# ANNEXE 1

## SUMMARY OF THE OUTCOME OF THE CONSULTATION ON HOUSING SCENARIOS AND OTHER ISSUES FOR THE WAVERLEY LOCAL PLAN PART 1

### Introduction

The consultation took place between **4th September and 17th October 2014**.

Comments were invited on some potential scenarios for distributing 8,500 new homes across the Borough in the period 2013 to 2031 (i.e. 470 homes a year). There was a supporting document explaining the consultation in detail, as well as a supporting leaflet and feedback form. The feedback form invited those responding to a number of questions using a range from strongly disagree to strongly agree. Respondent were also invited to rank the four housing scenarios in order of preference. There was an opportunity to add specific comments on the housing scenarios and to suggest any different scenarios that the Council should consider. There was also the opportunity to make more general comments and suggestions on the Local Plan, including any sites that the Council should be considering for allocation as strategic housing sites or sites for other uses.

In addition to direct consultation with individuals and organisations on the Local Plan consultation database, a number of other methods were used to publicise the consultation, including,

- Distributing the consultation leaflet to households and businesses in Waverley
- Press releases
- Information on the web site
- Distribution of documents to locality offices and libraries
- A mobile exhibition that toured the Borough during the consultation
- Presentation to the town and parish councils
- Two facilitated workshops for stakeholders.

There was a total of **4,265** respondents to the consultation. In many cases these expressed their preferences in response to each questions without making any additional comments. However, a number of individuals/organisations took the opportunity to make additional comments on the feedback form, or in accompanying letters, emails or reports.

### Statistical Responses to the Specific Consultation Questions

The series of graphs below show the responses to the specific consultation questions and cover the following issues:

1. The scope to increase house building within settlements.
2. The scope to increase house building on the edge of the main settlements.
3. The scope to increase house building on the edge of villages.
4. Whether rural brownfield sites should be used to provide new housing.
5. Whether a mixed use development, including housing, at the Dunsfold Aerodrome site should be included in the Local Plan.
6. Whether the changes identified in the Green Belt Review are appropriate.

7. Whether or not housing needs can be met without using land within the AONB.
8. Whether or not the AGLV designation should be retained pending completion of the AONB boundary review.
9. Whether or not the existing local landscape designations should be retained;
10. Whether or not the Council's approach to identifying sites for Gypsies, Travellers and Travelling Showpeople is appropriate.
11. Whether or not it is important that the Local Plan protects existing employment land and identifies and allocates new land for employment use.

## Question 1

**Detailed breakdown for 'There is scope to increase the amount of new house building within the boundaries of all existing settlements (for example through higher densities).'**

| Option | Results | |
|---|---|---|
| Strongly Agree | | 20% (788) |
| Slightly Agree | | 31% (1200) |
| Neither Agree or Disagree | | 6% (248) |
| Slightly Disagree | | 11% (416) |
| Strongly Disagree | | 28% (1090) |
| Don't Know | | 3% (112) |

## Question 2

**Detailed breakdown for 'There is scope to increase the amount of new house building on the edge of the main settlements of Farnham, Godalming, Cranleigh and Haslemere beyond their existing boundaries.'**

| Option | Results | |
|---|---|---|
| Strongly Agree | | 12% (472) |
| Slightly Agree | | 26% (986) |
| Neither Agree or Disagree | | 6% (216) |
| Slightly Disagree | | 11% (412) |
| Strongly Disagree | | 43% (1676) |
| Don't Know | | 3% (97) |

## Question 3

### Detailed breakdown for 'There is some scope for the villages within Waverley to accommodate some additional housing on the edge of the settlements beyond their existing boundaries.'

| Option | Results | |
|---|---|---|
| Strongly Agree |  | 21% (818) |
| Slightly Agree |  | 31% (1187) |
| Neither Agree or Disagree |  | 6% (218) |
| Slightly Disagree |  | 10% (398) |
| Strongly Disagree |  | 29% (1106) |
| Don't Know |  | 3% (116) |

## Question 4

### Detailed breakdown for 'Rural 'brownfield' sites should be developed to provide housing.'

| Option | Results | |
|---|---|---|
| Strongly Agree |  | 66% (2547) |
| Slightly Agree |  | 17% (671) |
| Neither Agree or Disagree |  | 4% (164) |
| Slightly Disagree |  | 3% (131) |
| Strongly Disagree |  | 9% (345) |
| Don't Know |  | 1% (24) |

## Question 5

### Detailed breakdown for 'Mixed-use development including housing at Dunsfold Aerodrome should be supported in the Local Plan.'

| Option | Results | |
|---|---|---|
| Strongly Agree |  | 70% (2725) |
| Slightly Agree |  | 12% (459) |
| Neither Agree or Disagree |  | 3% (129) |
| Slightly Disagree |  | 2% (93) |
| Strongly Disagree |  | 11% (440) |
| Don't Know |  | 1% (47) |

## Question 6

### Detailed breakdown for 'The potential changes to the Green Belt that have been recommended in the Waverley Green Belt Review are appropriate.'

| Option | Results | |
|---|---|---|
| Strongly Agree |  | 12% (446) |
| Slightly Agree |  | 18% (689) |
| Neither Agree or Disagree |  | 12% (462) |
| Slightly Disagree |  | 10% (376) |
| Strongly Disagree |  | 42% (1613) |
| Don't Know |  | 6% (248) |

## Question 7

### Detailed breakdown for 'Housing needs in Waverley can be met without using land currently designated as an Area of Outstanding Natural Beauty.'

| Option | Results | |
|---|---|---|
| Strongly Agree |  | 74% (2873) |
| Slightly Agree |  | 10% (378) |
| Neither Agree or Disagree |  | 4% (167) |
| Slightly Disagree |  | 3% (117) |
| Strongly Disagree |  | 5% (186) |
| Don't Know |  | 4% (142) |

## Question 8

### Detailed breakdown for 'The Council should retain the Area of Great Landscape Value designation until Natural England's review of the Surrey Hills Area of Outstanding Natural Beauty has been completed.'

| Option | Results | |
|---|---|---|
| Strongly Agree |  | 80% (3105) |
| Slightly Agree |  | 10% (389) |
| Neither Agree or Disagree |  | 4% (165) |
| Slightly Disagree |  | 1% (48) |
| Strongly Disagree |  | 2% (79) |
| Don't Know |  | 2% (79) |

## Question 9

### Detailed breakdown for 'The Council should retain its existing local landscape designations (Areas of Strategic Visual Importance/Areas of Historic Landscape Value/Farnham Aldershot Strategic Gap/Godalming Hillsides).'

| Option | Results | |
|---|---|---|
| Strongly Agree |  | 73% (2832) |
| Slightly Agree |  | 12% (474) |
| Neither Agree or Disagree |  | 6% (239) |
| Slightly Disagree |  | 3% (110) |
| Strongly Disagree |  | 2% (87) |
| Don't Know |  | 3% (116) |

## Question 10

### Detailed breakdown for 'The proposed approach for identifying sites for Gypsies, Travellers and Travelling Showpeople is appropriate.'

| Option | Results | |
|---|---|---|
| Strongly Agree |  | 17% (658) |
| Slightly Agree |  | 17% (669) |
| Neither Agree or Disagree |  | 29% (1123) |
| Slightly Disagree |  | 4% (142) |
| Strongly Disagree |  | 11% (420) |
| Don't Know |  | 21% (812) |

## Question 11

### Detailed breakdown for 'It is important that the Local Plan protects existing employment land and identifies and allocates new land for employment uses.'

| Option | Results | |
|---|---|---|
| Strongly Agree |  | 38% (1469) |
| Slightly Agree |  | 30% (1150) |
| Neither Agree or Disagree |  | 15% (589) |
| Slightly Disagree |  | 6% (218) |
| Strongly Disagree |  | 7% (271) |
| Don't Know |  | 4% (152) |

**Statistical Breakdown of the Preferences for the Four Housing Scenarios**

Set out below are graphs showing the ranking by respondents of the four housing scenarios. In terms of the 'Preferred' scenario, it will be seen that the overwhelming majority (80%) of those who responded favoured Scenario 4, which included the highest number of new homes at the Dunsfold Aerodrome site.

### Detailed breakdown for '1 (Preferred)'

| Option | Results | |
|---|---|---|
| Scenario 1 | | 12% (415) |
| Scenario 2 | | 4% (131) |
| Scenario 3 | | 5% (186) |
| Scenario 4 | | 80% (2856) |

### Detailed breakdown for '2'

| Option | Results | |
|---|---|---|
| Scenario 1 | | 3% (96) |
| Scenario 2 | | 16% (440) |
| Scenario 3 | | 76% (2098) |
| Scenario 4 | | 5% (125) |

### Detailed breakdown for '3'

| Option | Results | |
|---|---|---|
| Scenario 1 | | 5% (137) |
| Scenario 2 | | 75% (2050) |
| Scenario 3 | | 15% (417) |
| Scenario 4 | | 5% (147) |

### Detailed breakdown for '4 (Least Preferred)'

| Option | Results | |
|---|---|---|
| Scenario 1 | | 80% (2299) |
| Scenario 2 | | 4% (106) |
| Scenario 3 | | 1% (40) |
| Scenario 4 | | 15% (415) |

**Written Responses to 2014 Consultation on Housing Scenarios and Other Issues for Local Plan Part 1**

| Issue | Waverley Borough Council Response |
|---|---|
| **Housing within settlements (Question 1)** | |
| The statistical response to Question 1 shows a mix of views but a majority either agreeing or strongly agreeing that there is scope to increase house building within existing settlements. Those supporting the question refer to matters such as accessibility to services and the opportunity to make use of empty buildings. In many cases responses are caveated by comments on the need to protect character and not overload infrastructure. Those not supporting increased building within settlements refer to matters such as the impact on character and loss of open space. Lack of infrastructure capacity was also cited. | The Council's Land Availability Assessment (LAA) seeks to identify available land within settlements that has the potential to deliver housing in accordance with the criteria set out in the NPPF and NPPG. The methodology for identifying sites will be set out in the LAA. |
| **Locating Housing on the Edge of Settlements (towns and villages) (Questions 2 & 3)** | |
| The majority of responses disagreed that there is scope to increase house building on the edge of the main settlements. By contrast, in relation to villages, the majority of respondents agreed that there is some scope to provide additional housing on the edge of villages. In terms of those making additional written comments there was a mix of views:-<br>• Some felt that there was scope to build on the edge of settlements and that existing infrastructure could cope. It was also suggested that this was the most sustainable approach.<br>• In terms of villages, many respondents, including several parish councils, supported allowing villages to expand to meet local needs and to help to sustain local services. Some respondents felt that village infill should be avoided, whilst others felt that development should be contained within the existing settlement boundary.<br>• Some mentioned the risk of urban sprawl, whilst others felt that there is scope to expand on the edge of main settlements instead of villages as there is greater infrastructure. | The Council has sought, where possible to identify suitable land within settlements but cannot deliver the necessary number of homes by doing so. The Council has therefore had to consider locating housing on the edge of settlements, focusing where possible on sites that are well related to those settlements and on areas that less constrained by designations such as Green Belt, AONB and AGLV, as well as suitable rural brownfield sites. Infrastructure considerations have been taken into account. |

| | |
|---|---|
| **Use of brownfield land (Question 4)** | |
| Overwhelming support for the development of rural brownfield land for housing. Other comments were:<br>• Support for utilising brownfield land and protecting greenfield sites<br>• some support a 'brownfield first' approach, whilst others oppose any greenfield development;<br>• Some respondents who preferred the use of brownfield land acknowledged that some greenfield development may be unavoidable;<br>• Some confusion between 'greenfield' and 'Green Belt';<br>• Some linked the prioritising of brownfield sites with the allocation of SANG in the Farnham area;<br>• Those supporting brownfield land referred to the development of sites such as car parks, commercial buildings and agricultural buildings;<br>• Some of those commenting on brownfield development also said that infrastructure should be considered. | The Council agrees that rural brownfield land should be considered for housing, but only where this is acceptable as an alternative to the existing uses. However, other than Dunsfold Aerodrome, only a limited number of suitable and available rural brownfield sites have been identified and it is not possible to fully meet the need for housing using such sites. |
| **Dunsfold Aerodrome site (Question 5)** | |
| Question 5 related specifically to the Dunsfold Aerodrome site. 86% of respondents either agreed or strongly agreed that a mixed use at the site, including housing, should be supported in the Local Plan. Those making additional written comments raised a number of points including:-<br>• Many of those supporting development at the site did so on the basis that it would minimise the impact on other settlements and infrastructure elsewhere in Waverley and would reduce/avoid the need to develop greenfield or Green Belt land. There was also a reference to the benefits in terms of enabling the necessary investment and infrastructure (such as schools and health facilities) to support development.<br>• Some questioning the outcome from the consultation commented that self interest led to a biased result, for example the significant number of respondents from Farnham supporting major development at Dunsfold Aerodrome. | Dunsfold Aerodrome is a rural brownfield site but is in a relatively isolated location. The situation since the 2009 appeal has changed considerably and the Council now considers that the site can be sustainably developed for a mix of uses, including up to 2,600 homes, provided that the necessary supporting infrastructure is provided, including highways improvements.<br><br>Although many people responding to the consultation supported the scenario that included 3,400 homes at the site, the Council is not convinced that this number of homes could be built within the plan period (to 2032). In addition, such a strategy, even if it was deliverable, would result in a high number of homes in the eastern part of Waverley, and a less balanced strategy in terms of the wider distribution of development. |

| | |
|---|---|
| • A significant number of the respondents commenting on the site suggested that the Council should maximise the development opportunity at the site and deliver an even higher number of new homes.<br>• A much smaller number of respondents argued for a lower number of new homes at the site.<br>• Many of those supporting development at the site qualified this with the need to provided supporting infrastructure and services, as well as additional employment.<br>• In terms of infrastructure issues, the biggest concern relating to development at the site is the impact on the A281. Some suggested potential transport measures to address the impact of development on the local road network.<br>• Thames Water commented that the water supply to the site is currently limited and that it would take over 4 years to set up a water transfer scheme.<br>• Those opposed to development at the site raised a number of issues, including questioning whether the site is brownfield; raising concerns about the impact on the landscape around the site; suggesting that nothing has changed since the earlier new settlement proposal was dismissed at appeal; the impact on infrastructure; questioning whether the site is in a sustainable location; commenting that the housing should be close to existing settlements/infrastructure. | |
| **Green Belt (Question 6)** | |
| Question 6 asked respondents to say whether or not they agreed with the changes to the Green Belt that are recommended in the Green Belt Review. 52% of respondents said that they disagreed with the changes compared to the 30% who said that they agreed with the changes. Other points raised:<br>• Those supporting the changes referred to the benefits of building in sustainable locations and providing development to support the vitality of villages. Some of those supporting the changes were also promoting development sites in the affected areas; | Comments supporting the changes to the Green Belt are noted.<br><br>The Council considers that there are exceptional circumstances to justify the amendment of the Green Belt boundaries. This includes the high level of need for housing land and insufficient alternative sites. The NPPF requires those villages that do not make an important contribution to the Green Belt to be inset.<br><br>The Green Belt Review has assessed which land could be removed without harming its main purposes. |

| | |
|---|---|
| • Some of those supporting the changes commented that releasing Green Belt land for development would provide a more equal distribution of development<br>• A number of reasons were given for opposing changes to the Green Belt, including reference to the importance of protecting the Green Belt generally and that there must be exceptional circumstances to justify changing the Green Belt boundary.<br>• Some of those opposing changes to the Green Belt did so in relation to specific areas. Examples include objection to changes in the Binscombe area and some of the suggested changes to Green Belt around villages.<br>• A number of representations referred to specific sites. Some were opposed to the potential removal of Green Belt status for sites identified in the Review. Other comments include suggesting changes in areas where the Review does not recommend a change.<br>• Some respondents specifically questioned the process and the validity of the Review document itself. | Outside the villages, only two areas in the Borough are proposed for removal from the Green Belt (Binscombe and Halfway Lane/ Westbrook, Godalming). Policy RE2 in the Local Plan Part 1 seeks to protect the remaining Green Belt from inappropriate development. Recommendations have also been made to add to the Green Belt in some areas of Waverley.<br><br>The Green Belt Review found that for the most part, Waverley's Green Belt function is strong. The boundaries should only be changed in exceptional circumstances where the designation is no longer in accordance with the five purposes of the Green Belt as set out in the NPPF.<br><br>Some of the larger villages will be inset from the Green Belt and, through part 2 of the Local Plan, some expansion to the villages will be made to accommodate the planned level of growth.<br><br>The Green Belt Review methodology adopted by consultants AMEC has been established by the Inspector into the Cheltenham/Tewksbury/Gloucester Joint Core Strategy as appropriate and robust (December 2015). |
| **The Area of Outstanding Natural Beauty (AONB) (Question 7)** | |
| Question 7 invited respondents to comment on whether or not the Council can meet its housing needs without using land within the AONB. 84% of those responding agreed that Waverley's housing needs can be met without using AONB land. Other points raised were-<br><br>• Those opposing development in the AONB said that the AONB should be protected; some argued for the policy to be strengthened; some argued that the constraint of the AONB should be a justification for a reduction in the housing target for the Borough; some disputed whether there are any exceptional circumstances in Waverley to justify developing AONB land.<br>• Some respondents referred to specific locations in the Borough where development in the AONB would have an unacceptable impact.<br>• Others felt that there was no alternative but to develop smaller | Comments noted.<br><br>The status of AONBs, and the protection afforded to them, is confirmed in the NPPF and through the Surrey Hills AONB Management Plan. Policies in the local plan will be consistent with this guidance. |

| | |
|---|---|
| plots in the AONB. It was also commented that some use of the AONB and Green Belt should be acceptable where there are social benefits. | |
| **Local Landscape Designations (Question 9)** | |
| Question 9 invited respondents to say whether or not they agree that the Council should retain its existing local landscape designations. These are the Farnham/Aldershot Strategic Gap, the Areas of Strategic Visual Importance (ASVI), the Areas of Historic Landscape Value and the Godalming Hillsides. The majority of respondents (86%) agreed that these designations should be retained. Those making additional written comments raised both general comments and site specific comments about the value of local designations and their importance in considering where development should go. | Comments noted.<br><br>The Council intends to retain all of the local landscape designations as their purpose has been established in the Local Landscape Designations Review, but it will review the boundary of the Strategic Gap in light of comments made about the effectiveness of part of it in the Review. The ASVI boundaries and those of the Godalming Hillsides will also be reviewed in Local Plan Part 2.<br><br>The ASVI designation at Holy Cross Hospital, Haslemere is a clear recommendation to remove the whole area and this is proposed in Local Plan Part 1. |
| **Gypsies, Travellers and Travelling Showpeople (Question 10)** | |
| • Question 10 invited respondents to say whether or not they agree with the Council's approach to identifying sites for Gypsies, Travellers and Travelling Showpeople. There was a mixed response to this question. 39% agreed, 16% disagreed and 44% either didn't know or neither agreed or disagreed.<br>• Some did not feel that there was a justification for giving special treatment to travelling showpeople and that there should be a minimum number of sites for Gypsy, Traveller and Travelling Showpeople in Waverley.<br>• Some of those accepting the need for provision argued that sites should be kept small and well-dispersed across the Borough. Some support the sequential approach to site selection. Some respondents said that sites should be for a short stay and should not become permanent homes.<br>• Some responses challenged the specific findings of the Traveller Accommodation Assessment (TAA), raising issues about the methodology and the approach taken in identifying the level of future need and supply | Planning Policy for Traveller Sites published by the Government in August 2015 states that local planning authorities should set pitch targets for Gypsies and Travellers and plot targets for Travelling Showpeople to address the likely permanent and transit site accommodation needs of travellers in the their area (para 9).<br><br>The policy in the local plan sets out the how traveller accommodation needs will be met through identifying sites in Part 2 of the plan and the criteria for determining planning applications for traveller sites.<br><br>The Traveller Accommodation Assessment was undertaken using joint methodology agreed by all Surrey authorities. Since it was published in 2014 the Council has prepared an update to take into account additional information about the levels of accommodation on some of the existing sites to ensure that the assessment of need in the TAA is accurate to base the plan on. |

| Employment Land (Question 11) | |
|---|---|
| Respondents were invited to say whether or not they agree that it is important that the Local Plan protects existing employment land and identifies new land for employment uses. The majority of respondents (71%) agreed with that statement. Other comments were –<br><br>• Employment should be considered alongside housing. In addition to housing, there should also be local employment opportunities to improve sustainability;<br>• New housing should be located near employment and/or next to major transport hubs to facilitate access to employment;<br>• Local employment should also be supported in villages to improve sustainability.<br>• Some argued that the housing scenarios fail to recognise the needs of local communities, with limited employment opportunities;<br>• A number of respondents assumed that new housing would be occupied by commuters and that there are limited local employment opportunities.<br>• Some respondents said that the Plan does not consider employment opportunities sufficiently or to protect existing sites.<br>• Some expressed concern about the loss of business space to housing.<br>• Some referred to the increase in the number of self-employed and increase in home working.<br>• Some argued that there is not a need for additional employment land. It was also argued by some that vacant offices and upper floors of shops be converted to residential use<br>• Enterprise M3 LEP said the Council should do more work to provide an understanding of the local business base and the emerging cluster of firms. It also said that consideration should be given to how the housing scenarios link with the economy of Waverley and the surrounding area.<br>• Guildford Borough Council said that Waverley should align its review with its own Employment Land Assessment. | The spatial strategy in the Local Plan includes employment and housing and it seeks to ensure that development for each use supports the other. Like housing, employment development is to be focussed at the four main settlements to ensure that jobs are accessible to minimise commuting. However, it is acknowledged that employment premises in rural areas both make an important contribution to the economy as well as provide jobs to those living in the Borough's villages and more remote locations. Furthermore there is a need to avoid developing in the open countryside. Therefore Policy EE1 permits new development in all defined settlements, the redevelopment/intensification of existing employment sites and the re-use and conversion of existing rural buildings for employment use.<br><br>The West Surrey SHMA objectively assesses housing need derived from the levels of economic growth forecast in the Employment Land Review aligned with the Council's Economic Strategy 2015 to 2020.<br><br>The Local Plan includes policies that set out the how the Council will seek to meet the employment development needs assessed in the evidence. This includes a policy to protect existing employment sites in the Borough unless there is no reasonable prospect of the site being used for employment purposes.<br><br>The explanatory text to the policy on economic development recognises the way that people carry out their jobs has changed. It recognises live/home working.<br><br>The Waverley Employment Land Review 2016 has undertaken an assessment of employment needs from 2013 to 2033 using three different scenarios of employment growth. It concludes that a scenario aligned with the Council's economic strategy 2015 to 2020 is the most realistic. This forecasts growth that will require additional B1a/b land and a surplus of other B uses. However, there is still a need for considering additional employment land in these uses to ensure flexibility to respond to changing requirements.<br><br>The Council's ELR 2016 has updated its assessment of potential |

| | |
|---|---|
| • There was another comment that the current Employment Land Review is flawed because some of the large sites included are now or will soon be residential. | supply. |
| **Comments on the Housing Scenarios** | |
| • The choice of scenarios was too limited and that the form of consultation meant that those responding would choose the option that affected them the least;<br>• Insufficient information to enable an informed decision to be made and that the scenarios should have been accompanied by a sustainability appraisal;<br>• scenarios were conflicting and incomprehensible;<br>• Some respondents selecting Scenario 4 thought it was the 'least worse' and that it was assumed that the necessary infrastructure would be provided;<br>• In relation to Farnham, the majority commenting argued that the proposed level of development was too high and disproportionate. Some respondents suggested that Farnham should take more development;<br>• It was a similar position in Cranleigh where the majority of those commenting on Cranleigh felt that the level of housing was too high. A smaller number said that Cranleigh can take more housing.<br>• In relation to Godalming and Haslemere, some respondents argued that these settlements are not taking their fair share of development, particularly given their rail links;<br>• There was a mixed response in relation to the larger villages. Some raised doubts about whether these villages could accommodate 450 homes: others argued that the number should be higher;<br>• Some respondents said that the distribution of 150 homes to the smaller villages should be quantified as not all the villages have capacity for further housing;<br>• In relation to the Scenarios including development at Dunsfold Aerodrome, the argument was put forward that that these indicate | The four scenarios we consulted on could all deliver about 470 homes per year, the level of assessed need at the time. The objectively assessed housing need has since risen to 519 homes per year.<br><br>The Council does not agree that the choice of scenarios was too limited or conflicting. If too many options had been given, this would have been confusing.<br><br>The consultation was accompanied by an interim sustainability appraisal and this appraised the four scenarios. These were based on environmental constraints, the availability of land and other factors. The numbers for Godalming and Haslemere were lower than Farnham and Cranleigh because the former settlements are more heavily constrained (e.g. by Green Belt and/or AONB) and fewer sites were promoted in these settlements.<br><br>The spatial strategy in the Local Plan is essentially based on scenario 3, which provided for 2,600 homes at Dunsfold Aerodrome. However, as the objectively assessed need has since risen to 519 homes per year (from 470), the levels of housing elsewhere has increased in some cases. |

| | |
|---|---|
| development going where there will be least resistance rather than where development is needed. It was also argued that Scenarios 1 and 2 and, to a lesser extent 3, support the evidence base, whereas Scenario 4 would be contrary to the evidence and would bring into question the soundness of the Plan;<br>• Of those saying that none of the scenarios was suitable, it was the overall level of housing and the perceived lack of infrastructure that was a concern. | |
| **Suggested Alternative Scenarios** | |
| • Increase the number of homes planned at Dunsfold Aerodrome to 5,000 or more<br>• A more even distribution of housing across the Borough. | The promoters of Dunsfold Aerodrome have not indicated that they are considering as much as 5,000 homes at the site. Moreover, it would not be possible to deliver this number of homes by 2032.<br><br>Scenarios with a more even distribution of homes across the Borough were considered but dismissed as a reasonable option as some settlements are more constrained than others. In particular, Godalming and Haslemere are significantly constrained by designations such as the Green Belt and the AONB. |
| **Additional Suggestions** | |
| • No greenfield development within the parishes of Cranleigh, Ewhurst, Alfold and Shamley Green and Wonersh, with the proposed development being added to the number of homes at Dunsfold Aerodrome instead<br>• A similar argument from Farnham supporting expansion at Dunsfold Aerodrome and a corresponding reduction in provision at Farnham<br>• Limiting the size of development at Dunsfold Aerodrome to approximately 500 homes<br>• A lower overall housing number justified by constraints<br>• Restricting housing to local people<br>• A number of new villages (4 or 5) instead of one large new-town.<br>• Accommodate all new housing within settlements through achieving higher densities and making better use of under-utilised land | The spatial strategy seeks to achieve an appropriate balance between the use of suitable brownfield land and greenfield land on the edge of settlements, including villages. As one of the four main settlements, it would not be appropriate to not have any new development on land adjacent to the built up area of Cranleigh. Similarly, most villages can make a contribution to meeting housing needs, with the level of this contribution varying according to their access to services and environmental constraints, including Green Belt.<br><br>Farnham is the largest town in Waverley with fewer constraints that some other towns and so it needs to play an important role in delivering future housing. A strategy that supported a very high number of dwellings at Dunsfold Aerodrome would, even if it was deliverable, result in a very high number of homes in the eastern part of Waverley, furthest from where the affordable housing needs are focused, for example. This would not be sustainable. |

| | |
|---|---|
| • A new town to take the bulk of the growth should be provided alongside the A3 and mainline rail corridor (Milford/Witley/ Godalming)<br>• Provide a new settlement in the Hankley Common area<br>• More housing in Wrecclesham along with a proposed Wrecclesham by-pass<br>• A general increase in housing in smaller villages. It was also suggested that there should be some housing at Wormley with the proximity to employment opportunities and the railway station<br>• Housing should be located along the A & B roads<br>• Substantial development in Witley<br>• Substantial development between Godalming and Milford<br>• Relocate employment uses to business parks and redevelop existing employment sites for housing<br>• Increase housing in the larger villages and lower tier settlements<br>• Distribute homes to areas where the necessary services and infrastructure already exist<br>• Develop a large settlement alongside A3 south of Thursley<br>• Consider a mix of Options 1 to 4 based on availability and suitability. | A scheme of 500 dwellings at Dunsfold Aerodrome would not be sustainable, or viable, as it would not deliver the infrastructure required.<br><br>A lower overall housing number (than the objectively assessed need of 519 homes per year) has been considered but rejected. The Government, in the NPPF, states that Local Plans must meet assessed needs in full unless the impacts of doing so significantly outweigh the benefits. To date, the evidence for the plan has not identified any 'showstoppers' that would justify a lower number.<br><br>The alternative new towns suggested through the consultation are on land that is not being promoted for development or are otherwise unsuitable in terms of their location. |
| **Comments by Issue** | |
| **Overall number of homes** | |
| • The majority of those commenting on the number of new homes said that the number was excessive. Other comments made were:-<br>• Challenged the validity of the Strategic Housing Market Assessment (SHMA)<br>• Borough cannot accommodate this level of development due to constraints, lack of infrastructure capacity etc.<br>• Should consult on different options for the number of new homes<br>• Some comments suggesting that neighbouring local authorities have the capacity to meet some of Waverley's identified needs<br>• Some consider level of new housing to be right; some consider that even more housing will be required to meet Waverley's need. | The level of assessed need in the final version of the SHMA was 519, higher than the assessed level at the time of the 2104 consultation. A lower overall housing number (than the final objectively assessed need of 519 homes per year) has been considered but rejected. The Government, in the NPPF, states that Local Plans must meet assessed needs in full unless the impacts of doing so significantly outweigh the benefits. To date the evidence for the plan has not identified any 'showstoppers' that would justify a lower number.<br><br>The West Surrey SHMA 2015 sets out the methodology for assessing housing need between 2013 and 2033. It sets out the future need for housing based on population projections and household formation |

| | |
|---|---|
| • Some challenges from developers arguing that need may be greater than 470 homes a year.<br>• Some concerned that, in the absence of an up-to-date SHMA, it is not possible to determine whether 470 homes a year will be sufficient, or whether Waverley will have to approach neighbouring districts to help to meet the need.<br>• Some also commented on need to address backlog of unmet needs | rates as well as on the economic growth forecast. The role of the SHMA is then to consider if there is a need for an adjustment to the demographic housing need figure to take into account that in the past some households in certain age groups would not have been able to form because house prices were unaffordable. This includes assessing the level of housing supply relative to supply in the past. The approach is in accordance with the NPPF and the advice in the NPPG. The five year housing supply required by the NPPF has to take into account any undersupply of housing in the plan period. |
| **Infrastructure** | |
| • Insufficient information on infrastructure to assess the housing scenarios<br>• Concerns that roads, education and health already operating beyond capacity<br>• Flood risk should be given greater consideration<br>• Car parking, particularly near stations, needs expanding<br>• Need to consider cross boundary infrastructure issues<br>• Support for re-instating the Cranleigh – Guildford railway line or reclamation for the line for trams/guided buses<br>• Public transport poor in eastern side of the Borough<br>• More cycleways needed<br>• Housing in eastern part of Borough needs major improvement to the A281<br>• If development allowed at Dunsfold Park need to safeguard land for a road connection from Alfold to the A3 at Milford<br>• Concerns about electricity supply, sewage, water supply/pressure and air quality as a result of new development;<br>• Infrastructure should be provided before housing<br>• Lack of SANG capacity<br>• Questions over the deliverability of the necessary infrastructure – lack of funding may prevent delivery<br>• Some argue that locating development in one place would allow for significant infrastructure investment.<br>• Another view was that spreading housing across the Borough | Infrastructure providers, including Waverley Borough and Surrey County Councils, have been consulted on the overall level of growth proposed in the Plan, as well as more detailed site information (where available).<br><br>In terms of transport, the County Council's 2016 Strategic Highways Assessment will be assessing the residual impact of the Plan's strategy on the road network. The effect on the A3 will be the subject of further consultation with Highways England.<br><br>As far as all other infrastructure providers are concerned, none has identified any insurmountable constraints to the delivery of the necessary infrastructure to support the Plan's policies and allocations, subject to local upgrades and improvements where and when required. |

| | |
|---|---|
| within and adjoining settlements, would avoid over intensification of existing infrastructure, creating the opportunity for upgrading and introducing smaller more financially viable infrastructure upgrades.<br>• Concerns about infrastructure capacity in different parts of the Borough.<br>• Some specific responses from infrastructure providers regarding current and future requirements. | |
| **Housing type and affordability** | |
| There was a lot of support for more affordable housing, whilst there was a resistance to larger 'luxury' properties. Other comments were:-<br>• Need for more affordable housing, particularly for the young and older people.<br>• Need for more high quality, smaller houses for single occupiers and those downsizing.<br>• Some support for higher density housing in appropriate locations;<br>• Need for homes for young families.<br>• Need for affordable housing to rent as well as to buy.<br>• Need for mechanism for affordable housing remains so in future.<br>• Meeting affordable housing requirements in one part of the Borough through supply in another would be contrary to the objectives of the NPPF and the presumption in favour of sustainable development. This is one of the reasons given for opposing significant development at Dunsfold Aerodrome. | The Local Plan sets out an amount of affordable homes required on developments that exceed the Governments thresholds set out in a Ministerial Written Statement and the NPPG. As a result of the findings of the West Surrey SHMA, the amount has been set to deliver the amount of affordable homes assessed as needed in the SHMA whilst taking into account the evidence on viability. The Plan also sets out the requirement for different house tenures, types and sizes to meet the affordable housing needs assessed in the SHMA.<br><br>A mechanism for ensuring that affordable homes remain affordable in perpetuity will need to accord with the NPPF and legislation. The mechanism will be through the implementation of any planning permission and S106 obligations. This will be set out in supplementary planning documents.<br><br>In developing the strategy, consideration has ben given to the distribution of the need for affordable housing. However, this has to be balanced with the reality that the provision of affordable homes relies on the development of market housing overall. Therefore, affordable homes can only go where market housing is located. This is affected by environmental constraints as well as other factors regarding the suitability, achievability and availability of land for housing development. |
| **Biodiversity (SPA, SANG etc.)** | |
| • Some concerns/objections regarding SPA and SANG issues in Farnham. Lack of SANG will affect housing numbers | The identification of additional SANG capacity, including potential new sites, is being investigated as part of the local plan evidence base. |

| | |
|---|---|
| • SANG must be identified before housing allocation is decided<br>• Existing SANG should be prioritised for brownfield development<br>• Some question whether SANG works<br>• Dunsfold Aerodrome preferred because it would have least impact on the SPAs<br>• Some site specific comments regarding SANG provision relating to promoted housing sites<br>• General support for protecting SPAs<br>• Some argue that the same exclusion area should apply to all the SPAs not just Thames Basin Heaths<br>• Some detailed comments from Natural England to assist shaping policy<br>• Some argue that the SPAs need more protection in policy because they are International designations. | The allocation of SANG is on a 'first come, first served' basis and cannot differentiate between brownfield and greenfield sites.<br><br>The effectiveness of SANG and the definition of any further 'exclusion zones' in avoidance strategies is a matter for the Thames Basin Heaths SPA Joint Strategic Partnership Board, as advised by Natural England.<br><br>The international significance of the SPAs is already reflected in policy guidance and avoidance strategies. |
| **Specific sites** | |
| A number of responses related to specific sites, both for and against. These include sites that the Council has also considered through its SHLAA, as well as some new sites identified through the consultation. Only a few completely new sites were identified and these are mainly quite small in size. | The Council has taken these comments into account in updating its SHLAA (now known as the LAA). In addition, the new LAA has taken into account other sites identified or promoted since 2014. |
| **Cross-boundary issues** | |
| • Many respondents highlight the need for greater co-operation with Guildford Borough on a range of issues<br>• Need to address cross-boundary issues, particularly in relation to traffic/ transport and education<br>• Major developments outside Waverley, such as in Whitehill-Bordon and Aldershot should reduce housing provision in Waverley<br>• Need to work with Guildford and Woking on housing issues for the housing market area<br>• Must liaise with other housing market areas<br>• Some comments suggesting that Waverley is not meeting duty to cooperate in relation to housing needs issues | The Council will prepare a Duty to Cooperate Statement that addresses the areas where the Council has worked together with neighbouring authorities to address cross-boundary issues such as housing need and infrastructure. |

| | |
|---|---|
| • Should be considering the implications of meeting some of the unmet housing need arising from London<br>• Need to align employment needs evidence with the equivalent in Guildford<br>• Sustainability Appraisal should include a specific section on transport and accessibility<br>• Some site specific comments highlighting cross boundary issues. | |
| **Various comments on the consultation itself** | |
| • Some say that consultation timescale was too short;<br>• Some expressing concern over the lack of information in the consultation on matters like traffic and infrastructure<br>• Concern that the distribution of the Making Waves consultation document was inadequate<br>• Scenarios were too limited. | The Council carried out a very thorough consultation, including delivering a special issue of Making Waves on the Local Plan to every household. Many staffed exhibitions were held across the Borough. There were some distribution problems but these were resolved as soon as we were made aware of them. The consultation period was considered to be adequate. |
| **Validity of Evidence Base** | |
| Some respondents made comments challenging the validity of some of the evidence and other supporting documents. | Evidence has been gathered in accordance with the NPPF and the NPPG. Each assessment or study used sets out how the approach to gathering the evidence.<br><br>The very few inaccuracies that were correctly identified with the evidence base studies were subsequently rectified. However, no fundamental weaknesses were identified with the evidence base. |
| **Comments from Specific Stakeholders** | |
| **Highways Agency (now Highways England)**<br>• The Council should promote strategies, policies and allocations that will support alternatives to the car and the operation of a safe and reliable transport network<br>• STA: unclear why a consistent overall level of trip generation is not presented across all scenarios<br>• STA: information does not demonstrate where queue and delay increases are likely to the same accuracy as in the peak hour junction assessments: locations on the A3 of potential impact should be examined further<br>• STA: does not provide sufficient information to ascertain whether | The (2014) STA has been updated (2016) as a joint assessment with Guildford Borough. Discussions are continuing with Highways England, along with Guildford BC and Surrey CC, to address issues relating to the impact of the Waverley and Guildford Local Plans on the A3. |

| | |
|---|---|
| traffic within or attracted to Waverley will have a material impact on the critical section of the A3 through Guildford between the A31 Hog's Back junction and Clay Lane, as well as J10 of the M25; request addendum to consider this impact, particularly whether A3 mainline carriageway and slip road queuing will increase safety risks and delays. | |
| **Environment Agency**<br>• No strong preference for any particular scenario<br>• Where appropriate, would encourage development within existing urban areas and/or brownfield sites over development on natural land<br>• Notes that Thames Water have (i) concerns about the waste water services for the level of potential development at Cranleigh/Dunsfold/Ewhurst/ Hascombe/Rowly/Ewhurst Green/Alfold; and (ii) potential concerns regarding the sewerage network capacity in Farnham: failure to address these issues satisfactorily may make the plan unsound<br>• Must clearly demonstrate that all strategic sites and site allocations have been flood risk sequentially tested<br>• Protection of the Green Belt should not be prioritised over the allocation of sites in flood zones. | Thames Water (TW) are working directly with the developers of the Dunsfold Aerodrome site in connection with the current planning application for the redevelopment of the site.<br><br>At the time planning permission is sought for new developments in the Farnham Area, TW would request an appropriately worded planning condition to ensure the timing and phasing of the developments are appropriate to enable the necessary treatment upgrades to be carried out to ensure capacity is available before the additional development flows are received.<br><br>The sequential testing of development sites, in conjunction with an updated Strategic Flood Risk Assessment, will form part of the evidence base of the Plan. |
| **Natural England**<br>• No specific comments on the four scenarios<br>• Emphasises key policy drivers – NPPF, SE Plan Policy NRM6 (TBH SPA) – in developing appropriate strategic policies<br>• Thames Basin Heaths SPA: Avoidance Strategy and the HRA have not identified that large developments (>50 units) within 5-7km of the SPA should also be assessed on a case by case basis and may be required to provide appropriate mitigation (as stated in TBH Delivery Framework)<br>• Wealden Heaths SPA: disagree with HRA conclusion that the low percentage increase in visitors within the 5km zone will not lead to likely significant effect on the SPA. HRA should be updated in line with the Hindhead Avoidance Strategy 'Advice Note for | Appropriate reference to the 5-7 km zone will be included in the TBH SPA policy.<br><br>HRA will be updated for the Publication Plan.<br><br>Green Infrastructure issues are included in the Infrastructure Delivery Plan. Disagree with the need for a separate study. |

| | |
|---|---|
| Developers'<br>• Suggests preparation of 'Green Infrastructure Study' to ensure that new and existing residents within 5km of the Wealden Heaths SPA, and within 9km of the Thursley, Hankley & Frensham SPA, were not deficient in accessible natural greenspace | |
| **Enterprise M3 (LEP)**<br>• Consideration should be given to how the scenarios link with the economy of both Waverley and its surrounding areas.<br>• Support conclusions of Employment Land Review on need for good quality, well located employment sites to support investment by existing business and growth in the local business base. | The policy in the Local Plan is linked to the economic strategy aligned scenario for economic growth set out in the Council's Employment Land Review. This is considered the most realistic scenario for Waverley. Waverley's Economic Strategy is linked to the role in the economy that the EM3 LEP Economic Plan recognises for Waverley. |
| **Comments from other planning authorities** | |
| **Chichester District Council**<br>No preference between options provided the one selected is deliverable. | Comments noted. |
| **Elmbridge Borough Council**<br>• Make it clear which LPAs are included in various duty to cooperate boards/groups<br>• Green Belt Review should recognise the importance of working with surrounding HMAs when considering the strategic importance of any Green Belt<br>• The SHMA may not be robust as it produces projections for Waverley only and not across the HMA<br>• The SHMA needs to set out the functional relationship with other HMA where there is need for cooperation over a wider area<br>• Need to consider how to meet Traveller needs from 2027 to 2031 | The SHMA is considered to be a robust study and assesses need across the West Surrey housing market area. It was produced using accepted methodology set out in the NPPF and NPPG and recognises the links with other housing market areas.<br>The Waverley TAA 2014 and the Update report to the TAA 2016 sets out the need in Waverley from 2012 to 2027. From 2017 the level of need is based on the number of pitches/plots needed at that time and then multiplied with a family formation rate of 3%. This could be carried out for the period up to 2031. However, the Council will be looking to update its TAA in accordance with the new definition of gypsies and travellers in the Planning Policy for Traveller Sites August 2015 and any other government advice. |
| **Guildford Borough Council**<br>• Spatial Strategy needs to take into account the West Surrey SHMA when it is finalised<br>• Ensure that the start date for the plan accords with the start date for the evidence of need in the SHMA and plan to meet any backlog in housing from then to meet need | Comments noted.<br>The Council has liaised closely with Guildford BC on a number of relevant cross-boundary issues.<br>The spatial strategy takes the final SHMA into account and takes into account any backlog of housing from the start of the plan period. |

| | |
|---|---|
| • Add a sustainability topic of “transport and accessibility” to the SEA to comprehensively consider these elements rather than the existing limited approach<br>• The Strategic Transport Assessment should also include assessment of public transport (including impact on Guildford Station) and other sustainable transport modes<br>• Assess the impact of scenarios on Guildford<br>• Explore the extent to which the Green Belt may be reviewed to safeguard land for future development needs beyond the plan period<br>• Discuss the potential suitability of sites within Waverley near the boundary which could facilitate sites within Guildford.<br>• Work together with partners to Progress the delivery of Tongham Pools SANG<br>• Consider insetting in the Green Belt and including provision on strategic sites to meet Traveller’s needs<br>• As Guildford and Waverley are in the same FEMA and HMA ensure that the Employment Land Review of both Councils are aligned and the employment numbers that will need to be delivered | The Sustainability Assessment methodology has been amended to take transport into account more thoroughly.<br><br>The STA takes projected future development in Guildford into account, drawing on recent data from the emerging Guildford Local Plan.<br><br>The potential suitability of land within Waverley but close to the boundary with Guildford has been considered. |
| **Hart District Council**<br>• Supports that scenarios would meet Waverley’s OAN but Waverley should consider increasing its housing figure should Guildford or Woking have difficulty in meeting their needs.<br>• Would encourage Waverley to deal with its own Traveller need within its own geographical area | Noted. Waverley is working closely with other authorities in its own HMA (Guildford and Woking) and is seeking to agree a statement of common ground.<br><br>The Local Plan sets out the how traveller accommodation needs will be met through identifying sites in Part 2 of the plan and the criteria for determining planning applications for traveller sites. |
| **Mole Valley District Council**<br>• Need to be involved in the cross boundary transport issues to understand the traffic implications of the development scenarios.<br>• Continue to discuss with Move Valley on option to meet identified Traveller needs | Cross boundary issues with Mole Valley have been taken into account in developing the spatial strategy. The STA has taken into account large development proposals in adjoining Districts.<br><br>The policy in the local plan sets out the how traveller accommodation needs will be met through identifying sites in Part 2 of the plan and the criteria for determining planning applications for traveller sites. |

| | |
|---|---|
| **Runnymede Borough Council**<br>The consultation is based on the OAN set out in the draft Waverley SHMA 2013 which is set to be superseded by the West Surrey SHMA. The issue of the number of homes to be delivered in the HMA and their distribution will need to be considered under the Duty to cooperate. | The Local Plan is based on objectively assessed need contained in the West Surrey SHMA which has been updated to September 2015. It uses the most up to date population projections and household formation rates. |
| **Rushmoor Borough Council**<br>• The consultation is based on the OAN set out in the draft Waverley SHMA 2013 which is set to be superseded by the West Surrey SHMA. The issue of the number of homes to be delivered in the HMA and their distribution will need to be considered under the Duty to cooperate.<br>• Need to identify the FEMA<br>• Emphasises the importance of maintaining sufficient separation between Aldershot and Farnham. | The Local Plan is based on objectively assessed need contained in the West Surrey SHMA which has been updated to September 2015. It uses the most up to date population projections and household formation rates.<br><br>Evidence demonstrates that Waverley has a functional economic market area with Guildford and Woking, although it has strong economic links with other neighbouring local authorities. The identification of the FEMA and these links will be the basis for cooperating with other LPA on how the economic needs within these areas will be most appropriately met.<br><br>The spatial strategy takes into account the need to maintain sufficient separation between Farnham and Aldershot. |
| **Spelthorne Borough Council**<br>The consultation is based on the OAN set out in the draft Waverley SHMA 2013 which is set to be superseded by the West Surrey SHMA. The issue of the number of homes to be delivered in the HMA and their distribution will need to be considered under the Duty to cooperate. | The Local Plan is based on objectively assessed need contained in the West Surrey SHMA which has been updated to September 2015. It uses the most up to date population projections and household formation rates. |
| **South Downs National Park Authority**<br>Need to specifically consider the potential impacts on the SDNP, particularly the SHLAA. | In developing the spatial strategy, potential impacts on the national park have been taken into account, including through the sustainability appraisal. |
| **Comments from County Councils** | |
| **Surrey**<br>• Requirement for continuing cooperation between the two Councils to meet the transport, public health and educational needs.<br>• SCC has concerns that the Dunsfold Aerodrome site is not a sustainable location for a proposed new settlement. | The Council agrees that there is a need for continuing operation on these issues. Indeed, Waverley and Surrey CC have continued to work closely together on these issues since 2014, including on transport impacts. |

| | |
|---|---|
| • All scenarios would result in a significant increase in school numbers and there would be a need to expand provision in some areas.<br>• Four sites in the SHLAA are located in a Mineral Safeguarding Area.<br>• Development at Dunsfold Aerodrome would need to take account of a permitted anaerobic digestion facility.<br>• 450 homes per year would place pressure on public health services and an increase in traffic would result in poorer air quality. | The Council notes the County Council's concern over Dunsfold Aerodrome but, taking account of the range of social, economic and environmental sustainability issues, the Council is satisfied that a new development can be delivered sustainably, provided that appropriate infrastructure is provided, including highways improvements.<br><br>Several promoted sites are in a Mineral Safeguarding Area, and have been taken into account in the updated LAA.<br><br>The Dunsfold Aerodrome policy addresses the issue of the permitted anaerobic digestion facility. |
| **Hampshire**<br>• Would like to see a detailed Transport Assessment on the four potential scenarios before responding.<br>• It is suggested that WBC identifies the impact of growth on the cross boundary transport network.<br>• Continue dialogue with HCC regarding school places needed in Hampshire as a result of development | Comments noted.<br><br>A Strategic Transport Assessment was available at the time of the 2014 consultation. An updated Strategic Highway Assessment has been undertaken by SCC. |
| **West Sussex**<br>• Would welcome opportunity to discuss scenarios that involve development close to border, including education. | In preparing the Plan, the Council has sought to address cross - boundary issues. |