being taken by other Surrey Authorities.
	Object to use of AGLV as a criterion in the SA assessment. If the designation is not justified then this will undermine the SA for some LAA sites (PLOT (Farnham))	Disagree. The AGLV is a recognised landscape designation which merits inclusion in the hierarchy of landscape designations.
	<ul style="list-style-type: none"> <li>• Object to any reduction of the AONB through the AONB Review ( Haslemere Society)</li> <li>• Some areas of AONB have been downgraded by developments such as the Hindhead Tunnel and should be removed from AONB</li> </ul>	Noted. These are matters for the AONB Review.
<b>Local Landscape Designations</b>		
The Farnham/ Aldershot Strategic Gap	Concerned at the likely coalescence of Farnham and Aldershot	Disagree. The aim of the gap will continue to be to prevent the coalescence of Farnham with Aldershot and this is stated in the Local Plan.
	<ul style="list-style-type: none"> <li>• Inappropriate to save the Strategic Gap policy until Local Plan part 2. It is a strategic designation but non statutory and there is no justification for its retention.</li> <li>• There is a clear Government presumption against local</li> </ul>	Disagree. It is appropriate to have local designations to protect the strategic gap, and to identify the boundary in Local Plan Part 2.

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	designations.	
	The boundary of the gap is out of date and doesn't take account of recent development in the area. Inconsistent with part of Policy SS2 which includes part of the gap.	Recent developments will be taken into account when the boundary of the gap is reviewed in Local Plan Part 2.
	Draft Neighbourhood plan does not seek to retain the Strategic Gap designation.	Disagree. The draft Farnham Neighbourhood Plan contains Policy FNP11 which seeks to prevent coalescence between Farnham and Aldershot.
	Rushmoor is supportive of the review of this designation and looks forward to working with Waverley on LP part 2 to ensure that the gap between Farnham and Aldershot is protected.	Support welcomed.
	A much more focused policy is needed to safeguard the strategic gap. Gap also maintains gap between Badshot Lea and Weybourne from each other and Farnham. Extent of the Gap should reflect what is shown on the Farnham Neighbourhood Plan. Can be achieved with compromising any development sites.	Agreed. The boundary will be revised in Local Plan Part 2.
	Support the idea of a strategic gap. Could same principle be applied to land between Dunsfold and Cranleigh?	Disagree. This type of policy would not be appropriate between Cranleigh and Dunsfold as these areas are less built up than Farnham and Aldershot and can be protected through Policy RE1.
	Area to the south of Badshot Lea should continue to be included.	The boundary will be revised in Local Plan Part 2.
	Gap should be increased to prevent coalescence between other areas in Farnham such as Rowledge and Wrecclesham, Hale and Farnham and made more robust. (Farnham Society)	Not agreed. These areas are protected through Policy RE1 and also RE3 as each has an identified Area of Strategic Visual Importance, which fulfils its purpose as identified Local Landscape Designation Review.
	Support review of Gap, but object to including 11a and 11c defined in Landscape Study as they have development potential.	Support welcomed. The boundary will be revised in Local Plan Part 2.
	Supports approach that a more focused strategic gap policy	Disagree. The approach towards the gap is made

## Chapter 13 Rural Environment

### Key Stakeholders highlighted

	<p>be developed, as well as the extent shown on Plan 8. However, last sentence of 13.43 should be deleted, as it cannot be correct to rely on saved Policy C4 in interim period between Part 1 and Part 2. The Policy should also be changed to state that "development proposals in this area will be determined on their merits having regard to the Council's intention to review the boundaries of the Gap as indicated...in Plan 8". (Bewley Homes)</p>	<p>clear in the Local Plan.</p>
Area of Historic Landscape Value	<p>Area should include historic Old Park to prevent coalescence of Farnham with Hale/ Aldershot. Neighbourhood Plan designates areas as having high landscape sensitivity and historic value. (Farnham TC, Old Park Lane Residents Assn, Farnham Society)</p>	<p>Disagree. This designation is not made by Waverley. Old Park was not included in the original listing of Farnham Park as an Area of Historic Landscape Value when originally designated by English Heritage (now Historic England). It is protected as Countryside beyond the Green Belt and as an Area of Great Landscape Value.</p>
	<p>Support designation and support saving of existing Heritage policies until LP Part 2 (Surrey County Council)</p>	<p>Support welcomed</p>
ASVI general	<ul style="list-style-type: none"> <li>ASVI policy is an out-of-date hybrid policy with no justification for it. The layering of locally derived policy designations is no longer supported by National policy. All reasons for it can be addressed through other local plan policies. (Thakeham Homes and Gladmann Developments)</li> <li>Wording changed to clarify maintenance and enhancement and guidance for developers. (Farnham Society)</li> <li>LP states that ASVIs are important and strategic. If Dunsfold development is built there will be a unstoppable pressure for development between that site and Cranleigh. (Dunsfold PC)</li> </ul>	<p>Disagree. Local designations do have value as confirmed in the Local Landscapes Designation Review.</p>
Loss of ASVI designation at Holy Cross, Haslemere	<ul style="list-style-type: none"> <li>Object to the removal of the land south of Holy Cross Hospital from the ASVI. If the designation was removed from this area it would become subject to pressure for development. Also the word 'only' before limited</li> </ul>	<p>Disagree. The approach is made clear in the Local Plan and follows the recommendations in the Local Landscapes Designation Review.</p>

## Chapter 13 Rural Environment

### Key Stakeholders highlighted

	<p>contribution reduces importance further. (Haslemere Society)</p> <ul style="list-style-type: none"> <li>• Area can be seen from Camelsdale. View is vital to maintain character and green environment of area</li> <li>• If there is no pressure for development, what is the justification for removal?</li> <li>• Site is a buffer against urbanization of the entire area, which was the original purpose of its designation. Identified in the Haslemere Design Statement (Haslemere Town Council and Haslemere Society)</li> </ul>	
ASVIs Farnham	<ul style="list-style-type: none"> <li>• Site at Long Acre, Long Garden Walk West. Suggest removal of area of land outlined from ASVI. Land does not comply with main issues the ASVI seeks to address as listed in Local Landscape Review.</li> <li>• Water Lane and Monkton Lane ASVIs do not play an important role in preventing coalescence. It is an out of date and hybrid policy. Layering of locally derived policy designations is no longer supported by National Policy. Justification through Local Landscape Designation Review is superficial at best. Review must include deletion of sites at Water Lane and Monkton Lane which are allocated for development (LAA sites)</li> <li>• Landscape Review indicated that not all ASVIs in Farnham met criteria, so continued designation conflicts. Also conflicts with some planning approvals, such as Crondall Lane and allocation of Water Lane.</li> </ul>	Noted. The ASVI boundaries will be reviewed in Local Plan Part 2. This will take account of sites that have since been developed.
Godalming Hillsides	<ul style="list-style-type: none"> <li>• Support policy but seek early warning if the boundary of the Godalming Hillsides is likely to change. (Godalming TC)</li> </ul>	Support welcomed and request noted.
General comments on Policy RE3.	<ol style="list-style-type: none"> <li>1. Concern that local landscape information out of date. (Cranleigh PC)</li> <li>2. Landscape Character Review suggests areas adjacent to Cranleigh are of high landscape importance but have no protection in the Local Plan. Suggest Policy SP2 re-worded to include reference to local landscape value.</li> </ol>	<ol style="list-style-type: none"> <li>1. The boundaries of several of the local landscape designation areas are to be reviewed in Local Plan Part 2 to take account of new developments and any other anomalies.</li> <li>2. Disagree that Policy SP2 should be amended. Local Landscape value does not need to be</li> </ol>

## Chapter 13 Rural Environment

### Key Stakeholders highlighted

	<p>(Cranleigh PC)</p> <p>3. Policy RE3 (Landscape Character) is strongly supported insofar as it affects Elstead. (Elstead PC) Strongly support both RE2 and RE3 (Peper Harow PC)</p> <p>4. Council should redefine rural settlement boundaries to allow limited development to take place without harm. Identify sites in Shamley Green and Thursley which are Brownfield land suitable for housing.</p>	<p>referred to in the overall strategy policy. Paras 13.40 and 13.41 include text on local landscape value.</p> <p>3. Support welcomed.</p> <p>4. Not agreed. The Green Belt Review has looked at all villages in Waverley that have a rural settlement boundary and made recommendations in respect of those which could be amended, even if they are not to be removed from the Green Belt. Neither Thursley nor Shamley Green has been recommended for amendment.</p>
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## Chapter 14 Townscape and Design

### Key Stakeholders highlighted

Section/ paragraph no./Policy	Key Issues Raised	Council Response
Policy TD1	Add reference to design matters relating to safe and easy access to new buildings, consideration to location of lifts and stairs, and illuminated stairwells, and crime-reducing design features, and reference to daylighting. Also the need to require developers to submit a noise assessment to avoid health impacts.	Noted. This is part of 'high quality' design but detailed matters will be addressed in LPP2 or as supplementary planning documents.
Policy TD1	Waverley should require design briefs where appropriate and ensure that details of design and materials are submitted and considered before an application is approved and not after.	Disagree. The requirement for design and material information is pertinent to the administration of planning applications and is not a strategic policy on development.
Policy TD1	Every effort should be made to provide the highest quality of exterior design when new buildings are constructed. Could any areas support buildings with a basement habitation and extra top stories to help first time buyers and students.	Noted. Many areas within Waverley are not suitable for basements and extra storeys.
Policy TD1	LPP2 should emphasise importance of LVIA of new developments.	Suggestion for LPP2 noted.
Policy TD1	Could include here something seeking every opportunity for biodiversity enhancements within townscape/urban design, e.g. use of native species mixes.	Noted. Can be looked into for more detailed Policy in LPP2.
Policy TD1	Delivery for the Policy will be key. Particularly support the Delivery of ongoing design training within Planning Services. Council often does not listen to local concerns such as unsightly tarmac in Chiddingfold.	Support welcomed. Waverley always listens to residents concerns over issues within the public realm, particularly within a conservation area where it may be harming the significance; however it is often not under our control.



## Chapter 14 Townscape and Design

### Key Stakeholders highlighted

<b>Policy TD1</b>	The policy could be more detailed, for example prohibiting houses of more than 3 stories and capping heights of other buildings.	Noted. There will be a more detailed design and townscape policy in Local Plan Part 2, which if necessary will have more specific local design guidelines based on assessments of local character.
<b>Policy TD1</b>	Not sound, suggests views of Parish Councils have not been taken into account with regard to the design of the development (Dunsfold). Proposals within planning application not in keeping with rural area.	Noted. This is a matter for the planning application.
<b>Policy TD1</b>	We need to be sure that any homes we build complement and enhance the local area.	Noted.

## Chapter 15: Heritage Assets

### Key stakeholders highlighted

Section/ paragraph no./Policy	Key Issues Raised	Council Response
<b>Policy HA1</b>	The Policy is not detailed enough and does not reflect national policy.	The Council has legal duties set out in the Planning (Listed Buildings and Conservation Areas) Act 1990 and a duty to have regard to national policy set out in the National Planning Policy Framework. These duties and details need not be repeated in local policy.
<b>Policy HA1</b>	Policy SS7 (Dunsfold Aerodrome, a heritage asset due to its use as a WWII airfield and subsequently as a testing ground for Hawker Siddeley) conflicts with HA1.	Heritage assets can be put to new uses and retain the significance attributed to them.
<b>Paragraph 15.4</b>	Haslemere Town Centre Conservation Area missing from list of completed appraisals.	Include Haslemere Town Centre in the list. Also state that the list includes those appraisals completed as of 19 <sup>th</sup> July 2016.

## Chapter 16 Natural Environment

Key stakeholders here

Section/ paragraph no./Policy	Key Issues Raised	Council Response
International Designations	Surrey Wildlife Trust [956] & Surrey Nature Partnership [1034] Minor wording changes to paras 16.4 and 16.5 regarding names and interest features of sites	<u>Agree. Accepted as minor mod</u>
Local Designations	<ul style="list-style-type: none"> <li>• Surrey Wildlife Trust [956] &amp; Surrey Nature Partnership [1034] Para. 16.13. "...They are also important for their biodiversity, as intrinsic wildlife habitats and in connection of as part of interconnected "green corridors".</li> <li>• Surrey Wildlife Trust [958] &amp; Surrey Nature Partnership [1028] Para. 16.16. "Canals and river corridors are examples of valuable 'wildlife corridors' providing <b>connections within and between habitat networks across the Borough.. In addition, the wider network of lesser watercourses and tributaries needs to be acknowledged..</b>"</li> <li>• Surrey Wildlife Trust [958] &amp; Surrey Nature Partnership [1028] Para. 16.17. "Waverley's landscape has a distinctive wooded character, with over 10,000 hectares of woodland; 32% of the borough."</li> </ul>	<u>Agree. Accepted as minor mod</u>
Policy Context	<p><b>Summary:</b> All minor comments clarifying names of organisations or sites.</p> <ul style="list-style-type: none"> <li>• Surrey Wildlife Trust (963) and Surrey Nature Partnership (1029). Para 16.22 Change Cranleigh Woodlands to Cranleigh Woods, and Change Commons to Heaths (x2)</li> <li>• Surrey Wildlife Trust (963) and Surrey Nature</li> </ul>	<u>All accepted as minor mods.</u>

## Chapter 16 Natural Environment

Key stakeholders here

	<p><b>Partnership</b> (1029). Para 16.23 Add words 'former/withdrawn' in front of Surrey Biodiversity Action Plan, and this partnership 'now' operates as. Plus a change in the list of priority habitats.</p> <ul style="list-style-type: none"> <li>Surrey Wildlife Trust (963) and <b>Surrey Nature Partnership</b> (1029) Para 16.24 Removal of 'Countryside Partnership's' and addition of '(all of which are affiliated to the Surrey Nature Partnership)'.</li> </ul>	
<p><b>Policy NE1</b></p>	<p><b>Summary.</b> Mainly supportive comments or comments that help us adhere better to relevant legislation. A query was raised by <b>Natural England</b> and two Parish Councils (<b>Elstead</b> and <b>Peper Harow</b>) relating to a difference in the Policy between Thames Basin Heaths and Wealden Heaths SPA but on checking the two avoidance strategies, the difference is valid. A minor modification is suggested in reference to a comment from Southern Water about the permitting of utility infrastructure.</p> <p>National Trust [863] is supportive of this Policy. Keen to work with us to ensure mitigation measures set out in Hindhead Avoidance Strategy implemented. Individual [1052] Support Policy</p> <p>Surrey Wildlife Trust [966] <b>Surrey Nature Partnership</b> [1030] Want to see mention of any other Priority habitats mentioned in NE1(iii)</p> <p><u>Comparison between Wealden Heaths SPA and Thames Basin Heaths SPA Policy wording (NE1/NE3)</u></p> <ul style="list-style-type: none"> <li>[893] <b>Natural England</b> supportive of para 16.28 (they erroneously quote para 16.8. Suggest including mirror-wording in Policy regarding developments over 400m away</li> </ul>	<p><i>NOTED and welcomed</i></p> <p><i>Agree – legal compliance with NERC Act. Accepted as minor mod</i></p> <p><i>DISAGREE – wording related to HRA is included in</i></p>

## Chapter 16 Natural Environment

Key stakeholders here

	<p>from Wealden Heaths SPA in NE1 as in NE3 for Thames Basin Heaths.</p> <ul style="list-style-type: none"> <li>• <b>Elstead Parish Council</b> [1228] Strongly support the objectives of policies NE1 and NE2. However TBH requirements are much more stringent. Amend second paragraph in Policy to identical wording as NE3.</li> <li>• Individual [216] Adopt the Policy for the Thames Basin Heath SPA and apply it for the Wealden Heath SPA -</li> <li>• <b>Peper Harow PC</b> [1241] objects to the Policy as written suggesting the same policies should apply to Wealden Heaths as TBH.</li> </ul>	<p><u>Policy.</u></p> <p><u>Disagree : 400m exclusion zone only relates to TBH SPA as per Policy NRM6, Wealden Heaths requires HRA within 400m.</u></p>
	<p>Developers [1384] and [1473] suggests that the Wealden Heaths has no strategic impact avoidance solution as the provision of SANG. Small applications are unlikely to provide their own SANG and therefore the Plan has not considered the in combination impact on the SPA from developments at Haslemere.</p>	<p>Disagree. Policy NE1 describes the process for HRA for developments within 400m of Wealden Heaths Phase 1 and Phase 2 SPA. Any HRA would need to take account of in combination impact on the SPA in relation to development at Haslemere, and be agreed with Natural England.</p>
	<p><b>Southern Water</b> [1427] <u>Challenging legal compliance and soundness-</u> Policy NE1 is unduly restrictive and could prevent the delivery of essential infrastructure as it does not distinguish between international, national and locally designated sites. Suggest a new clause on essential infrastructure ‘... However, development to provide essential utility infrastructure will be permitted in designated areas in exceptional circumstances if any adverse impacts can be adequately mitigated or compensated’.</p>	<p>Agree: Minor modification suggested to change ‘and’ to ‘or’ and consider splitting Policy into two or three parts.</p>

## Chapter 16 Natural Environment

Key stakeholders here

Para 16.28	<ul style="list-style-type: none"> <li>Also add words 'and agreed' to the final sentence.</li> </ul>	<u>Agree. Accepted as minor mod</u>
<b>Policy NE2</b>	<p><b>Summary:</b> Mainly minor suggestions on wording some of which add clarity to the Policy and others that have been seen as unnecessary additions.</p>	
	<p>Surrey Wildlife Trust (967) and <b>Surrey Nature Partnership</b> (1031) Suggested additional wording to second paragraph 'In addition to the measures mentioned in NE1 above'. Change 'create' to 'achieve' a connected local and regional ecological network.</p>	<u>Agree. Accepted as minor mod</u>
	<p>National Trust [870] Pleased to note WBC have acknowledged importance of River Wey and Godalming Navigations. Suggest the addition of need to respect the historic character of the river corridor (in addition to water quality, ecological value and visual quality) in the Policy wording, and reference to NT's planning guidelines on this matter. Happy to work with WBC on LPP2 policy for River Wey Navigations.</p>	<u>Disagree - Refer to HA1(4) regarding historic character</u>
	<p>Surrey Wildlife Trust made the following suggestions for NE2 [966]...<b>Any</b> new development should <b>attempt to</b> make a positive contribution to biodiversity conservation in the Borough, <b>and the</b> Council will <b>always</b> seek to retain and encourage the enhancement of significant features of nature conservation value on development sites.</p>	<u>Disagree: I don't think these additions are necessary – make no significant change to the Policy.</u>
	<p>[360] POW response- request specific mention of ancient woodland in para 3 of Policy NE2.</p>	<u>Disagree. Woodland encompasses all types.</u>
<b>Supporting text (NE2)</b>	<p><b>Summary:</b> A few minor corrections to statements were made in this section, all of the accurate ones have been</p>	

## Chapter 16 Natural Environment

Key stakeholders here

	incorporated into the minor mods schedule.	
	Surrey Wildlife Trust (967) and <b>Surrey Nature Partnership</b> (1031) Para 16.29 Remove sentence 'Waverley is part of the Thames River Basin District' and replace with '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'.	<u>Agree. Accepted as minor mod</u>
	<b>Chiddingfold Parish</b> [1229] Para 16.29 Suggest inclusion of 'the Arun River basin' in this paragraph.	<u>Disagree - RBDs are defined as part of WFD process, to which this Policy refers.</u>
	Surrey Wildlife Trust (967) Page 16-9 Delivery section. Add 'improvement to existing green infrastructure, incorporating various' to second bullet point. Remove Surrey Biodiversity Partnership, add 'Wey Landscape Partnership' and change to Surrey Nature Partnership.	<u>Agree. Accepted as minor mod</u>
	<b>Peper Harow Parish</b> [1243] Strong support for this Policy.	<u>Noted and welcomed.</u>
<b>SANG Topic Paper</b>	<b>Natural England</b> [904] Para 3.19 change 'private SANG' to 'privately owned SANG' to reflect that the site would be publicly owned.	Noted. Will be included when Topic Paper next updated.
<b>Policy NE3</b>	<b>Summary:</b> A small number of responses relating to issues mainly irrelevant to Local Plans e.g. Brexit and the effectiveness of SANG. An additional SANG site was suggested and two supportive comments were received from a parish council and a neighbouring borough council. One response queried the certainty with which enough SANG can be delivered in Farnham.	
	Surrey Wildlife Trust (968) and <b>Surrey Nature Partnership</b> (1032) Comment relating to EU referendum and potential revocation of EU	<u>Disagree: Not relevant at this stage to make a change.</u>

## Chapter 16 Natural Environment

### Key stakeholders here

	Directives.	
	Resident's Association [1055] The Law demands that convincing evidence is available to confirm that the mitigation measures (SANG) are effective. This evidence has not been made available by Natural England.	<u>Disagree: Not directly our comment to respond to, although as competent authority our mitigation strategies (Avoidance Strategy) and HRAs are approved by NE.</u>
	Gleeson Developments [335] Additional SANG site at Tongham Road, Runfold should be allocated.	<u>Disagree: LPP1 is not allocating SANG.</u>
	<b>Farnham Town Council</b> [532] This Policy is supported – as it repeats Policy FNP12.	<u>Noted and welcomed.</u>
	<b>Rushmoor Borough Council</b> [137] Noted that WBC has recently approved changes to TBH Avoidance Strategy. Rushmoor is keen to work closely with WBC to explore opportunities for the delivery of shared SANG.	<u>Noted and welcomed.</u>
	<b>CPRE</b> [1424] Thames Basin Heaths – No certainty that enough SANG can be delivered in Farnham and so alternative options should be considered to mitigate effects of development on Thames Basin Heaths.	See updated Avoidance Strategy and SANG Topic Paper where sufficient SANG capacity is identified.



## Chapter 17. Climate Change and Flood Risk Management

### Key stakeholders highlighted

Section/ paragraph no./Policy	Key Issues Raised	Council Response
Content – General	<p>No reference made to the possibility of fracking as a form of renewable energy.</p> <p>This resource could have severe implications for areas in close proximity to any proposals.</p> <p>Should be recognition to the impact of these sorts of developments located in neighbouring counties – <i>(Haslemere Town Council)</i></p>	Disagree – Fracking will fall within the responsibility of Surrey County Council.
Policy CC1	<p>Strongly support CC1, CC2, CC3, and CC4 <i>(Elstead Parish Council)</i></p> <p>The local evidence base supports the need for new developments to meet the tighter Building Regulations options of 110 litres per person per day. We welcome your intention to implement this especially as Waverley BC is located in an area of serious water stress. However, the intention in these paragraphs is not including within any of your local plan policies. <i>(Thames Water)</i></p>	<p>Support welcomed.</p> <p>Agree, include 110 litres per person per day in Policy CC2.</p>
	<p>Part 1 of Policy CC1</p> <ul style="list-style-type: none"> <li>is unnecessary since residential development is only required to meet Part L of the Building Regulations.</li> <li>Noted that paragraph 17.29 states that “in implementing Policies CC1 and CC2, the Council will seek to adopt a “fabric first” approach to building design.” Unnecessary and intrusive. Developers can choose to meet Part L through the route they want. This is no longer a planning matter.</li> </ul> <p>Paragraph 17.30: local planning authorities “should not set in their emerging Local Plans Neighbourhood Plans, or supplementary documents, any additional local technical standards or requirements relating to construction, internal</p>	<p>Comment noted:</p> <p>These policies relate both to residential and non-residential. Supporting text and/or policy to be amended to clarify current position in relation to residential development.</p>

## Chapter 17. Climate Change and Flood Risk Management

### Key stakeholders highlighted

	<p>layout or performance of new dwellings". An applicant is not required to demonstrate how s/he has complied with the Council's standards. S/he is only required to meet Part L of the Building Regulations. (<i>Home Builders Federation</i>).</p>	
<b>Policy CC2</b>	<p>Support Policy CC2 Policy can be further strengthened by cross referencing with Surrey Waste Plan Policy CW1: Waste Minimisation and Surrey Minerals Plan; Policy MC4: Efficient use of mineral resources because they have similar objectives.</p> <p>Broadband Provision: Policy CC2 should include an additional measure requiring the provision of broadband facilities for all new development to encourage home working as a driver to reduce the need to travel.</p> <p>Public Health. Policy CC2 seeks to promote design that encourages walking cycling and access to sustainable forms of transport. This policy clearly has the potential to generate positive health and well-being outcomes which are equally relevant to the underpinning principles of sustainable development. This should be included within the document along with reference to the county council's joint strategic needs assessment. (<i>Surrey CC</i>)</p>	<p>Support welcomed. No change. Cross-reference not essential for this Policy.</p> <p>Noted but not considered relevant to this Policy. Could be included in the Local Plan Part 2.</p> <p>Noted. Text could be amended to highlight the related benefits to health and well-being.</p>
<b>Policy CC4</b>	<p>Policy CC4: Flood Risk Management could be amended to make the wording technically accurate and the Policy more effective by adding</p> <ul style="list-style-type: none"> <li>• That Sustainable Drainage Systems (SuDS) will be required on major developments (10 or more dwellings or equivalent) and encouraged for smaller schemes.</li> <li>• A site-specific Flood Risk Assessment required for sites within or adjacent to areas at risk of surface</li> </ul>	<p>Agree. Policy to be amended accordingly.</p>

## Chapter 17. Climate Change and Flood Risk Management

### Key stakeholders highlighted

	<p>water flooding as identified in the SFRA.</p> <ul style="list-style-type: none"> <li>• Should be no increase in either the volume or rate of surface water runoff.</li> <li>• Proposed development on brownfield sites should aim to reduce run off rates to those on Greenfield sites where feasible.</li> <li>• 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 - <b>(Surrey CC)</b>.</li> </ul>	
<b>Policy CC4</b>	<p>The following sentence should be omitted from the CC4: "There should be no increase in either the volume or rate of surface water flooding as identified in the SFRA" and replaced with: "There should be no increase in either the volume (where practicable) or rate of surface water flooding as identified in the SFRA. Where reduction in volume is unachievable due to groundwater or permeability constraints, the runoff volume must be discharged at a rate that does not adversely affect flood risk in line with current best practice".</p>	<p>Disagree – concern that change would reduce the effectiveness of the Policy. However, it is proposed that the wording be changed in line with the amendments proposed by Surrey County Council.</p>
<b>Policy CC4</b>	<p>Supports Policy CC4 - <b>(Godalming Town Council)</b></p>	<p>Support welcomed</p>

## Chapter 17. Climate Change and Flood Risk Management

### Key stakeholders highlighted

<p><b>Strategic Flood Risk Assessment</b></p>	<p>The application of the sequential test for Level 1 showed that it was not possible to accommodate all of the OAHN in areas with lower probability of flooding (i.e. EA Flood Zone 1) The Exception Test can therefore be applied and the Council has commissioned a Level 2 SFRA to assess sites with an element of flood risk. This included an assessment of two sites in Farnham: West of Badshot Lea and Farnham Coxbridge Farm, Farnham It is noted in the assessment of the site in Badshot Lea that there is risk of surface water and sewerage flooding and that the cumulative impact of urban development on the site may increase the risk of surface water flooding.</p> <p>The report makes a number of recommendations and in conclusion both sites were considered to have a relatively low flood risk suitability score. Rushmoor Borough Council supports the recommendations of the Level 2 SFRA in order to prevent cumulative impact of development increasing risk of surface water flooding in this area. <i>(Rushmoor BC)</i></p>	<p>Support welcomed</p>
	<p>Unable to locate and review the floodrisk sequential test documentation and without it, we lack the assurance that your local plan and the proposed allocation of sites are effective, justified or consistent with national planning policy.</p> <p>Paragraph 17.38 notes that ‘the application of the sequential test as part of the level 1 updated showed that it was not possible to accommodate all the objectively assessed development needs in area with lower probability of flooding’ – <i>(Environment Agency)</i></p>	<p>Sequential test documentation is contained in the SFRA alongside relevant information on individual sites in the LAA. Discussion is ongoing with the Environment Agency to ensure that identified concerns have been addressed.</p>
<p><b>Paragraph 17.19; 17.24-27</b></p>	<p>Welcome Para. 17.19; Paras. 17.24-27 and policies CC1&amp; CC2. <i>(Surrey Nature Partnership)</i></p>	<p>Support welcomed</p>
<p><b>Whole Plan</b></p>	<p>Plan appears to be legally compliant and supports Note that Council particularly encourage community-led projects</p>	<p>Support welcomed</p>

## Chapter 18 – Strategic Sites

### Key stakeholders highlighted

Section/ paragraph no./Policy	Key Issues Raised	Council Response
SS1 – Coxbridge Farm, Farnham	<p>Support allocation</p> <ul style="list-style-type: none"> <li>• But would like an extra criterion “subject to meeting criteria of Policy FNP14 of the Farnham Neighbourhood Plan” (Farnham Town Council).</li> <li>• And are confident that housing can be delivered in indicated timescales</li> </ul>	Support welcomed.
	<p>Object to allocation because</p> <ul style="list-style-type: none"> <li>• There is uncertainty on whether the site could support 350 homes. In two ownerships. Site falls within an area identified as ‘high landscape sensitivity’ in AMEC Landscape Study.</li> </ul>	Do not agree that delivery is uncertain. Landscape study indicated that there may be capacity for development in this area.
	Boundaries for site are different to those in Farnham NDP. Yield should be reduced. Site area stated as 14 ha but LAA says it is 12.3 ha.	Agree that site area is wrong. Amend to read: “This 12 hectare site...”
	Site is within 5km of a SPA, yet has not outlined that avoidance and mitigation measures in line with Policies NE1 or NE3 would be required. It is important to cross reference this matter (Natural England).	Noted. Will consider if a cross reference to NE3 is necessary.
	Site is adjacent to Biodiversity Opportunity Area. Development should be required to assist achievement of BOA objectives (Surrey Wildlife Trust & Surrey Nature Partnership)	Noted. This would be considered at the application stage. Will consider if a cross reference to Policy NE1 is needed.
	Significant wastewater infrastructure upgrades are likely to be required to serve the development. Policy should have a condition to ensure the infrastructure is in place ahead of occupation (Thames Water)	Noted. Will need to consider the implications of this requirement for the timing of the delivery of this development.

## Chapter 18 – Strategic Sites

### Key stakeholders highlighted

SS2 – Land West of Green Lane, Farnham	<p>Support allocation</p> <ul style="list-style-type: none"> <li>• but would like an extra criterion “subject to meeting criteria of Policy FNP14 of the Farnham Neighbourhood Plan” (Farnham Town Council).</li> <li>• in principle but suggest change to criterion b) and deletion of c).</li> <li>• but yield is too high. 75 dwellings would be more appropriate.</li> </ul>	Support welcomed. Council will consider if any minor modifications are needed to the Policy but do not agree that yield of 75 would be appropriate.
	<p>Object to allocation</p> <ul style="list-style-type: none"> <li>• because achieving access from Green Lane to adoptable standards would be unlikely.</li> </ul>	Do not agree that access from Green Lane is not achievable.
	<p>Site is within 5km of a SPA, yet has not outlined that avoidance and mitigation measures in line with Policies NE1 or NE3 would be required. It is important to cross reference this matter (Natural England).</p>	Noted. Will consider if a cross reference to NE3 is necessary.
	<p>This site is adjacent to Weybourne Local Nature Reserve where due sensitivity is required during any development (Surrey Wildlife Trust and Surrey Nature Partnership).</p>	Noted. This would be considered at the application stage. Will consider if a reference to Weybourne Local Nature Reserve is needed.
	<p>Wastewater capacity in the area is unlikely to support the demand from the development (Thames Water).</p>	Noted. Will need to consider the implications of this for the timing of the delivery of this development.
SS3 – Woolmead, Farnham	<p>Object to allocation because</p> <ul style="list-style-type: none"> <li>• Provision of underground car park renders site unviable. 100 units above commercial is optimistic and should be reduced to 20 units.</li> </ul>	Do not agree that the requirements of this Policy make the development unviable or that 100 units is optimistic.
	<p>Support allocation but</p> <ul style="list-style-type: none"> <li>• smaller site which lies to the north of Woolmead Road should be omitted from the proposed allocation.</li> <li>• would like an extra criterion “subject to</li> </ul>	Support welcomed. Council will consider if any minor modifications are needed to the Policy.

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	meeting criteria of Policy FNP14 of the Farnham Neighbourhood Plan” (Farnham Town Council).	
	Site is within 5km of a SPA, yet has not outlined that avoidance and mitigation measures in line with Policies NE1 or NE3 would be required. It is important to cross reference this matter (Natural England).	Noted. Will consider if a cross reference to NE3 is necessary.
	Wastewater –capacity of network in the area is unlikely to support the demand from the development (Thames Water).	Noted. However, planning permission for about 100 dwellings has recently been granted on this site.
SS4 – Horsham Road, Cranleigh	Object to allocation because <ul style="list-style-type: none"> <li>do not agree with this 100 house extension of the Crest Estates development.</li> <li>There is insufficient evidence to allocate this site over brownfield sites within the village.</li> </ul>	Do not agree that this site should not be allocated.
	Support allocation <ul style="list-style-type: none"> <li>but do not agree that "Phase 2...must not commence until Phase 1...has been substantially completed".</li> <li>But the proposed access for this development is not satisfactory.</li> </ul>	Support welcomed. Council will consider if any minor modifications are needed to the Policy.
	Question whether site can be completed by 2021.	Do not agree. Promoter has indicated that Phase 2 of site can be delivered early in the plan period.
	Development of 250 domestics is likely to have a significant impact on our gas infrastructure in this location. Should alterations to existing assets be required, they will have to be funded by a developer (Southern Gas Networks).	Noted. Will need to consider the implications of this for the timing of the delivery of this development.
	Wastewater capacity in the area is unlikely to support the demand from the development. Water Supply – network capacity of network in the area is unlikely to support the demand from the	Noted. Will need to consider the implications of this for the timing of the delivery of this development.

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	development ( <b>Thames Water</b> ).	
SS5 – Land South of Elmbridge Rd and High Street, Cranleigh	<p>Object to allocation</p> <ul style="list-style-type: none"> <li>• Site requires new or improved infrastructure which is not proposed.</li> <li>• It has negative effect on rural character of Cranleigh and spoils views.</li> <li>• 500 homes have already been approved and no justification for this additional growth.</li> <li>• It would have impacts on roads, sewage infrastructure, flooding etc.</li> </ul>	Noted. This would be considered at the application stage. Will consider if a cross reference to Policy NE1 is needed.
	Welcome identification of Land at West Cranleigh Nurseries and North of Knowle Park as part of strategic site SS5. Revised application will be in accordance with SS5, but suggest some amendments.	Support welcomed.
	This site includes part of the Biodiversity Opportunity Area R04 (River Wey & tributaries). Development should be required to assist achievement of BOA objectives (Surrey Wildlife Trust and <b>Surrey Nature Partnership</b> ).	Noted. This would be considered at the application stage. Will consider if a cross reference to Policy NE1 should be added to the supporting text.
	Part of site permitted for 500 dwellings should clearly be allocated for housing. Nevertheless, support the refusal of recent application for 265 dwellings. Site is not justified and boundary of SS5 should be amended. ( <b>Cranleigh Parish Council</b> )	Do not agree that the part of the site without a current planning permission should be removed from this application. Although an application on this part was recently refused, it is considered that a suitable scheme can come forward.
	Application for 265 dwellings on part of site recently refused. This will affect delivery timescales as reasons are difficult to overcome.	It is estimated that this part would be delivered in 2021-26. Do not agree that recent refusal of a scheme for 265 dwellings would affect these timescales.
	Wastewater – network capacity in the area is unlikely to support the demand from the development. Water Supply – network capacity of network in the area is unlikely to support the demand from the development. ( <b>Thames Water</b> )	Noted. Will need to consider the implications of this for the timing of the delivery of this development.



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	<p>This strategic sized site comprises three separate promotions and it will be critical for the landowners/promoters to work collaboratively to bring this site to avoid a fragmented and piecemeal development which lacks an integrated cohesive development.</p>	<p>Noted but the Policy does emphasise the need for an integrated scheme for the whole site.</p>
<p>SS6 – Land Opposite Milford Golf course, Milford</p>	<p>Object to allocation as</p> <ul style="list-style-type: none"> <li>• Land lies within the Green Belt and should not be developed. The Green Belt should be protected at all costs!</li> <li>• No exceptional circumstances have been demonstrated.</li> <li>• Allocating it now pre-empts the consideration of the Green Belt as a whole in Local Plan Part Two.</li> <li>• Road infrastructure is not able to cope. Local schools and doctor's surgery are above capacity.</li> <li>• poor access, flooding, loss of 3 holes, traffic problems, loss of greenfield land.</li> <li>• Site is within Flood Zones 2 and 3 and would not pass sequential test</li> <li>• The existing golf course does not hold sufficient land to "replace" the lost three holes. Loss of part of Golf Course would be contrary to LRC1.</li> <li>• There are more sustainable locations which are not in the Green Belt, AONB or AGLV.</li> </ul>	<p>Do not agree that the site should not be allocated in Local Plan Part 1, with the Green Belt boundary amended in Part 2. Do not agree that there would be insurmountable infrastructure problems. More information in relation to this site on the Green Belt and flooding can be seen in the Green Belt Topic Paper and the SFRA.</p>
	<p>Site is within 5km of a SPA, yet has not outlined that avoidance and mitigation measures in line with Policy NE1 would be required. It is important to cross reference this matter (Natural England).</p>	<p>Noted. Will consider if a cross reference to NE1 is necessary.</p>
	<p>This site includes land within Biodiversity</p>	<p>Noted. This would be considered at the application</p>

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	Opportunity Area R04 (River Wey & tributaries) and development here should assist achievement of BOA objectives (Surrey Wildlife Trust and <b>Surrey Nature Partnership</b> )	stage. Will consider if a reference to BOAs/NE1 is necessary.
	Essential to improve transport links around area as part of development. Suggest new road to link development foot/cycle path to improve safety for pedestrians. Suggest drainage improvements. Access issues and junction improvement need to be addressed if site is to be developed safely. ( <b>Witley Parish Council</b> ).	Agree that local highways improvements will be needed, as indicated in the Policy and supporting text.
	Wastewater – no anticipated concerns. Water Supply - network capacity of network in the area is unlikely to support the demand from the development ( <b>Thames Water</b> )	Noted. Will need to consider the implications of this for the timing of the delivery of this development.
SS7 – New settlement at Dunsfold Aerodrome	Support because: <ul style="list-style-type: none"> <li>• I would like scenario 4 from 2014 consultation adopted, i.e. maximum development at Dunsfold. This was favoured by 80% of residents.</li> <li>• The area must embrace the need for a redevelopment of this size, which would be delivered hand in hand with improved infrastructure.</li> <li>• Local businesses and communities will benefit from such a development in the long term.</li> <li>• It would be appropriate to suggest that over 4000 be put at Dunsfold to avoid the negative effects of development elsewhere.</li> <li>• Integrated development like this involving a business park and community facilities</li> </ul>	Support welcomed.  It is not considered it would be possible to deliver more than 2600 dwellings at the site within the plan period (2032).

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	<p>makes a great deal of sense.</p> <ul style="list-style-type: none"> <li>It is a largely unconstrained, 'brownfield' site, capable of delivering a significant amount of required new housing within the plan period</li> </ul>	
	<p>Opposed because of transport/traffic concerns.</p> <ul style="list-style-type: none"> <li>There is existing congestion along the A281 with particular impact on Bramley/Shalford/Guildford.</li> <li>The proposed highways mitigation is inadequate and will not improve the situation.</li> <li>There has to be another road built to take the traffic away from Dunsfold/ Cranleigh, e.g. a bypass onto the A3 from near Dunsfold.</li> <li>Nothing has changed since 2009, when the secretary of state concluded traffic impacts of scheme would be unacceptable.</li> <li>Dunsfold is relatively isolated and, a significant number of residents would have long journeys to and from work.</li> <li>The site is almost entirely surrounded by narrow country lanes, e.g. the B2130 to Godalming.</li> <li>It will result in unsustainable car reliant development.</li> <li>There are no details on the reopening of the Downs Link for a bus service or a new rail link between Cranleigh and Guildford.</li> <li>Not clear how alternative forms of transport will be funded in the long term.</li> </ul>	<p>Do not agree. The transport assessments prepared for the Local Plan suggest that suitable mitigation can be achieved. Details of the main transport schemes are set out in the Infrastructure Delivery Plan.</p>
	<p>Concerns over increased air pollution, vibration and accidents, e.g. particulates from the increase in HGVs.</p>	<p>These concerns are noted but it is considered that these impacts can be addressed and mitigated</p>
	<p>Infrastructure concerns:</p>	<p>These concerns are noted but it is considered that the</p>

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### Key stakeholders highlighted

	<ul style="list-style-type: none"> <li>• site has insufficient physical infrastructure, utilities, and no existing community facilities –</li> <li>• Schools, shops etc. would be unable to cope.</li> <li>• A museum and leisure facilities must be on the site.</li> <li>• The sewage treatment facilities in Cranleigh are at full capacity and without major investment will not cope with further development.</li> <li>• Although a new sewage treatment plant has been proposed for the site, it is unclear where the liquid effluent will be discharged.</li> </ul>	<p>necessary infrastructure, including schools, shops and utilities, can be provided to ensure delivery within the plan period.</p>
	<p>Sustainability concerns:</p> <ul style="list-style-type: none"> <li>• it will never be a 'self-contained' settlement as the area is remote, far from the employment needs of the area, and unsustainable</li> <li>• It will result in widespread impacts for the Surrey Hills AONB, including loss of dark skies and loss of countryside.</li> <li>• Most of the affordable housing would be located where it is not needed. This will not result in a socially inclusive community.</li> <li>• There is no attempt to address the issues of unsustainability raised by the Secretary of State in 2009.</li> <li>• Placing 45% of housing at the southernmost inaccessible end of the Borough, badly served by transport and other infrastructure, does not meet the needs of the Borough.</li> <li>• It fails to locate a significant amount of housing close to sufficient places of employment. Residents will have to travel</li> </ul>	<p>Disagree. It is considered that subject to the necessary infrastructure being provided, including highways improvements, the benefits of redeveloping Dunsfold Aerodrome for housing and other uses outweigh other concerns, including the relatively isolated location of the site.</p> <p>The Sustainability Appraisal Report produced for the Local Plan concluded that the preferred option, which includes 2,600 dwellings at Dunsfold Aerodrome, "on balance represents sustainable development".</p>

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	<p>some distance to reach their place of work.</p> <ul style="list-style-type: none"> <li>• Dunsfold Aerodrome is peppered with Ancient Woodlands and is a haven for endangered species.</li> <li>• WBC erroneously believe that the need for housing, particularly affordable, trumps all adverse elements (including transport impact) on a consideration of the sustainability of DA.</li> <li>• Services at the Royal Surrey, the local hospital, and at local GP practices are already full and could not cope with the additional load.</li> </ul>	
	<p>Is the site brownfield?</p> <ul style="list-style-type: none"> <li>• Dunsfold Airfield is largely greenfield. The vast majority is woodland and beautiful countryside.</li> <li>• The owners are falsely claiming this as a brownfield site.</li> <li>• The description of the land as brownfield land does not mean that all of the land should be developed.</li> <li>• The choice of DA is over reliant on the claim by WBC that a substantial majority of the site (86% or 82%) is previously developed land (PDL).</li> <li>• WBC has consistently and misleadingly applied the adjective 'brownfield' to the site, and used this as its justification for including it as a Strategic Site.</li> </ul>	<p>The Council considers that the site is predominantly brownfield, as explained in para 18.13 and the footnote.</p>
	<p>Deliverability concerns:</p> <ul style="list-style-type: none"> <li>• The Plan relies almost entirely on the deliverability of a single large site, Dunsfold Park.</li> </ul>	<p>Disagree that the Plan is dependent on one site. Disagree that 2600 dwellings at the site cannot be delivered by the end of the plan period. Further evidence will be published on submission of the Plan to</p>

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### Key stakeholders highlighted

	<ul style="list-style-type: none"> <li>• On the basis of current evidence, it is not likely that all 2600 dwellings will be delivered by the end of the plan period.</li> <li>• delivery on the site will not start in 2019 as claimed in the housing trajectory.</li> </ul>	support this.
	<p>Employment issues:</p> <ul style="list-style-type: none"> <li>• The economic potential of Dunsfold Aerodrome, including the Industrial Estate, has been undervalued in the Plan.</li> <li>• This site has always been considered as the prime business opportunity in the Borough and converting it to housing will not support an expanding economy.</li> <li>• The site remains a working airfield, is in good repair and serves a multiple of uses, from annual air shows to filming Top Gear.</li> <li>• DA would have been a good opportunity for “clusters or networks of knowledge driven, creative or high technology industries” as per NPPF para 21.</li> <li>• 26,000 sqm is a considerable expansion (54%) of the current business use at DA - is it all really needed? There should be no B8 use allowed on this site</li> </ul>	It is considered that the retention and expansion of the business park on the site is appropriate, contributing towards meeting the economic development needs of the Borough as explained in the Local Plan. The loss of aviation activities was addressed in the 2009 appeal but was not one of the reasons given by the Secretary of State for its dismissal.
	<p>Consultation flaws:</p> <ul style="list-style-type: none"> <li>• The inclusion of the Dunsfold Park site has been based on a flawed and unrepresentative survey.</li> <li>• 2014 consultation is used as evidence that a majority supported significant development at Dunsfold Aerodrome. In fact the vast majority of residents did not express any such preference.</li> </ul>	Do not accept that the 2014 consultation was flawed. All Waverley residents were consulted. Four scenarios were developed and consulted on, including one without any development at Dunsfold Aerodrome.

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### Key stakeholders highlighted

	<ul style="list-style-type: none"> <li>The public consultation has been biased towards promoting development at Dunsfold Park and the Cranleigh Area.</li> <li>Cranleigh residents do not feel that they have been adequately consulted.</li> </ul>	
	<p>Traffic generated by the development would spoil the relative tranquillity and the character of several ill suited country lanes within the Surrey Hills AONB. The nature of such a large development would also adversely impact upon the setting of the AONB. (Surrey Hills AONB)</p>	<p>The impact on the AONB was addressed in the 2009 appeal but was not one of the reasons given by the Secretary of State for its dismissal. Notwithstanding this, the Council is considering whether to make minor modifications to the Policy and text in order to address these concerns.</p>
	<p>The large scale of the site may lead to an impact on the A3. To confirm that the site is deliverable, proposals must demonstrate the site's impact on the SRN and as necessary provide suitable mitigation in line with Policy ST1. Recommends early dialogue on any emerging mitigation proposals that could directly or indirectly impact the A3. Highways England</p>	<p>Noted. The Council has worked closely with Highways England and the Highway Authority (Surrey County Council) to assess impacts on the A3 and other roads and to consider how these can be addressed. Highways England has responded that they have no objection to the planning application for 1,800 homes at Dunsfold Aerodrome. We will continue to work with Highways England to identify whether 2,600 homes as proposed in the Local Plan will have an additional impact that will required mitigation proposals. There is no evidence that the planned level of growth cannot be accommodated on the highway network.</p>
	<p>Comments from adjoining local authorities:</p> <ul style="list-style-type: none"> <li>Policy does not specify the level of education provision required to mitigate the impacts of proposed development West Sussex County Council.</li> <li>The Council is generally supportive of Dunsfold Aerodrome but request further work is undertaken to establish whether any local transport mitigation is required in Horsham, and if so to ensure that measures are</li> </ul>	<p>Comments are noted. The Council has worked closely with neighbouring authorities to identify and address strategic cross boundary issues under the Duty to Cooperate.</p> <p>The Strategic Highway Assessment (SHA) produced as part of the evidence base for the Local Plan has taken account of external proposals, including Guildford Borough's Draft Local Plan spatial strategy. It has also reviewed the likely cross-boundary impacts of</p>

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	<p>provided accordingly. <b>Horsham District Council</b></p> <ul style="list-style-type: none"> <li>We have ongoing concerns about the additional traffic associated with major development at this site and the impact on the wider road network. <b>Mole Valley District Council</b></li> <li>Support allocation as a previously developed site subject to impacts of development being appropriately mitigated and the new settlement being made sustainable. Highways measures in Guildford shown in the IDP should be contained in the Local Plan itself. <b>Guildford Borough Council</b></li> <li>We remain concerned over the lack of opportunities for alternative forms of transport to the car due to its relatively isolated location and to the ability to adequately mitigate the adverse impacts on the local network. Concern over location of food establishments in relation to schools/children’s playgrounds. It will be important to provide public transport to access hospitals. <b>Surrey County Council</b></li> </ul>	<p>development in Waverley on neighbouring authorities, and what mitigation is required. We will continue to liaise with neighbouring authorities to agree whether there are any cross boundary impacts that require funding from Waverley sites.</p>
	<p>Responses from town and parish councils:</p> <ul style="list-style-type: none"> <li>Object to the scale of development without adequate infrastructure improvements. <b>Compton Parish Council</b></li> <li>Not in principle opposed to a new settlement, but no evidence that this is where new homes are needed. Dispute WBC’s assumption that relatively minor changes to road junctions along A281 will adequately mitigate traffic impacts. Should there be a</li> </ul>	<p>Comments and concerns are noted. The Council has sought to work closely with town and parish councils during the production of the Local Plan.</p> <p>We strongly agree that a range of community and other infrastructure be provided and that a package of highway and sustainable transport measures must be delivered in conjunction with the development.</p> <p>The transport assessments prepared for the Local Plan</p>



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	<p>new settlement, a new major route to the A3 and Guildford from Dunsfold should be provided. <b>Bramley Parish Council</b></p> <ul style="list-style-type: none"> <li>• Concerned about the effect of a new settlement two miles from Cranleigh and requires assurance that infrastructure will be delivered in a timely manner to serve new development in order that there are no adverse consequences on Cranleigh. <b>Cranleigh Parish Council.</b></li> <li>• Support the principle of significant development at Dunsfold, but concerned with the lack of certainty over the delivery of supporting infrastructure. 2,600 homes is the worst possible scenario. Target of 7,000 to 8,000 homes in Dunsfold should be adopted, enough to support a secondary school. <b>Godalming Town Council</b></li> <li>• Object to Dunsfold Aerodrome Strategic Site within the Plan before the issues of sustainability have been addressed. <b>Wonersh Parish Council</b></li> <li>• This will be a very large development and the necessary highways changes are unspecified but appear to only marginally improve the A281 and do nothing for other routes affected. <b>Chiddingfold Parish Council</b></li> <li>• We object to proposals for 2600 homes at Dunsfold Aerodrome, on the grounds of unsuitability of Markwick Lane, one of the main access routes to the site from the A3. <b>Peper Harow Parish Council</b></li> <li>• Strongly objects to Dunsfold Aerodrome,</li> </ul>	<p>suggest that suitable mitigation can be achieved.</p> <p>It is considered that subject to the necessary infrastructure being provided, including highways improvements, the benefits of redeveloping Dunsfold Aerodrome for housing and other uses outweigh other concerns, including the relatively isolated location of the site</p> <p>It is not considered it would be possible to deliver more than 2600 dwellings at the site within the plan period (2032).</p>
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	<p>which is in an unsustainable location. There is no major infrastructure proposed to address problems caused by its isolation, such as new road or rail links. The site provides affordable housing where it is not needed. The residual cumulative transport impacts would be severe. <b>Hascombe Parish Council</b></p> <ul style="list-style-type: none"> <li>• Strongly objects to Dunsfold Aerodrome and disagrees that it can deliver sustainable development. It is in a totally isolated location. <b>Alfold Parish Council</b></li> <li>• We continue to object very strongly to Dunsfold Aerodrome. It should be taken out of the Plan until it is known how and when infrastructure will be delivered. We disagree that "much has changed" since the 2009 appeal decision. It is inappropriate for substantial commercial development. It should not be re-developed solely because it is brownfield. It would have direct adverse impacts on the landscape, particularly views from Hascombe Hill. <b>Dunsfold Parish Council</b></li> <li>• Strongly disagrees that Dunsfold Aerodrome can deliver sustainable development. It is in a totally isolated location. <b>Plaistow and Ifold Parish Council</b></li> <li>• It would be irresponsible to allocate site before it is known whether it can deliver sustainable development. <b>Loxwood Parish Council</b></li> </ul>	
	<p><b>Enterprise M3</b> supports in principle development of Dunsfold as a housing/mixed-use development site.</p>	<p>Support welcomed.</p>

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	We do not believe that major new transport infrastructure is required.	
	<b>Natural England</b> have concerns regarding the large redevelopment of this site and its potential impacts upon the setting of the AONB.	Noted. The impact on the AONB was addressed in the 2009 appeal but was not one of the reasons given by the Secretary of State for its dismissal. Notwithstanding this, minor modifications to the Policy and text will be made in order to address these concerns.
	This 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. Surrey Wildlife Trust and <b>Surrey Nature Partnership</b>	Noted. This would be considered at the application stage. Will consider if a cross reference to Policy NE1 should be added to the supporting text.
	<b>Protect our Waverley</b> asks WBC to delete Policy SS7. The Policy should have included an upper cap on number of homes and on the ultimate size of the industrial development. The Policy is too vague in its requirement for the delivery of infrastructure. The minor highways junction improvements proposed are wholly inadequate to mitigate the negative impacts of traffic generated.	The Policy does include an upper cap of 2600 homes at the site (to be delivered by 2032).  The Policy does provide some general information on infrastructure required for the site, with more detail given in the Infrastructure Delivery Plan (IDP). However, this would be examined in even greater detail at the planning application stage.
	<b>Thames Water</b> would require phasing to ensure water supply infrastructure is in place in time to serve new development. Should the proposed onsite sewage treatment prove not feasible then the alternative is likely to be a connection to the public sewer for which we would have serious concerns. To address uncertainty the developer should produce a detailed drainage strategy.	Noted. It will be important to ensure that the existing utility infrastructure, including water and waste water, are reinforced to the satisfaction of the utility providers. These issues are being considered in detail as part of the current planning application.
	The development would have significant impact on local primary care capacity. There is reference to a new medical centre to support this development.	Noted. The promoters of the site are understood to have proposed a medical centre on the site to serve the new community. However, we will discuss this matter

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	This is not one of the locations that the CCG has been considering to date, and clearly would need further discussion. <b>Guildford and Waverley Clinical Commissioning Group</b>	further with the CCG.
SS8 – Woodside Park, Godalming	<b>Natural England</b> has concerns regarding a large development of over 100 units and its potential impacts upon the setting of the AONB. We recommend that a Landscape and Visual Impact Assessment is commissioned for the site.	Noted. The promoters of the site have produced a detailed LVIA to support their recent planning application, which <b>Natural England</b> did not object to. Notwithstanding this, the Council will consider whether to make minor modifications to the Policy and text to address these concerns.
	This is a previously developed site, part of which falls within the existing Green Belt designation. It also falls within the Area of Great Landscaping Value.	It is agreed that a small part of the site is Green Belt and AGLV, but given that it is previously developed land, it is considered that development proposals have the potential to constitute appropriate development in the Green Belt.
	<b>Godalming Town Council</b> is surprised by the inclusion of Woodside Park as a strategic site and would wish to see employment land retained at that location.	Noted, but the Council considers that a mixed use development is appropriate, subject to the loss of employment space being addressed.
	The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required. We do not envisage concerns regarding wastewater infrastructure capability in relation to this site. <b>Thames Water</b>	Noted. Will need to consider the implications of this for the timing of the delivery of this development.
	There is continued uncertainty about this allocation, which is in employment use. Several recent applications have been refused.	Do not agree. It is considered that the reasons for refusal can be addressed.
SS9 – Land of Water Lane, Farnham (employment site)	It is noted that the Water Lane allocation is on land within the Area of Special Visual Importance (ASVI).	Whilst the site is in the ASVI, it is considered that given the surrounding uses, development would not have a significant impact on the visual amenities of the area.
	<b>Rushmoor Borough Council</b> supports the allocation	Support welcomed.

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	of this site and has no site specific comments to make.	
	Access should include improvement at the roundabout where the B3208 meets the A325 with an extra lane leading on to the Shepherd and Flock roundabout.	The Policy requires the achievement of satisfactory access arrangements to the site, but it may not be necessary or appropriate to require improvements to the wider road network. The general highway improvements in the Farnham area have been investigated in the Mott MacDonald Local Transport Assessment and Addendum report.
	SS9 should reference Surrey Waste Plan Policy WD2(i) as waste management could be an appropriate employment use. <b>Surrey County Council</b>	Noted. The Council will consider if any changes are needed to address this comment. However, making a reference to a potential alternative waste related use on the site could create uncertainty over whether the site is deliverable for Class B uses.
	Wholly support the allocation of strategic employment site. It is in a very sustainable location, close to local amenities, public transport and an excellent road network (A31). <b>Thames Water</b>	Support welcomed.
Suggested additional Strategic Sites	<ul style="list-style-type: none"> <li>• Land West of Petworth Road, Witley for at least 100 homes</li> <li>• Land South of Badshot Lea for up to 630 dwellings, jobs and community facilities.</li> <li>• Lower Weybourne Lane, Farnham for 140 dwellings.</li> <li>• Land off Hale Road, Hale (ID693) for over 100 dwellings.</li> <li>• Waverley Lane, Farnham (ID332).</li> <li>• Secretts, Hurst Farm, Milford for 200 homes.</li> </ul>	<p>Several of these sites have been previously put forward for development but were rejected as a potential strategic site, for various reasons, as set out the LAA. However, new information will be examined in more detail.</p> <p>Completely new sites have been submitted too late for the Local Plan but will be assessed for the next edition of the LAA.</p>
General	Request to add requirement for broadband provision in each of policy SS1-SS8 ( <b>SCC</b> )	This is noted, but this change is considered to be unnecessary given suggested changes to ICS1.
	The Council should consider delivering pitches as part of the delivery of strategic sites (G&T Communities Forum)	Do not agree. This will be considered as part of Local Plan Part 2.

## Chapter 19. Implementation and Monitoring

### Key stakeholders highlighted

Section/ paragraph no./Policy	Key Issues Raised	Council Response
<b>Implementation</b>	<p><b>Plaistow &amp; Ifold Parish Council [1033] &amp; Alford Parish Council [1286]</b>            Fails to demonstrate how practically and financially measures can be put in place to mitigate against impacts on transport.            Fails to ensure that reasonable prospect that planned infrastructure is deliverable in a timely fashion.</p>	<p>Disagree: The IDP demonstrates what infrastructure is required and is being updated through the process. Additionally a CIL schedule is being developed to accompany the submitted Plan.</p>
<b>Implementation</b>	<p>Individual [1126] Recognises the important role of the decision on Dunsfold Aerodrome to the overall delivery of the strategy.</p>	<p>Noted. We are confident that the strategy can be delivered.</p>
<b>Implementation</b>	<p><b>Hascombe Parish Council [1262]</b> Suggest that we will find it difficult to resist inappropriate development on strategic sites allocated in this Plan, but acknowledge that the Local Plan is vital to protect the Borough from inappropriate development. Strongly request that the Council reviews the SHMA or reduces the Plan period to ensure sites can be delivered.</p>	<p>Note concerns but disagree that SHMA needs to be reviewed, and that delivery on allocations constitutes a risk. We are confident that the strategy can be delivered. Plan period cannot be reduced. NPPF states 15 years.</p>
<b>Implementation</b>	<p><b>Chiddingfold Parish Council [1232]</b> No mention is made of enforcement which has been a weakness of Waverley. Particularly important in relation to infrastructure provision for Dunsfold Aerodrome.</p>	<p>Disagree. Enforcement is not a weakness of the planning service. Policy ICS1 coupled with an IDP and CIL charging schedule will ensure that the right infrastructure is delivered for all developments.</p>

## Appendix A: Key Diagram

### Key Stakeholders highlighted

Section/ paragraph no./Policy	Key Issues Raised	Council Response
Key Diagram	Key Diagram omits transverse railway line connecting Shalford with Guildford and Dorking presumably because it lies within Guildford area. The proximity to the area north of Wonersh suggests there could be some housing there. It has access to the A281.	Not agreed. Wonersh is within the Green Belt and not an area which the Green Belt Review recommends for removal.
	Inaccurate in that only A3 is shown as the only trunk road in the borough. While not a Highways England road the A31 which serves Farnham to the west of the borough is normally considered a trunk road. (Busbridge PC)	Disagree – the A31 is not a Trunk Road.
	Key diagram (does not provide the definitive identification of the boundaries of designations such as the Green Belt). (Hambleton PC)	The scale of the Key Diagram prohibits such detail, even though the boundary is accurate. It cannot show more specific detail which is available on the Council's interactive mapping system and will also be available on a detailed Policies Map when the Local Plan is adopted.

## Appendix C: Housing Trajectory

### Key Stakeholders highlighted

Section/ paragraph no./Policy	Key Issues Raised	Council Response
Housing Trajectory	The trajectory is vastly over-optimistic in terms of the quantum of housing it projects the completion of, year-on-year. It is unlikely that completions levels as high as 500+ units can be achieved in Waverley Borough and points to the need to allocate more land for housing.	Disagree. The housing trajectory is considered to be realistic and cautious over when some of the larger sites will be delivered.
	The trajectory says that there is enough housing supply up to 2020-21 without factoring in Dunsfold. The Council should pause on Dunsfold (and on Cranleigh) and look again at alternative sites with better transport infrastructure in place.	Disagree. Dunsfold Aerodrome is anticipated to start to deliver housing from 2019-20, not 2020-21. It is considered that subject to the necessary infrastructure being provided, the benefits of redeveloping Dunsfold Aerodrome outweigh any other concerns.
	Land opposite Milford Golf Club is identified in the trajectory for delivery in years 6-11 as Council are not proposing to amend the Green Belt boundary until Local Plan Part 2. It should be included in the trajectory for the next 5 years. Council state that the trajectory is based on information provided from site promoters as well as a cautious approach. However, it sets out for each different source of supply an average delivery rate across specified years of the plan period. This does not appear to make any allowance for specific site details, developer projections and past delivery of housing in Waverley. As a result the accuracy of the trajectory is questionable. The trajectory appears to be particularly optimistic over the next 5 years in light of past performance.	Disagree that the Green Belt boundary should be amended to remove the Milford Gold Club site in Part 1 of the Local Plan. This is because the precise Green Belt changes for Milford would need further assessment.  The trajectory has taken site promoters' information into account but a cautious approach has been taken in terms of the delivery of some of the larger sites. The delivery for each source (except Dunsfold Aerodrome) has been distributed within each five year period to reflect uncertainties.



## Appendix D: Explanation of the Parish Housing Allocation Figures

Section/ paragraph no./Policy	Key Issues Raised	Council Response
Elstead's allocation	The Weyburn Site, which has a yield of 70, is part of the overall number of 150 for Elstead. However the site is primarily in Peper Harow Parish, not in Elstead. It should be removed from the Elstead list. Peper Harow is a very small rural Parish with limited facilities.	Noted. It is our intention to make it explicit in the plan that the allocation for Elstead assumes delivery on the Weyburn Works site, and we acknowledge that this is partly in Peper Harow parish. (See <u>Minor Mod</u> schedule for Chapter 6 paragraph 6.23).
Farnham	The Farnham entry is objected to because it shows that Council's delivery strategy is already failing as the Farnham Neighbourhood Plan is currently approximately 300 dwellings short and should not be relied upon to deliver the housing required.	Do not agree. The figures for the neighbourhood plan or Local Plan Part 2 to allocate in the table are approximate. The submitted Farnham Neighbourhood Plan does demonstrate how it can meet the target provided for the town in the Local Plan.
Base date	Why is April 1st used as cut off date for allocation figures when many commitments have been made since then e.g. 55 dwellings permitted in Alfold. This is 'playing with figures'. There is a disproportionate allocation of new housing in the east of the Borough.	Disagree. The cut off date of 1 April is used consistently in the Local Plan to reflect the monitoring year (1 April to 31 March). However, the site in question (Land West of Sweeters Copse., Alfold) is included as a suitable LAA site so the figures will have been taken into account in this table.

## Appendix G: Glossary

### Key Stakeholders highlighted

Section/ paragraph no./Policy	Key Issues Raised	Council Response
Biodiversity Opportunity Area	Include a definition of a Biodiversity Opportunity Area. (Surrey Wildlife Trust and <b>Surrey Nature Partnership</b> )	Agreed. Glossary to be amended.
Local Nature Reserve	This definition is hardly adequate ('A habitat of local significance for nature conservation') (Surrey Wildlife Trust and <b>Surrey Nature Partnership</b> )	Agreed. Glossary to be amended.
Sites of Nature Conservation Importance	Locally important sites of nature conservation. These are adopted in local development plan documents. Some further clarification would help here also. (Surrey Wildlife Trust and <b>Surrey Nature Partnership</b> )	Agreed. Glossary to be amended.

## Appendix H: Reference List

Key stakeholders highlighted.

Section/ paragraph no./Policy	Key Issues Raised	Council Response
Housing Land Availability Assessment 2016	Object to inclusion of Land Availability Assessment (LAA) site 400 Land at the rear of Blue Cottage and Penlan, Ewhurst. Fails to consider significance of site in relation to Sayers Croft listed building and non-designated heritage asset. Society is concerned that it will be used as evidence and that the site should be allocated as a non strategic development site in the forthcoming Local Plan Part 2: Non Strategic Policies and Sites and Ewhurst Neighbourhood Plan. Support recommendation of Historic England to make Sayers Croft a conservation area. ( The Twentieth Century Society Comment ID 98)	Concerns noted, however LAA is not the allocation of sites. NDP have a role in the allocation of sites.
Local Plan Consultation Statement 2016	Object to not having been consulted since 2014 consultation. (Adrian Clarke Comment ID 110)	Disagree. It is not necessary to do a Preferred Options consultation. The 2014 consultation satisfies the Regulation 18 requirement.
Environmental	Suggest adding the following: 3. Environmental • Surrey Wildlife Trust (2009) A Living Landscape for Surrey • Surrey Wildlife Trust (2014) Living Landscapes Strategy • Surrey Nature Partnership (2015) Biodiversity Opportunity Areas; the basis for realising Surrey's ecological network • HM Government (2011) The Natural Choice: Securing the value of nature (Surrey Wildlife Trust Comment ID 980 and Surrey Nature Partnership Comment ID 1042)	Disagree. These documents were not used to write the plan and therefore should not be referenced. Could be used for LPP2.

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# Annexe 2

Waverley Borough Council  
Local Plan Part 1  
Pre - Submission

Schedule of proposed  
minor modifications

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## Chapter 1: Introduction and Context

Mod No.	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 (inc rep no. as appropriate)
	1-4	New paragraph 1.21	<b>Local Nature Partnerships 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.</b>	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)
	1-4	1.21	Re-number to become para 1.22.	As a consequence of above.	

## Chapter 2: Spatial Portrait

Mod No.	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 (inc rep no. as appropriate)
	2-8	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, <b>including those of Gypsies, Travellers and Travelling Showpeople</b> can be found in Chapter 9.'	Clarity	Surrey Gypsy and Traveller Communities Forum (Comment ID 874)
	2-9	2.34	Amend last line to read: '.....affect Waverley include Whitehill/Bordon <del>'Eco Town'</del> 'green town', the .....	Factual correction	East Hants District Council (Comment ID846)
	2-10	2.40	Insert new line. '....Frensham Common. <b>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.</b> Other facilities include.....'	This wording was included at the request of the South Downs National Park in the Spatial Strategy of the withdrawn Core Strategy, but has not been included in the new Local Plan.	The Haslemere Sociey (Comment ID 884)



## Chapter 3- Spatial vision

Mod No.	Document Page no.	Para/ Policy	Modified text (deleted text shown as <del>struck through</del> and additional text shown in bold)	Reason for modification	Source of modification (inc rep no. as appropriate)
	Page 3-1	5	Add in reference to Cultural Strategy 2016-2026 when fully adopted in the New Year.	To include reference to additional key WBC strategy.	(Farnham Theatre Association, 1095)
	Page 3-1	5	Final sentence '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, <b>health and</b> cultural needs of the community'.	A fuller description of the needs of a community recognising the importance of health.	Guildford and Waverley Clinical Commissioning Group, (1398)
	Page 3-2	12	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 <b>and where necessary compensated</b> '.	Accuracy	(Surrey Wildlife Trust, 940); (Surrey Nature Partnership, 1002)

## Chapter 4 Local Plan Objectives

Mod No.	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 (inc rep no. as appropriate)
	Page 4-2	12	Amend end of paragraph to .....including older people, first time buyers <del>and</del> <b>gypsies, travellers and travelling showpeople.</b>	Minor wording changes to identify the needs of the travelling community	Surrey Gypsy and Traveller Communities Forum, 878).
	Page 4-2	16	'To safeguard and enhance the <del>rich</del> historic heritage and the diverse <del>and attractive</del> 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]

## Chapter 5 Spatial Strategy

Mod No.	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 (inc rep no. as appropriate)
	5-3	Para 5.10	(including villages like Alfold <del>(including Alfold Crossways)</del> and Ewhurst).	In line with Settlement Hierarchy	Cove Construction [559] & [563]
	5-5	Para 5.21	Include a new bullet point; ' <b>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.</b> '	Accuracy – adds important context to Dunsfold aerodrome.	Dunsfold Airport Limited [1386]
	5-6	Para 5.23	'and other strategic sites <del>(defined as sites capable of delivering 100 dwellings or more)</del> .	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]
	5-7	SP2	Amend SP1 criterion 1 - "avoid major development on land of the highest amenity <del>and landscape value...</del> ".	Accuracy and compliance with NPPF para 115.	Farnham TC [512) Developer [1304].
	5-7	SP2	Point 3 should read ' whilst recognising that <del>due to Green Belt and other constraints</del> <b>the Green Belt Review recommended that</b> Bramley <b>remains washed over and therefore</b> has more limited scope for development'	Elstead PC wanted recognition of Elstead's limited development scope in this clause, but there is more scope here due to the GB Review. Suggested wording help explains	Elstead PC [1193]

Chapter 5 Spatial Strategy

				why Elstead is not specifically mentioned in this final clause.	
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## Chapter 6 Amount and Location of Housing

Mod No.	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 (inc rep no. as appropriate)
	Page 6-3	Para 6.13	Whilst some improvements to infrastructure will be required, the evidence indicates that there are no <del>fundamental</del> <b>insurmountable</b> issues arising from the growth planning in Waverley.	Recognises that infrastructure issues (transport, water quality) are significant.	DWL Associates [1311]
	Page 6-5	Para 6.23	Add final sentence. <b>'The allocation for Elstead assumes delivery of the Weyburn Works site, which is partially in Peper Harow parish'</b> .	Accuracy	Peper Harow Parish Council [1235].

## Chapter 7 Sustainable Transport

Mod No.	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 (inc rep no. as appropriate)
	7-4	7.21	<p>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, <del>if the scheme is approved with funding agreed, construction is unlikely to start until 2024 at the earliest, with completion by 2027</del> improvements will be made to the A3 within the next RIS period for 2020–2025.</p>	<p>Guildford Borough Council has received updated information from Highways England on the likely earliest construction commencement for this scheme.</p>	814

## Chapter 8: Infrastructure and Community Services

Mod no.	Document Page no.	Para/Policy	Modified text (deleted text shown in struck through and additional text shown in bold)	Reason for modification	Source of modification (incl. rep no. as appropriate)
	8-3 – 8-4	Para. 8.15	<p>Rewording of para. 8.15 as: “<i>Along with physical and social infrastructure, <b>Green Infrastructure</b> (‘GI’) plays a key part in place-shaping. GI is a <b>conceptual</b> network of multi-functional open spaces, <b>designed and managed to best meet society’s demands of its environment, underpinning quality of life issues but also supporting biodiversity. It will also be central in climate change adaptation by... and create <b>wildlife</b> corridors for the migration of species.</b></i>”</p> <p>Policy ICS1: Infrastructure &amp; Community Services 2. “...<i>the provision of SANG will be prioritised as items of essential <b>Green Infrastructure</b> to avoid...</i>”</p>	Clarity and accuracy	Surrey Wildlife Trust
	8-2	Para. 8.8	Amend second line of paragraph to read: “.....proportion of the CIL charge <b>would</b> need to be set aside (‘top-sliced’) to provide .....	To be consistent with wordings in Policy ICS1(2)	Natural England
	8-4	Policy ICS1(1)	Amend policy ICS1(1) to read: Infrastructure considered necessary to support new development must be provided either on- or off-site or by the payment of financial contributions through planning obligations, <b>planning conditions</b> and/or the Community Infrastructure Levy	To add that planning condition may be required	Southern Water

## Chapter 9 Affordable Housing and Other Housing Needs

Mod No.	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 (inc rep no. as appropriate)
	9-4	AHN1	On developments <b>in rural areas</b> where the net number of dwellings is fewer than 11 dwellings, the contribution may be in the form of a <b>cash payment</b> <del>financial contribution</del> equivalent to..."	Minor wording changes to respond to representation to accord with wording in the NPPG.	(Bargate Homes Ltd, 1013); (Oakford Homes, 952); (Godalming Town Council, 1140); (Michael Conoley Associates, 984); (Home Builders Federation, 897).
	9-13	Para 9.49	Policy AHN4 therefore sets out the framework for identifying and allocating Traveller and Travelling Showpeople sites, including <b>rural exception sites</b> 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)
	9-14	AHN4	Traveller sites in the Green Belt will not be supported, except in very special circumstances.  <b>Rural Exception Sites solely for affordable gypsy, travellers and traveling showpeople sites will be considered in accordance with Policy D of the Planning Policy for Traveller Sites.</b>  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 traveller sites.	(Surrey Gypsy and Traveller Communities Forum, 881)
	9-14	AHN4	Allocations or proposals for permanent and transit sites for Gypsies, Travellers and Travelling Showpeople will only be permitted if:	Minor deletion of wording to respond to representations to	(Guildford Borough Council, 813); (Surrey Gypsy and Traveller Communities



## Chapter 9 Affordable Housing and Other Housing Needs

			<ul style="list-style-type: none"><li>• they are necessary in order to meet the requirements of an appropriate assessment of need;</li><li>• safe and convenient vehicular and pedestrian access to the site can be provided.....</li></ul>	align approach to traveller accommodation with other housing	Forum, 883)
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## Chapter 10 Employment and the Economy

Mod No.	Document Page no.	Para/ Policy	Modified text (deleted text shown as <del>struck through</del> and additional text shown in bold)	Reason for modification	Source of modification (inc rep no. as appropriate)
	10-8	Policy EE2	Add to final paragraph ..... <b>and the provisions of Policy WD2 of the Surrey Waste Plan 2008 or equivalent adopted policies in a New Surrey Waste Plan 2018-2033</b>	Wording added to clarify position with waste management uses	SCC 834
	Throughout		Replace all <del>Local Economic Partnership</del> with <b>Local Enterprise Partnership</b>	Minor wording change needed as a correction	(Enterprise M3 LEP 869)

## Chapter 11: Town Centres and Shopping

Mod No.	Document Page no.	Para/ Policy	Modified text (deleted text shown as <del>struck through</del> and additional text shown in bold)	Reason for modification	Source of modification (inc rep no. as appropriate)
	11-7	Policy TCS1: Town Centres	Rewording of 2 <sup>nd</sup> sentence: Applications for main town centre uses should be located in <b>the town centres of Farnham, Godalming, Haslemere and Cranleigh.</b>	Clarity	Farnham Town Council (Comment ID 524)
	11-10	11.42	Amend last sentence ...community value of <del>Exiting existing</del> services and facilities....	Typo	
	11-10	Policy TCS3: Neighbourhood and Village Shops	Remove first bullet pointed sentence from paragraph 11.42 and insert new sentence at the beginning Policy TCS3 to read: <b>'The Council will support the provision of small-scale local facilities to meet local needs.</b> Where planning permission..."	Clarity	Thakeham Homes (Comment ID 927)

## Chapter 12. Leisure, Recreation and Culture

Mod No.	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 (inc rep no. as appropriate)
	12-2	12.9	Amend paragraph: '...Devil's Punchbowl at Hindhead. <b>Waverley also has a number of designated national and local nature reserves.</b> There is a high...'	Additional factual information included.	Surrey Wildlife Trust (Comment ID 949) and Surrey Nature Partnership (Comment ID 1025)
	12-3	12.12	Amend para to read: <del>Detailed criteria for</del> <b>Guidance to assist in</b> designating....	Clarity	Godalming Town Council (Comment ID 1145)
	12-7	LRC1: Leisure, Recreation and Cultural Facilities	Amend the second paragraph of Policy LRC1: 'The Council will seek to secure the provision of new pitches or contributions towards improvements to existing pitches taking account of the <b>current</b> local standards set out in Table 2, <b>or in accordance with the most up to date assessment</b> to ensure....'  Amend the last paragraph of policy to read: 'The Council will encourage the provision of new open space, sports, leisure, <b>cultural</b> and recreation facilities.....'  Amend the last paragraph: 'the Waverley Playing Pitch Strategy March 2013; the Waverley Play Area Strategy 2015 – 2024; <b>the draft Cultural Strategy and any subsequent updates</b> , provided...'	The Council is intending to review its Playing Pitch Strategy during 2017. It is also intending to produce a Leisure Strategy and its Cultural Strategy is in advanced stages of production. As such, there is the need to allow for the policy to be applied more flexibly, taking account of the findings of any future strategies that might be produced during the plan period.	Waverley Greenspaces Manager by email. Farnham Theatre Association (Comment ID 1094)
	12-7	LRC1: Leisure, Recreation and Cultural Facilities	Amend point c) to read: 'alternative provision of a suitable scale and type, <b>and in a suitable location</b> can be made'		Godalming TC (Comment ID 1146)

## Chapter 12. Leisure, Recreation and Culture

	12-7	LRC1: Leisure, Recreation and Cultural Facilities	Amend first sentence of final paragraph of the policy to read Where a need arises for new or improved facilities as a direct result of development...”	Typo.	WBC
	12-7 and 12-8	Delivery. 2 <sup>nd</sup> bullet point	Amend paragraph: <ul style="list-style-type: none"> <li>The greening of the environment, improvements <b>in accessing the natural environment and to existing green infrastructure, incorporating various</b> biodiversity enhancements to be undertaken in partnership with various organisations such as the Waverley Countryside Service, <b>the Surrey Nature Partnership</b>, Wey Landscape Partnership, Action for Wildlife, Blackwater Valley Countryside Partnership and the Surrey Heathland Project. <b>and the Surrey Biodiversity Partnership.</b></li> </ul>	Clarity and accuracy.	Surrey Wildlife Trust (Comment ID 949)

## Chapter 13. Rural Environment

Mod No.	Document Page no.	Para/ Policy	Modified text (deleted text shown as <del>struck through</del> and additional text shown in bold)	Reason for modification	Source of modification (inc rep no. as appropriate)
	13-1	13.1	Amend wording to read: Para. 13.1 “Waverley has some of the most attractive and unspoilt countryside in Surrey. <b>This</b> high quality environment is one of the Borough's greatest assets and makes a significant contribution to giving Waverley its distinctive character, <del>This character</del> , formed over <b>many hundreds</b> of years through the activity...”	To improve readability.	Surrey Wildlife Trust (ID Comment 951)
	13-2	Policy RE1	Amend wording to read: Policy RE1 ‘.....the intrinsic <b>character and</b> beauty of the countryside.....’	Accuracy	Hurtwood Park Polo Club (Comment 1429)
	13-3	13.12	Amend wording of first sentence to read: ‘This piece of land is predominantly in agricultural use <b>and is also within an Area of Great Landscape Value (AGLV)</b> . It helps....’	Accuracy	Surrey Hills AONB Board ( ID Comment 657)
	13-4	13.14	Add new second sentence to read: The site is <b>within an Area of Great Landscape Value (AGLV)</b> .	Accuracy	Surrey Hills AONB Board ( ID Comment 659)
	13-5	13.17	Add new sentence at the end of the paragraph to read: <b>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.</b>	Accuracy	Surrey Hills AONB Board ( ID Comment 660)
	13-13	Policy RE2	Amend third paragraph of policy to read: ‘Certain forms of development are <del>not</del> considered to be <del>inappropriate</del> <b>appropriate</b> in	To improve readability.	Twist Homes (ID Comment 327)

## Chapter 13. Rural Environment

			the Green Belt.'		
	13-14	13.32	Amend wording to read: '...sets out the vision, <b>aims, objectives,</b> policies and plans for the management of the AONB.'	Accuracy	Natural England (ID Comment 905)
	13-15	13.40	Should be <del>Waverley Borough</del> <b>set</b> against....	Typo	
	13-20	Policy RE3	Amend wording to read: Surrey Hills Area of Outstanding Natural Beauty <del>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.</del> <b>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....'</b>	Accuracy	Surrey Hills AONB Board (Comment ID 655)

## Chapter 15. Heritage Assets

Mod No.	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 (inc rep no. as appropriate)
	15-1	15.4	Factual change to para 15.4 to include Haslemere town centre. Add ' <b>Haslemere</b> ' in the bullet point list.	No mention of the Haslemere town centre Conservation Area Appraisal which was adopted by WBC on 14th October 2014.	Individual
	15-3	Delivery	Keeping and reviewing a local register of <del>buildings</del> <b>heritage assets</b> at risk or vulnerable to risk.	Greater clarity that other heritage assets will be monitored for risk.	Surrey Gardens Trust (ID25)
	15-1	15.1	...with <del>some 1,741</del> <b>over 1700</b> listed structures,	No. is already out of date and will probably change again before adoption	WBC
	15-1	15.4	<b>As of 19<sup>th</sup> July 2016</b> Conservation Area Appraisals have been undertaken....	For clarity	WBC
	15.1	15.1	... <del>eight</del> <b>nine</b> Registered Parks and Gardens	No. is out of date but is not likely to change before adoption	WBC



## Chapter 16 The Natural Environment

Mod No.	Document Page No	Para/ Policy	Modified text (deleted text shown as <del>struck through</del> and additional text shown in bold)	Reasons for modification	Source of modification (inc rep no. as appropriate)
	16-1	16.4	<p>The Thames Basin Heaths SPA covers an area of 8275 ha across Hampshire, <b>(the former county of)</b> Berkshire and Surrey. It is part of a complex of heathlands in <del>southern</del> Southern England that support important populations of breeding birds <b>together support a significant proportion of the global breeding populations of three vulnerable and uncommon birds</b>, including the Dartford Warbler, Nightjar and Woodlark.</p> <p>The Thames Basin Heaths Avoidance Strategy sets out the Council's approach in seeking to avoid the effect of a <del>the recreational impacts on the SPA from any</del> 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.</p>	Minor wording changes for clarity.	Surrey Wildlife Trust (956)
	16-1	16.5	<p>There are two other SPAs in Waverley, Wealden Heaths Phase I (Thursley, Hankley and Frensham <b>SSSI</b>) and Wealden Heaths Phase II (Devil's Punch Bowl <b>SSSI</b>), <b>both selected for similar conservation reasons as the Thames Basin Heaths SPA.</b></p> <p>Within this chapter, Policy NE1(i) refers to the impacts of development on the Wealden Heaths Phase I &amp; II SPAs and Policy NE3 deals specifically with the Thames Basin Heaths SPA.</p>	Minor wording changes for clarity.	Surrey Wildlife Trust (956)
	16-3	16.13	<p>Para. 16.13. "...They are also important for their biodiversity, as <b>intrinsic</b> wildlife habitats and in</p>	Minor wording changes for clarity.	Surrey Nature Partnership [1028]

## Chapter 16 The Natural Environment

			connection of <del>as part of</del> interconnected "green corridors".		
16-4	16.16	Para. 16.16. "Canals and river corridors are examples of valuable 'wildlife corridors' or <del>connections</del> <b>providing connections within and</b> between a network of habitats across the Borough. ....In addition, the wider network of <b>smaller watercourses and tributaries</b> needs to be acknowledged.	Minor wording changes for clarity.	Surrey Nature Partnership [1028]	
16-4	16.17	Waverley's landscape has a distinctive wooded character, with over 10,000 hectares of woodland; ; 32% of the borough.	Minor wording changes for grammar.	Surrey Nature Partnership [1028]	
16-5	16.22	Cranleigh <del>Woods</del> Woodlands Thursley, Hankley & Frensham <del>Heaths</del> Commons ( <b>including</b> Wealden Heath SPA Phase I) Devil's Punch Bowl & Hindhead <del>Heaths</del> Common ( <b>including</b> Wealden Heath SPA Phase I)	Minor wording changes for accuracy.	Surrey Wildlife Trust (963) and Surrey Nature Partnership (1029)	
16-6	16.23	Prior to 2012, the Surrey Biodiversity Partnership implemented the Surrey Biodiversity Action Plan. <b>This plan has now been withdrawn and</b> the partnership <b>now</b> operates as the Biodiversity Working Group of the Surrey Nature Partnership.  The following priority habitats are relevant to Waverley: Farmland Floodplain Grazing Marsh Heathland Meadows	Minor wording changes for accuracy.	Surrey Wildlife Trust (963) and Surrey Nature Partnership (1029)	

## Chapter 16 The Natural Environment

			<p>Open Water and Reedbeds  <del>Wetland</del>  <del>Woodland</del>  <del>Wood Pasture and Parkland</del>  <del>Road Verge</del>  <b>Lowland heathland</b>  <b>Lowland dry acid grassland</b>  <b>Lowland meadows</b>  <b>Lowland calcareous grassland</b>  <b>Mixed deciduous woodland</b>  <b>Beech &amp; Yew woodland</b>  <b>Wet woodland</b>  <b>Wood-pasture &amp; parkland</b>  <b>Lowland fen</b>  <b>Reedbeds</b>  <b>Floodplain grazing marsh</b>  <b>Rivers</b>  <b>Standing open water-bodies</b>  <b>Ponds</b>  <b>Hedgerows</b>  <b>Arable field margins</b>  <b>Traditional orchards</b>  <b>Inland rock outcrop &amp; scree habitats</b>  <b>Open mosaic habitats on previously developed land</b></p>		
	16-7	16.24	<p>The Council works in partnership with other conservation projects, such as the Amphibian and Reptile Conservation Group, the <del>Countryside Partnership's</del> Surrey Heathland Project and the Blackwater Valley Countryside Partnership, and aims to conserve and enhance valuable habitats in Waverley.</p>	Minor wording changes for accuracy.	Surrey Wildlife Trust (963) and Surrey Nature Partnership (1029)
	16-8	NE1	<p>(iii) Sites of Nature Conservation Importance (SNCI), Local Nature Reserves (LNR), Local Geological Sites and other Ancient Woodland,</p>	Addition of any other Priority habitats (NERC Act)	Surrey Wildlife Trust [966] Surrey Nature Partnership [1030]

## Chapter 16 The Natural Environment

			Ancient and Veteran Trees; <b>or any other Priority habitats</b> not identified within (ii) above.		
	16-8	NE1	Within locally designated sites, development will not be permitted unless it is necessary for appropriate on site management measures <del>and</del> <b>or</b> 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]
	16-9	Para 16.28	Further advice should be sought <del>from and agreed with</del> Natural England.	Minor wording changes for clarity.	Natural England (893)
	16-9	Policy NE2	<b>'In addition to the measures mentioned in NE1 above</b> , new development should make a positive contribution to biodiversity by creating or reinforcing linkages between designated sites, in order to <del>create</del> <b>achieve</b> 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)
	16-9	Para 16.29	<del>Waverley is part of the Thames River Basin District</del> <b>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.</b>	Minor wording changes for accuracy.	Surrey Wildlife Trust (967) and Surrey Nature Partnership (1031)
	16-9	Delivery	<del>Improvements to existing green infrastructure, incorporating various biodiversity enhancements to The greening of the environment, improvement in biodiversity and enhancements of the existing green infrastructure will</del> be undertaken in partnership with various organisations such as the Waverley Countryside Service, <b>the Surrey Nature Partnership, Wey Landscape Partnership</b> , Action for Wildlife, Blackwater Valley Countryside Partnership and the Surrey Heathland Project. <del>and the Surrey Biodiversity Partnership.</del>	Minor wording changes for accuracy.	Surrey Wildlife Trust

## Chapter 17: Climate Change and Flood Risk Management

Mod no.	Document Page no.	Para/Policy	Modified text (deleted text shown as struck through and additional text shown in bold)	Reasons for modification	Source of modification (incl. rep no. as appropriate)
	17-6	Policy CC2	Add to the end of Policy CC2: <b>“8. New dwellings shall be required to meet with the requirement of 110 litres per person per day”</b>	To be in line with the National Planning Practice Guidance (Para. 014; revised March 2015).	The Environment Agency.
	17-6	Policy CC2 (3)	Create a new paragraph 17.31 and add: <b>“In addition to addressing sustainable design and construction, Policy CC2 has potential to support improved health and well-being”</b> .	To emphasise the implication of walking, cycling, and access to sustainable forms of transport to health and well being.	Surrey County Council
	17-6	17.30	Add to the end of paragraph 17.30 <b>“The Council acknowledges that government has said Local Plans should not set any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings”</b> .	To be consistent with Government stated requirements	House Builders Federation
	17-9	CC4 (2)	Amend Policy CC4 (2) to read: “Sustainable Drainage Systems (SuDS) will be required on major developments (10 or more dwellings <b>or equivalent</b> ) and encouraged for smaller schemes. A site-specific Flood Risk Assessment required for sites within or adjacent to areas at risk of	To make wording to be technically correct.	Surrey County Council

			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 <b>Greenfield</b> sites <b>where feasible</b> ".		
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## Chapter 18: Strategic Sites

Mod No.	Document Page no.	Para/ Policy	Modified text (deleted text shown as <del>struck through</del> and additional text shown in bold)	Reason for modification	Source of modification (inc rep no. as appropriate)
	18-2	18.4	In first sentence, delete “14 hectare” and replace with “ <b>12 hectare</b> ”.	Factual error.	Wates Developments Limited (ID1462)
	18-2	18.4	After the penultimate sentence, add new sentence: “ <b>Avoidance and mitigation measures in line with Policies NE1 or NE3 would be required.</b> ”	Cross reference to add clarity.	Natural England (ID894)
	18-2	18.4	After the penultimate sentence, add a new sentence: “ <b>The site is also adjacent to Biodiversity Opportunity Area R04, River Wey &amp; Tributaries and development should assist achievement of BOA objectives (see Policy NE1).</b> ”	Cross reference to add clarity.	Surrey Wildlife Trust (ID971) & Surrey Nature Partnership (ID1036)
	18-4	18.5	Amend the third sentence to read: “The site lies within 5km of the Thames Basin Heaths SPA <b>and avoidance and mitigation measures in line with Policies NE3 would be required.</b> ” Amend the subsequent sentence to read “ <del>p</del> Part of the site...”	Cross reference to NE3 to add clarity.	Natural England (ID895)
	18-4	18.5	Add new sentence after “... Strategic Gap”: “ <b>This site is adjacent to Weybourne Local Nature Reserve where due sensitivity is required during any development (see Policy NE1).</b> ”	Cross reference to NE1.	Surrey Wildlife Trust (ID973) & Surrey Nature Partnership (ID1037)
	18-6	18.6	Amend the third sentence to read: “The site lies within 5km of the Thames Basin Heaths SPA <b>and avoidance and mitigation measures in line with Policies NE3 would be required.</b> ” Amend the subsequent sentence to read “ <del>and</del> It is partly within an area of High Archaeological Potential”.	Cross reference to NE3 to add clarity.	Natural England (ID902)

## Chapter 18: Strategic Sites

	18-6	18.6	Amend final sentence to read <b>“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.”</b>	Factual update.	
	18-10	18.9	At end of paragraph, add new sentence: <b>“This site includes part of the Biodiversity Opportunity Area R04 (River Wey &amp; tributaries) and development should assist achievement of BOA objectives (see Policy NE1).”</b>	Cross reference to add clarity.	Surrey Wildlife Trust (ID975) & Surrey Nature Partnership (ID1038)
	18-13	18.11	Add text after 2 <sup>nd</sup> sentence: <b>“Due to its proximity to the SPA, a project-level HRA assessment is likely to be required to ensure that no likely significant effect would result, in accordance with Policy NE1”</b>	The on-line version of the plan included a 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.	Natural England (ID903)
	18-13	18.11	After new third sentence, add: <b>“This site includes land within Biodiversity Opportunity Area R04 (River Wey &amp; tributaries) and development should assist achievement of BOA objectives (see Policy NE1).”</b>	Cross reference to add clarity.	Surrey Wildlife Trust (ID976) & Surrey Nature Partnership (ID1039)
	18-15	18.13	Add after second sentence: <b>“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. “</b>	To address key stakeholder representation regarding potential impacts on the AONB.	Natural England (ID908)



## Chapter 18: Strategic Sites

	18-15	18.13	Add sentence after “is encouraged”: <b>“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).”</b>	Further detail and cross reference to add clarity.	Surrey Wildlife Trust (ID978) & Surrey Nature Partnership (ID1040)
	18-18	Policy SS7	Amend criterion i) to read: <b>““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”</b>	To address representation from highways authority and to provide clarification.	Surrey County Council (ID821)
	18-18	Policy SS7	Amend criterion j) to read: <b>“A package of sustainable transport measures, including a bus service to be provided and secured in perpetuity for this site, to maximise opportunities for alternative forms of transport and to support alternatives to the private car”.</b>	To address representation from highways authority and to provide clarification.	Surrey County Council (ID821)
	18-18	Policy SS7	Add a new sentence after criterion l) <b>“The development must protect the setting of the nearby Surrey Hills Area of Outstanding Natural Beauty, in accordance with Policy RE3.”</b>	To address key stakeholder representation regarding potential impacts on the AONB.	Natural England (ID908)
	18-22	18.27	Renumber paragraph number for the Water Lane site from 18.27 to 18.28.	Typo.	
	18-22	18.27	Add after third sentence: <b>“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.”</b>	To address waste planning authority’s representation regarding appropriate uses on this site.	Surrey County Council (ID841)

**Appendix D: Explanation of Parish Housing Allocations for Policy ALH1**

Mod No.	Document Page no.	Para/ Policy	Modified text (deleted text shown as <del>struck through</del> and additional text shown in bold)	Reason for modification	Source of modification (inc rep no. as appropriate)
	D-1		In last column of table, amend header to read “ <b>Approximate no.</b> <del>No.</del> of homes to allocate in Neighbourhood Plan or Local Plan Part 2”	For clarification as these numbers are approximate only.	

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## Appendix G: Glossary

Mod No.	Document Page no.	Para/ Policy	Modified text (deleted text shown as <del>struck through</del> and additional text shown in bold)	Reason for modification	Source of modification (inc rep no. as appropriate)
	G-3		<p>Insert after Biodiversity Action Plan (BAP)</p> <p><b>Biodiversity Opportunity Area (BOA)</b></p> <p><b>Areas where conservation action, such as habitat creation, restoration or expansion, is likely to have the greatest benefit for biodiversity. They are centred on existing areas of biodiversity interest, but have a key role as areas which offer strategic opportunities for biodiversity enhancement.</b></p>	Lack of definition	Surrey Wildlife Trust and Surrey Nature Partnership (ID Comments 979 and 1041)
	G-8		<p>Replace definition for Local Nature Reserve (LNR).  <del>A habitat of local significance for nature conservation.</del></p> <p><b>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.</b></p>	Inadequate definition	Surrey Wildlife Trust and Surrey Nature Partnership (ID Comments 979 and 1041)
	G-11		<p>Replace definition for Sites of Nature Conservation Importance (SNCI)</p> <p><del>Locally important sites of nature conservation. These are adopted in development plan documents.</del></p> <p><b>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 (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.</b></p>	Further clarification needed	Surrey Wildlife Trust and Surrey Nature Partnership (ID Comments 979 and 1041)

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## Glossary of Abbreviations and Acronyms

<b>5YHLS</b>	Five Year Housing Land Supply
<b>AGLV</b>	Areas of Great Landscape Value
<b>AONB</b>	Area of Outstanding Natural Beauty
<b>AQMA</b>	Air Quality Management Area
<b>BOA</b>	Biodiversity Opportunity Areas
<b>CAMRA</b>	Campaign for Real Ale
<b>CBRE</b>	CBRE (commercial property consultants)
<b>CCG</b>	Clinical Commissioning Group
<b>CIL</b>	Community Infrastructure Levy
<b>CPRE</b>	Campaign to Protect Rural England
<b>DA</b>	Dunsfold Aerodrome
<b>DCLG</b>	Department for Communities and Local Government
<b>dpa</b>	Dwellings per annum
<b>DtC</b>	Duty to Cooperate
<b>FVAG</b>	Frensham Vale Action Group
<b>GB</b>	Green Belt
<b>GBC</b>	Guildford Borough Council
<b>GI</b>	Green Infrastructure
<b>HBF</b>	House Builders Federation
<b>HGV</b>	Heavy Goods Vehicle
<b>HLS</b>	Housing Land Supply
<b>HMA</b>	Housing Market Assessment
<b>HRA</b>	Habitats Regulations Assessment
<b>IDP</b>	Infrastructure Delivery Plan
<b>LAA</b>	Land Availability Assessment
<b>LHA</b>	Local Housing Authority
<b>LP</b>	Local Plan
<b>LPA</b>	Local Planning Authority

## Glossary of Abbreviations and Acronyms

<b>LPP1</b>	Local Plan: Part 1
<b>LPP2</b>	Local Plan: Part 2
<b>LTA</b>	Local Transport Authority
<b>LVIA</b>	Landscape and Visual Impact Assessment
<b>NDP</b>	Neighbourhood Development Plan
<b>NLP</b>	Nathaniel Lichfield & Partners
<b>NMSS</b>	Report on the West Surrey SHMA by Neil MacDonald, NMSS
<b>NP</b>	Neighbourhood Plan
<b>NPPF</b>	National Planning Policy Framework
<b>NPPG</b>	National Planning Policy Guidance
<b>OAN</b>	Objectively Assessed Need
<b>PC</b>	Parish Council
<b>PIF</b>	Presumption in Favour.. (of development)
<b>POW</b>	Protect Our Waverley
<b>PPG</b>	Planning Policy Guidance
<b>PPTS</b>	(Government's) Planning Policy for Traveller Sites
<b>PROW</b>	Public Right of Way
<b>Resi</b>	Residential
<b>SA</b>	Sustainability Appraisal
<b>SAMM</b>	Strategic Access Management and Monitoring
<b>SANG</b>	Suitable Alternative Natural Greenspace
<b>SCC</b>	Surrey County Council
<b>STW</b>	Sewerage Treatment Works
<b>SFRA</b>	Strategic Flood Risk Assessment
<b>SHLAA</b>	Strategic Housing Land Availability Assessment
<b>SHMA</b>	Strategic Housing Market Area
<b>SNCI</b>	Sites of Nature Conservation Importance
<b>SoS</b>	Secretary of State

## Glossary of Abbreviations and Acronyms

<b>SPA</b>	Special Protection Areas
<b>SPD</b>	Supplementary Planning Document
<b>SRN</b>	Strategic Road Network
<b>SSSI</b>	Sites of Special Scientific Interest (SSSIs)
<b>ST</b>	Sustainable Transport
<b>TAA</b>	Traveller Accommodation Assessment
<b>TBH</b>	Thames Basin Heaths
<b>WBC</b>	Waverley Borough Council
<b>WCS</b>	Water Cycle Study
<b>WFD</b>	Water Framework Directive

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## WAVERLEY BOROUGH COUNCIL

### JOINT OVERVIEW AND SCRUTINY COMMITTEE

21 NOVEMBER 2016

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#### Title:

#### **THE SCOPE OF LOCAL PLAN PART 2: NON-STRATEGIC SITES AND POLICIES**

[Portfolio Holder: Cllr Adams]

[Wards Affected: All]

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#### Summary and purpose:

Local Plan Part 1 is the first part of the review of the 2002 Waverley Borough Local Plan. Local Plan Part 2, which will contain day to day development management policies, together with non-strategic allocations of land, will be the second part of the process in replacing the 2002 Local Plan. The Joint Overview and Scrutiny Committee is being asked to consider the scope of the Local Plan Part 2 and pass any comments to the Executive.

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

The preparation of Local Plan Part 2 will support the Corporate Priorities in relation to Community Wellbeing and Environment.

#### Financial Implications:

The Council has agreed a supplementary estimate of £200,000 to fund the additional resources necessary to support the acceleration of the production of Local Plan Part 2.

#### Legal Implications:

There are no legal implications arising specifically from this report

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#### Introduction

1. The review of the 2002 Waverley Borough Local Plan is taking place in two parts:-
  - Local Plan Part 1: Strategic Policies and Sites; and
  - Local Plan Part 2: Non-strategic Policies and Sites
2. The Council has recently published Local Plan Part 1 for public consultation. Once the comments have been considered as a result of this consultation, the Council will submit Local Plan Part 1 to the Secretary of State for its formal examination.
3. In July 2016 the Council agreed the new Local Development Scheme (LDS). This sets out the timetable for the completion of Local Plan Part 1 and the provisional timetable for the preparation of Local Plan Part 2. In particular, the key milestones for the preparation of Local Plan Part 2, as set out in the LDS are:

- Aug – Sept 2017: Consultation on preferred options and draft policies (Regulation 18)
- April 2018: Publication and Regulation 19 consultation
- July 2018: Submission for examination
- March 2019: Adoption

4. Officers have already commenced work on the preparation of Local Plan Part 2, particularly in relation to the scope of the document. The intention is to progress the production of Local Plan Part 2 as quickly as reasonably possible. In particular, much of the work to prepare the draft of Local Plan Part 2 will be taking place alongside the examination of Local Plan Part 1. Given that some of the policies and site allocations contained within Local Plan Part 2 are directly linked to the strategy set out in Local Plan Part 1, progress with the work on Local Plan Part 2 will clearly be dependent on the progress of Local Plan Part 1 through examination.
5. A further consideration that will affect the scope and potentially the timetable for Local Plan Part 2 will be progress with the various neighbourhood plans that are being prepared for a number of the towns and parishes in Waverley. The neighbourhood plans in preparation are at various stages. These include the Farnham Neighbourhood Plan, which has already reached the examination stage. The intention is that Local Plan Part 1 will set out the overall strategy and in some cases the specific housing allocation to inform the development of neighbourhood plans and the potential allocation of sites to deliver the development needs of the town/parish. In such cases, there may not be the need for allocations and some development management policies in Local Plan Part 2, if the related neighbourhood plan is dealing with these matters.

### **The Scope of Local Plan Part 2**

6. Attached as Annexe 1 to this report is a table setting out the key matters that Local Plan Part 2 is likely to cover. This is not an exhaustive list and there may be the need to address other matters as a result of any changes to national policy/guidance.

### **Recommendation**

That the joint Overview and Scrutiny Committee considers the scope of Local Plan Part 2 and forwards any comments to the Executive.

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### **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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### **CONTACT OFFICER:**

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**MATTERS LIKELY TO BE INCLUDED IN LOCAL PLAN PART 2: NON-STRATEGIC POLICIES AND SITES**

<b>Policy</b>	<b>Content to be included</b>
<b>General Policies</b>	
General environmental policy (similar to current Local Plan policy D1)	Impact of development including the cumulative impact of developments.
Sustainable Construction (potential policy to amplify LPP1 policy CC2)	<ul style="list-style-type: none"> <li>• Sustainable design</li> <li>• Flood management</li> <li>• Ecological enhancement</li> </ul>
Detailed policy on Design and layout of development	<ul style="list-style-type: none"> <li>• Density of development (including housing)</li> <li>• The development of garden land.</li> <li>• Crime and prevention</li> <li>• Landscaping</li> <li>• Amenity space</li> <li>• Conversion and subdivision of existing buildings</li> </ul>
Detailed policy on accessibility	<ul style="list-style-type: none"> <li>• Access and mobility for all including special needs</li> <li>• Servicing and bin storage</li> </ul>
Detailed policy on trees, hedgerows and woodlands	<ul style="list-style-type: none"> <li>• Ancient woodland</li> <li>• Tree protection</li> </ul>
Green Infrastructure	<ul style="list-style-type: none"> <li>• Green infrastructure requirements for developments</li> </ul>
Detailed policy on advertisements	
Detailed policy on Telecommunications.	
<b>Housing</b>	
Housing delivery policy (if required)	
Non-strategic site allocations	<ul style="list-style-type: none"> <li>• SHLAA sites</li> <li>• Greenfield sites</li> </ul>
Detailed policy on the retention of residential land and buildings	
Detailed policy on the conversion and subdivision of housing	
Detailed policies on Gypsy and Traveller Accommodation (to amplify	

LPP1 policy AHN4)	
Allocations for Gypsy and Traveller sites where needed	
<b>Employment</b>	
Detailed policies to consider the protection of existing employment land and the development of new employment land.	
Sites for safeguarding	Existing employment sites that we want to retain in employment use
<b>Built Environment</b>	
Review and designation of character areas within settlements (currently the BE policies in the Local Plan)	<ul style="list-style-type: none"> <li>• Hillsides areas</li> <li>• Areas of Special Environmental Quality</li> <li>• Areas of Low Density</li> </ul>
Review and designation of important green spaces	
<b>Rural Environment</b>	
Replacement of the Local Plan policy RD1 for development in villages (including a review of village settlement boundaries to address any anomalies).	
Review of main settlement boundaries to accord with strategy set out in LPP1.	
Implementation of detailed Green Belt boundary changes as set out in LPP1 policy RE2	
Implementation of detailed changes to boundaries of Local Landscape Designations as set out in LPP1 Policy RE3	
Replacement of and extensions to buildings in the countryside	<ul style="list-style-type: none"> <li>• including to dwellings under current Local Plan policies RD2 and RD2a</li> <li>• Amplifying the NPPF through qualifying the amount that will be considered appropriate in the Green Belt</li> </ul>
New and the reuse of buildings	<ul style="list-style-type: none"> <li>• ancillary residential outbuildings i.e. garages (currently Local Plan policy RD3)</li> <li>• Amplifying the NPPF through qualifying the amount that will be</li> </ul>

	considered appropriate in the Green Belt
Agricultural development/diversification	
Protecting agricultural land	
Agricultural dwellings	
Rural brownfield land	
<b>The Historic environment</b>	
Detailed policies for the management of the historic environment	<ul style="list-style-type: none"> <li>Heritage Assets: designated and undesignated inc. Listed Buildings, Scheduled Monuments, Conservation areas, Registered Parks and Gardens, archaeological interests, locally listed buildings and conservation Areas</li> </ul>
<b>Town Centres and Shopping</b>	
Review and designation of current town centre boundaries	
Designation of primary and secondary shopping frontages	
Key sites or other site allocations for town centre uses.	
<b>Transport</b>	
Detailed policies on transport	<ul style="list-style-type: none"> <li>Roads</li> <li>footpaths,</li> <li>cycleways</li> <li>other transport links</li> <li>parking</li> </ul>
Identification of specific routes	<ul style="list-style-type: none"> <li>Roads</li> <li>footpaths,</li> <li>cycleways</li> <li>other transport links.</li> </ul>
<b>Infrastructure</b>	
Land to be safeguarded for new infrastructure and services	<ul style="list-style-type: none"> <li>new/expanded schools</li> <li>safeguarding land for highway improvements</li> <li>expansion of facilities for utility companies.</li> </ul>
<b>Community</b>	
Detailed policies for new facilities	<ul style="list-style-type: none"> <li>new community facilities/schools/educational</li> </ul>

	establishments
Allocations for new facilities where needed	
<b>Leisure and Tourism</b>	
Detailed policies on tourism and visitor accommodation	<ul style="list-style-type: none"> <li>• New development and change of use to</li> <li>• Retention of existing development</li> </ul>
Detailed policies on leisure	<ul style="list-style-type: none"> <li>• New development including sports grounds/playing fields/golf courses/walking/cycling and horse riding (commercial and non commercial)</li> </ul>