

## Questions and Answers on the Local Plan Modifications:

| Q. no. | Issue/Question  | Officer response  |
|--------|---|---|
| 1      | What consultation would there be on new policy SS7A, Dunsfold Aerodrome Design Strategy, at Masterplan stage? | <p>The policy requires that a Masterplan is produced by the developer and that this is subject to public consultation, assessed by a Design Review Panel and is approved by the Council as part of any planning consent on reserve matters. As such, the Masterplan would be subject to the 'normal' consultation process of a planning application. This is consistent with condition 29 of the called in application, which requires a Masterplan to be submitted to the council and approved prior to the first reserved matters application. In addition, at each phase of the development, the Design and Access Statement accompanying planning applications should include a compliance statement that demonstrates how the proposals accord with the Masterplan.</p>  |
| 2      | The timing of Farnham Town Council reviewing their Neighbourhood Plan   | <p>As explained in para 9, the Farnham Neighbourhood Plan was produced on the basis of the draft housing allocation in the submitted Local Plan (2330). However, the Local Plan Inspector has indicated a higher housing target is appropriate and the Council considers that Farnham should take a reasonable proportion of this uplift. The report states that it is envisaged that additional allocations in Farnham would be made in Local Plan Part 2. It is understood that this approach has been questioned. Legal advice is that a further modification stating that the additional housing required in Farnham would be allocated either in Local Plan Part 2 or in a review of the Farnham Neighbourhood Plan would be possible. However, if Farnham TC were to decide that they wanted to allocate the higher numbers through a review of their Neighbourhood Plan, then this would need to occur relatively early in the lifecycle of the neighbourhood plan to enable sites to be allocated, permissions to be granted and those developments to be built before the end of the plan period (2032).</p> |
| 3      | What would be impact of the modifications on outstanding Secretary of State appeals in Farnham?               | <p>It is recognised that there are several outstanding appeals in the Farnham area, for example on Waverley Lane and Lower Weybourne Lane. It would be expected that the Secretary of State will dismiss these, as they conflict with the development plan. The Council can currently demonstrate a 5 year housing supply. However, as set out in para 083 of the Neighbourhood Planning section of the NPPG, a Ministerial Statement from December 2016 confirmed that even if the Council could not demonstrate a 5 year supply, for the next 2 years relevant policies on the supply of housing would not be out of date for the Farnham area as long as a 3 year supply can be demonstrated.</p> <p>The same para of the NPPG adds that a planning application conflicts with a neighbourhood plan that has been brought into force, planning permission should not normally be granted.</p> <p>To conclude, the Farnham Neighbourhood Plan will continue to be given significant weight in planning decisions even if Waverley can</p>   |

|   |   |  |
|---|---|--|
|   |   | no longer demonstrate a 5-year supply of deliverable housing sites.  |
| 4 | Why can't Dunsfold Aerodrome be allocated for more than 2600 homes                        | <p>Local Plan Part 1 allocates the site for 2,600 homes up to 2032. At the Regulation 18 Issues and Options stage in 2014, the Council consulted on 3 levels of growth at the site, 1,800, 2,600 and 3,400 homes. As part of the evidence for the Local Plan, an assessment of housing delivery was undertaken by Troy Planning. Troy Planning has advised that there is no certainty that more than 2,600 homes could be delivered on the site in the plan period for following reasons:</p> <ul style="list-style-type: none"> <li>• The trajectory shows that the 2,600 homes will be delivered over 13 years from 2019/20 at an average of 200 homes a year. This is already higher than the average number of homes that can be delivered on other greenfield sites (171) but is considered realistic because four developers will be delivering homes on the site</li> <li>• Increasing numbers on the site would not mean that higher numbers of homes can be delivered each year for at least 10 years unless there is evidence to demonstrate that this could be achieved or that there will be more than four developers on the site.</li> <li>• The amount of housing that can be delivered in the first five years of the local plan has been agreed by the applicants and the Council at the "call-in" inquiry. Any increase would leave the Council open to challenge</li> <li>• In reality the number of homes on Dunsfold may be lower in any given year as a result of the way developers work and because there are a number of different developers on the site. They simply will not all start and finish building their houses at exactly the same time. The trajectory has therefore allowed for flexibility so that any shortfalls in earlier years can be met at the end of the plan period (i.e. in 2030/31 and 2031/32).</li> </ul> <p>Whilst 3,400 was one option that was subject to public consultation in 2014, there is no evidence at present to demonstrate that more than 2,600 homes can be delivered within the plan period. Whilst further growth might be an option for the next plan period, this would need to be considered in light of evidence and its potential impacts on the open space of the new settlement.</p> |
| 5 | Dunsfold Aerodrome trajectory – can we even out the figure for the site in last 10 years? | <p>Currently the housing trajectory shows that Dunsfold Aerodrome will deliver at a rate of 257 homes each year from 2022/23 to 2029/30. The delivery rate then goes down to 193 homes in 2030/31 and then 78 in 2031/32. The question is whether this can be distributed equally so that the rate would be 232 a year from 2022. This is not considered appropriate for the following reasons:</p> <ul style="list-style-type: none"> <li>• These annual rates are the ones set out in the report on the assessment of delivery rates for Dunsfold Aerodrome by Troy Planning for the Local Plan and presented to the Local Plan Inspector. These are rates that have been agreed by the developers.</li> <li>• There was a lot of debate about the estimated delivery of</li> </ul>  |

|   |  |  |
|---|--|--|
|   |  | <p>houses on Dunsfold Aerodrome in the housing trajectory at the examination hearing and the Local Plan Inspector has not indicated that they are unrealistic. To change the rates would open up the debate again about the realistic delivery of Dunsfold Aerodrome.</p> <ul style="list-style-type: none"> <li>The current housing trajectory allows for flexibility so that if all the homes were not delivered at the rates stated, any shortfall in delivery in earlier years could be met in the final two years. Levelling out the rates for the final 10 years from 2022 to 2032 would mean that there would be no room for meeting any slippage from earlier years because this could result in a need to deliver more than 257 homes a year, which is the peak number of homes considered by Troy Planning as being deliverable.</li> </ul>  |
| 6 | <p>Why can't the villages take more housing?</p> <p>Why can't Witley (including Milford) have a higher housing number?</p> | <p>In terms of the absolute numbers, all the larger villages and smaller villagers have a proposed increase. The villages are taking more housing as a result of the uplift to the housing requirement to 590 homes a year that the Local Plan Inspector considers is needed to make the Local Plan sound.</p> <p>The Local Plan Inspector did not indicate that the spatial strategy should be changed. The Spatial strategy is a significant constraint upon how much the villages can be enlarged. The strategy differentiates between allowing moderate growth in the larger villages but only limited growth in the others, and those villages in the Green Belt that are not being inset, and for which the Green Belt Review did not recommend any change, have very limited scope for further growth for that reason. However, in terms of the proportion of housing that is needed, once the numbers from Dunsfold Aerodrome, the other villages and the estimates are taken into account; it is proposed that Chiddingfold, Witley including Milford and Alfold have a 1% higher proportion of the housing requirement than the proportion of the housing that they were previously required to deliver.</p> <p>Witley's (including Milford) proposed housing requirement in the Local Plan has been increased from 380 to 480 homes in the main modifications. This is slightly more than a proportionate increase. It is considered that this is appropriate given that the site is constrained by the Green Belt and the Wealden Heaths SPA. Some of the sites that have been promoted for housing development do not lie within areas that are recommended in the Green Belt Review for release. Some of these sites also lie within 400m of the Wealden Heaths SPA.</p> |
| 7 | <p>Why is Aaron's Hill, Godalming not a strategic allocation in Local Plan Part 1?</p>                                     | <p>As stated in para 12 of the Executive Report, the Inspector wanted the Council to be clearer in its intentions for the Aarons Hill site, in terms of whether it is within the plan or not. It is therefore proposed to include a main modification to confirm that the site would be removed from the Green Belt and the AGLV and incorporated within the settlement area of Godalming in Local Plan Part 1. The site could then be allocated in Part 2 or it could come</p>  |

|   |   |   |
|---|---|---|
|   |   | <p>forward as a speculative application. The option of allocating the land as a strategic housing site in Part 1 was considered but rejected. Firstly, the Inspector did not suggest that the site be allocated in Part 1. Secondly, this would involve considerable work, for example drafting a completely new policy for the development of the site and subjecting this to sustainability appraisal and other testing. This has the potential to delay the adoption of the plan. Finally, allocating the site in LPP2 would provide more opportunity for consultation with the community and other stakeholders.</p>  |
| 8 | <p>What does the HRA Addendum say about the 160 uplift in Haslemere? Will NE object and require a SANG mechanism?</p> | <p>Our draft HRA addendum for the additional figures has highlighted the need to discuss with Natural England the continuance of the existing case-by-case policy for assessing impacts of housing developments on Wealden Heaths Phase 1 &amp; 2 SPA. We have a meeting set up early during the consultation period to discuss their proposed response to the Inspector's modifications. Their response will go directly to him and he will make a judgment in his final report.</p> <p>In terms of Farnham and the Thames Basin Heaths SPA, our HRA indicates that the continuation of the current policy approach is sufficient to mitigate any predicted impact on the SPA. Additional SANG is likely to be required toward the end of the plan period and a modification to this effect is in the schedule.</p> <p>The additional requirement has been calculated to be between 7.28 and 7.78ha, as opposed to a maximum of 6.3ha in the submitted version.</p>  |
| 9 | <p>What does the Sustainability Appraisal (SA) Addendum say about the sustainability of the preferred option?</p>     | <p>Sustainability Appraisal work is ongoing and an Addendum will be published alongside the main modification schedule. Three realistic alternative options for delivering the uplift of 1349 new homes by 2032 have been developed and tested.</p> <ul style="list-style-type: none"> <li>• Option 1 increases allocations proportionately across the settlements,</li> <li>• Option 2 applies Green Belt and landscape constraints fully and</li> <li>• Option 3 increases allocations proportionately but with adjustments for local circumstances (the preferred option).</li> </ul> <p>The draft headline conclusions are that none of the options are unsustainable, and that option 3 (the preferred and recommended option) performs best when measured against several sustainability objectives, including housing, economy and traffic.</p> <p>The HRA and SA Addendums will be completed and published for the start of the consultation. Neither indicates any fundamental objection to the proposed main modifications. These reports do not need to be published for this evening's Executive meeting as Members are not being asked to make a decision. However, they will be available to inform representations made to the modifications and the Inspector's final report.</p> |