

WAVERLEY BOROUGH COUNCIL

SPECIAL ENVIRONMENT OVERVIEW & SCRUTINY COMMITTEE

22 OCTOBER 2018

Title:

WAVERLEY BOROUGH LOCAL PLAN PART 2: SITE ALLOCATIONS AND DEVELOPMENT MANAGEMENT POLICIES – PRE SUBMISSION DRAFT

**[Portfolio Holder: Cllr Storey]
[Wards Affected: All]**

Summary and purpose:

This report updates Environment Overview & Scrutiny Committee on the work to develop the Publication version of Local Plan Part 2 (LPP2). As with previous reports, this report will focus on the areas that are likely to generate a high degree of public interest, however Officers have been able to make a number of changes to the draft Plan which address a large number of concerns raised through the consultation.

Subject to the consideration of the Overview & Scrutiny Committee, the intention is to seek the approval of the Executive and Council at Special Meetings on 31 October 2018 to publish this Pre-Submission Draft for formal consultation.

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

Local Plan Part 2 will contribute to meeting corporate priorities in relation to the Environment and Community Wellbeing.

Equality and Diversity Implications:

There are no particular Equality and Diversity Implications from this report. Local Plan Part 2 makes positive contributions to equality and diversity by supporting allocations for the Gypsy and Traveller community, and supporting the National Space Standards on bedroom size.

Financial Implications:

There are no direct financial implications arising from this report. Any spend required detailed in the report will be met from existing approved budgets.

Legal Implications:

There are no direct legal implications resulting from this report. The legal services team will continue to support planning services and the plan making process to ensure that any legal requirements are met.

1. Background

- 1.1 Local Plan Part 2 (LPP2) is the second stage in the development of the new Local Plan for Waverley, following the adoption of Local Plan Part 1 (LPP1): Strategic Policies and Sites in February. Members are reminded that the key strategic policies are contained in LPP1, together with a number of strategic allocations. LPP2 has a number of purposes. It contains additional site allocations for those areas (Godalming, Haslemere, Elstead and Milford/Witley) where these are not being done through the neighbourhood plan. It contains the proposed site allocations to meet the needs of Gypsies and Travellers. It provides a number of 'day-to-day' development management policies to replace the retained policies from the 2002 Local Plan and it confirms settlement boundaries and the boundaries of other key designations.
- 1.2 The LPP2 Preferred Options consultation completed on 9 July 2018. In total 990 responses were received. Officers have read each response and where appropriate, changes have been made to the consultation document
- 1.3 A Draft Plan has been produced for publication which is the subject of this report. A copy of the draft Pre-Submission Plan is attached as Annexe 1.

2. Significant areas of change to form the Draft Plan

Housing Allocations

- 2.1 The new NPPF does not differentiate between windfall development¹ on garden land and windfall development on other land. Previously our windfall estimates have discounted the contribution from windfalls on garden land. As a result, the windfall estimates for the Local Plan have been reviewed and the contribution from windfall sites for Waverley's overall housing requirement has increased. This has done two things. Firstly, it has altered the trend data for previous years' windfall developments for each settlement. Consequently, it has affected the residual number of homes to find in the remainder of the plan period, and therefore reduced the number of homes that LPP2 needs to find sufficient sites for in Godalming and Haslemere.
- 2.2 In addition, a further year's worth of planning permissions has been added to the figures bringing the base date for the housing allocations to 1st April 2018. This has also caused a reduction in the number of residual houses to allocate sites for.
- 2.3 The following table shows how the figures have changed.

¹ Windfall developments are those not identified in the development plan. Previously, developments on gardens in urban areas have not been permissible. The new NPPF changed the situation and developments on gardens in urban areas can now be classified as windfalls.

	1 st April 2017 requirement (as per Preferred Options consultation)	1 st April 2018 requirement (with new windfall methodology applied to towns)
Godalming	348	278
Haslemere	416	352
Elstead	67	58
Witley	247	236

2.4 It may be of interest to Members to know that by using the new methodology, it is possible to apply similar changes across the Borough. This is likely to result in a reduced residual housing target in Cranleigh and Farnham which will be communicated to the Neighbourhood Planning groups (although Farnham Neighbourhood Plan uses a slightly different approach to windfall calculations supported by their Examiner). The situation is more complicated with the villages where data on windfalls over past years does not produce reliable trends that could be used to apportion a windfall target to each village which, if larger than previously calculated, could be used to reduce the residual housing number. This means that a similar reduction is not applicable to the housing figures per village and they will still be expected to contribute their housing figure in Policy ALH1 of Local Plan Part 1 plus a contribution to windfalls. This information will be explained to those parish councils undertaking neighbourhood plans via the ongoing engagement.

Housing sites in Haslemere – a reduced reliance on sites in the AONB

2.5 Numerous responses were received to the recent Preferred Options consultation relating to proposed housing allocation sites in Haslemere. These comments can be grouped into two categories:

- Comments relating to sites either within or partially within the AONB
- Comments relating to Red Court proposed allocation (n=150 responses alone for this site)

2.6 In an effort to reduce the number of sites required either within or partially within the AONB, and in recognition of the requirement of the NPPF to make effective use of land, Officers have re-looked at the urban sites and, where justified, have increased the yield on some sites. This includes increasing the potential yield on two sites where the Council is the predominant landowner, the Fairground Car Park and Haslemere Key Site.

2.7 As a result of the increased yields on the urban sites and lower residual amount of housing to allocate for, Officers have been able to remove all allocations on sites within or partially within the AONB in Haslemere. This approach accords with the NPPF which states that major development should only be allowed in the AONB in exceptional circumstances.

2.8 Comments relating to the site known as Red Court, off Scotland Lane, referred largely to traffic impacts and concerns over landscape. The site itself is outside the AONB but within the Local Plan designation of 'AGLV treated as AONB'.

Nonetheless, the allocation was reviewed by an external Landscape Architect who stated in her draft report that the impact on the AONB could be mitigated by careful design, retention of all existing vegetation and tree cover, and an appropriate height limit on development. The density of development envisaged on the site as a whole is quite low, providing the opportunity to retain and enhance screening on the site. Further discussions on the site have been held with the Transport Division in Surrey County Council who said that the application would need to be supported by a full Transport Assessment to demonstrate safe access for vehicles and pedestrians in addition to assessing cumulative impact on traffic on local roads (in line with Policy ST1), but had no in principle objection in relation to this site in terms of road capacity. Haslemere Town Council has no objection in principle to the site.

2.9 The options for meeting the housing requirement in Haslemere are, in the officers' view, limited. As members know, some greenfield allocations have been required elsewhere in the Borough to meet the housing requirement. Therefore, with this additional evidence, the allocation at Red Court remains within the Plan as an important part of the suite of allocated housing sites.

Elstead

2.10 As a result of the reduced number of residual homes to find by the end of the Plan Period, the number of homes proposed on the site 'Land to the rear of the Croft' in Elstead has been reduced from 35 to 30. Whilst officers have noted the concerns raised about some of the Elstead allocations through the consultation, officers remain of the view that they are appropriate and that, through the planning application process, any potential adverse impacts, such as in relation to transport, can be mitigated. Officers from Surrey County Council raised no objection in principle to the sites off Hookley Lane but suggested that access issues can be dealt with at application stage.

Godalming

2.11 As a result of the reduction in the number of residual homes to find by the end of the plan period and further information obtained from the developer or site promoter, the following changes to site allocations have been made:

- Aaron's Hill site allocation reduced from 270 to 260 dwellings,
- Land East of Binscombe increased from 19 for 20 dwellings,
- Land at Keys Cottage and Wedgewood reduced from 10 to 7 dwellings,
- 1-22 Catteshall Lane reduced from 28 to 20 dwellings

2.12 The total number of houses planned to come forward on these site allocations slightly exceeds the number of houses allocated to Godalming in Local Plan Part 1. However, all of the site proposed for allocation in Godalming are within the settlement area, where the principle of development is acceptable, and in the context of a plan where the housing allocation is a minimum.

Witley including Milford

- 2.13 As a result of the updated housing requirement, and further details of an alternative site coming forward, two proposed allocations within the AONB have been removed from the proposed allocations. These are Land at Old Elstead Road and Land at Mousehill Mead. The two remaining AONB sites at Coneycroft and Land at Manor Lodge are deemed by Officers, supported by an independent Landscape Report, to be the least harmful in terms of AONB and Green Belt. Witley Parish Council raised in their response to the Preferred Option consultation a concern about over development in Milford with four sites in close proximity. By removing two of these sites, the draft Plan allays some of these concerns.
- 2.14 A new allocation is proposed at 'West of Petworth Road'. This site is within one of the broad areas identified as having potential for removal from the Green belt in the Green belt Review. The site has the advantages of being outside of the AONB and to have the ability to provide sufficient SANG for itself and potentially the two other sites within close proximity to the Wealden Heaths Phase 1 SPA (this position has been verified by Natural England). Allocating this site for 70 dwellings and increasing the allocations at Highcroft to a minimum of 15 dwellings and at Wheeler Street Nurseries to 40 dwellings mean that the housing requirement can still be met.
- 2.15 There remains a body of support for allocating the land at Secretts as an alternative to sites within the AONB. However, the position in relation to this site remains as it was in the Local Plan Part 1 Examination, namely that it is not in an area where the Green Belt Review specifically suggested that there is scope to take land out of the Green Belt. It has been argued that some of the site is brownfield. However, this has not been established definitively. Clearly if any land on the site is ultimately confirmed to be brownfield then there could be scope for some development, but this would still have to meet the NPPF requirement in relation to impact on the Green Belt.

Other changes

- 2.16 With the publication of the new NPPF in July 2018, it is clear that LPP2 will be examined against the new Framework. Officers have worked hard to ensure compliance with the new Framework within the context of a two-part Plan, i.e. some of the changes to the NPPF can not be enacted through a non-strategic plan. Changes include the removal of primary and secondary frontages from the draft Plan, and a focus instead on the Primary Shopping Areas. This is because the NPPF no longer expects local planning authorities to define the primary and secondary frontages.
- 2.17 Members will be aware that changes to the settlement boundaries were proposed in the Preferred Options document. Some changes were minor updates to the boundaries based on previous planning applications, whereas others are more substantial, for example removing areas of land from the Green Belt for the Neighbourhood Plan in Chiddingfold to allocate those areas for housing. A number of responses were received in relation to the proposed boundary for Chiddingfold, and as a result of ongoing liaison with the Parish Council over their proposed housing allocations, a new boundary is proposed. Dockenfield Parish Council had concerns about the number of changes proposed to their settlement boundary so a compromise position is suggested in the draft Plan focussing the changes to areas

where permission had previously been granted or the line did not follow a defensible boundary on the ground.

Comments from Statutory Bodies

- 2.18 Sport England objected to LPP2 in its representation based on a lack of coverage of sport and recreation in the Plan. Officers have responded to this organisation clarifying that sport, leisure and recreation are strategic issues addressed in LPP1.
- 2.19 Natural England requested greater information on landscape impact for the proposed housing sites in Elstead, Witley and Haslemere. This work has been done, in collaboration with themselves and the AONB Officer and has fed into the changes made to the allocations noted above. Historic England made some useful comments on the heritage policies.
- 2.20 The Environment Agency have been working with us on the flood risk assessment of sites and recommended that detailed modelling be provided for certain site allocations (including Haslemere Key Site, 5-21 Weyhill, Rear of Weyhill, 12 Kings Road, and two other sites now removed from the Plan). These sites have also been assessed through the Flood Risk Assessment to the Plan and the required sequential test for site allocations, which the Environment Agency suggests takes a precautionary approach. More detailed site assessment would take place at the planning application stage. Thames Water commented against each site within their area and also made a suggestion for inclusion in the Infrastructure Delivery Plan (IDP). They raised that point minor infrastructure upgrades may be required to support water supply to the Aaron's Hill development, Coneycroft and Old Elstead Road in Milford and a desire to enter into early discussions with the developers. They raised no further concerns on water supply in their area, nor for water quality. Southern Water commented that none of the allocations fall within their area and therefore had no comments. No comments were received from South East Water
- 2.21 Guildford Borough Council was concerned that LPP2 only sought to provide 66% of the traveller accommodation for households where it is unknown if they meet the planning definition. The Council has an obligation to meet the need of those households that do meet the definition and by allocating some of the 'unknown' need, the Council is future-proofing itself against future need assessments and changes in the planning definition. Need for a transit site was not identified within Waverley, therefore no transit site allocations are proposed. Surrey County Council raised some concerns about the site 'East of the Willows' which is one of the proposed allocations for Gypsies and Travellers, and which lies adjacent to the site that they manage. However, the concerns are poorly evidenced and Officers feel that without greater substance, the Council would face challenge to the non-allocation of this site during the examination process. The site therefore remains an allocation, with the caveat about access to be agreed with SCC, and for the latter part of the Plan Period to allow an access agreement to come forward. Farnham Town Council supports this allocation.
- 2.22 Rushmoor Borough Council supports the proposed changes to the Farnham-Aldershot Strategic Gap. No comments were received from Mole valley, Horsham, Chichester, East Hampshire, Hart, Spelthorne, Elmbridge or Tandridge Borough Council. Reigate and Banstead had no objections at this stage but recommend an additional policy on the siting of caravans and houseboats.

2.23 The National Trust supports the policy on Tourism. No responses were received from Network Rail, Homes England, Telecommunications providers, National Grid, SSE, the Southern Gas Network nor the Waverley and Guildford Clinical Commissioning Group (CCG). The North East Hampshire and Farnham CCG were satisfied with the principles and objectives but had specific comments on the Coxbridge Employment site, now removed as an allocation.

Conclusion

2.24 Elements of the draft Plan will continue to attract attention from the public but Officers have worked hard to ensure that those elements are justified and reasonable. Changes have been made to site allocations to ensure that the draft Plan maximises urban opportunities and only allocates in the AONB where the impact can be mitigated by design. An additional assessment has been commissioned to support arguments on these sites. Comments raised by statutory consultees, including Parish Councils and neighbouring Local Authorities can largely be addressed through continued communication on the role of LPP2 or by minor amendments to the Plan.

2.25 The views of Members are sought on the draft Plan to be published for a six-week consultation in November 2018.

Recommendation

That the Overview and Scrutiny Committee considers the Pre-Submission Plan and provides comments and recommendations to the Executive.

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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