

WAVERLEY BOROUGH COUNCIL

EXECUTIVE

6TH OCTOBER 2020

Title:

WAVERLEY BOROUGH LOCAL PLAN PART 2 - SITE ALLOCATIONS AND DEVELOPMENT MANAGEMENT POLICIES

Portfolio Holder: Cllr A MacLeod, Portfolio Holder for Planning Policy, Services and Brightwells

Head of Service: Zac Ellwood, Head of Planning and Economic Development

Key decision: Yes

Access: Public

1.0 Purpose and summary

1.1 This report requests Executive to recommend to Council that it approves the Pre-Submission version of Local Plan Part 2 (LPP2) for its consultation under Regulation 19 of the Local Planning Regulations. This report focuses on the areas that have generated a high degree of public interest as a result of the representations the Council received from the previous consultation on the Preferred Options version of LPP2 in May – July 2018. It also considers the feedback to the proposed Pre-Submission version of LPP2 that was considered by the Environment O&S in October 2018. In response to this, Officers have been able to make a number of changes to the draft Plan which address most of the concerns raised at that meeting. This report also considers the observations made at the recent meeting of the Environment O&S Committee on 22nd September 2020. Where it is deemed necessary, Officers have suggested changes to LPP2 which it is asking Executive to agree before LPP2 is considered by Full Council.

2.0 Recommendations

2.1 That the Executive recommends to Council that:

- a) the Pre-Submission version of Local Plan Part 2 attached as Annexe 2 to this report be approved for consultation under Regulation 19 of the Town and Country Planning (Local Planning) Regulations 2012;
- b) the pre-submission Local Plan Part 2 consulted on includes the amendments to the Plan set out in response to the observations made on the pre-submission version of Local Plan Part 2 at the Overview and Scrutiny Committee on 22nd September 2020 attached as Annex 3 to this report;

- c) the Head of Planning and Economic Development be given the authority to make any further typographical or formatting changes to the pre-submission version of Local Plan Part 2 that are deemed necessary for its consultation.

3.0 Reason for the recommendation

- 3.1 To consider the Pre-Submission draft of LPP2 before the Council formally decides if LPP2 should be consulted on before it is submitted to the Secretary of State for examination under Regulation 22 of the Town and Country Planning (Local Planning) Regulations 2012.

4.0 Background

- 4.1 Local Plan Part 2 (LPP2) is the second stage of the new Local Plan for Waverley, following the formal adoption of Local Plan Part 1 (LPP1): Strategic Policies and Sites in February 2018. Members are reminded that the key strategic planning policies for the Borough are contained in LPP1, together with a number of strategic allocations. LPP2 has a number of purposes:

- Allocating additional housing sites for those areas (Haslemere, and Milford/Witley) where allocations are not being done through a Neighbourhood Plan and where the housing requirement in LPP1 has not already been met by existing commitments.
- Allocating sufficient sites/pitches to meet the objectively assessed needs of Gypsies and Travellers.
- Setting out the 'day-to-day' development management policies to replace the 'retained policies' from the 2002 Local Plan.
- Defining settlement boundaries and the boundaries of other key designations.

- 4.2 The key stages for preparing LPP2 are as follows:

- 1) Preferred Options consultation
- 2) Consideration of changes to LPP2 from the representations to the Preferred Options
- 3) Preparation of the Pre-Submission document
- 4) Pre-Submission consultation
- 5) Submission of LPP2 to the Secretary of State for examination including any modifications made as a result of the representations on the pre-submission document
- 6) Examination
- 7) Inspector's Report on LPP2 Examination
- 8) Adoption

- 4.3 The Pre-Submission version is the version of the Plan that the Council wants to adopt and therefore, wishes to submit to the Government for examination. Any representations received as a result of the consultation will also be submitted to the Government as part of the examination, together with any modifications that the Council feels should be made to the Pre-Submission version of the plan in light of the representations received.

4.4 The LPP2 Preferred Options consultation ended on 9 July 2018. In total, 995 responses were received. Officers have considered each response and, where appropriate, changes have been made to the document to prepare the Pre-Submission version. Attached as **Annexe 1** is a summary of the key issues coming out of the Preferred Options consultation, together with the officers' response.

4.5 An earlier draft Pre-Submission Plan was considered by the Overview and Scrutiny Committee in October 2018. However, a number of streams of additional work were identified as being needed in order to further consider if the Pre-Submission document can go out for its Regulation 19 consultation. These included:

- Seeking further evidence from utility companies and infrastructure providers that infrastructure in relation to water supply and health provision will be delivered to support the specific allocations proposed by Officers, particularly in Haslemere.
- Addressing issues around some of the sites proposed for allocation in Haslemere and the contribution that windfall housing sites could make to the amount of housing required in LPP1.
- Further evaluation of sites proposed within Witley/Milford including assessing the appropriateness of allocating sites that lie outside the areas indicated by an asterisk in Local Plan Part 1 that have the potential for removal from the Green Belt.

4.6 Subsequent to this, the Council declared a climate emergency in September 2019, which commits Waverley to regard climate change as a serious threat that requires urgent action to reduce carbon emissions and conserve biodiversity. As a result, Officers have given further consideration to the environmental policies in LPP2 to see where they can be strengthened in relation to these objectives.

4.7 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 2**.

4.8 This version of the pre-submission plan was scrutinised by the Council's Overview and Scrutiny Environment Committee on 22nd September 2020. A number of observations have been made to the Plan for the Executive to consider when making their recommendation to the Council. A schedule of the observations is attached as **Annexe 3** along with proposed amendments to the pre-submission version of LPP2 as a result of considering these observations.

5.0 Significant areas of change to LPP2 from the Preferred Options consultation document

5.1 This report focuses on the main changes to LPP2 from the document that was previously subject to the Preferred Options consultation and the Pre-Submission document that was originally presented to O & S Environment in October 2018, particularly with regard to the following issues:

- The housing requirement for settlements.

- Specific housing site allocations in Haslemere, Witley/Milford and to meet traveller accommodation needs across the Borough.
- Climate Change and biodiversity.
- Other changes.

6.0 The housing requirement for settlements

- 6.1 LPP2 is only proposing allocating sites to meet the housing requirement in LPP1 for, Haslemere and Witley/Milford. At the time of the Preferred Options consultation, it was also envisaged that LPP2 would deal with housing allocations in Godalming and Elstead. However, Elstead Parish Council and Peper Harow Parish Meeting have since decided that housing allocations for Elstead will be made through the Elstead and Weyburn Neighbourhood Plan. In relation to Godalming, the minimum housing target of 1,520, as set in LPP1, has already been exceeded by 219 dwellings, based on up-to-date information on completions, planning permissions and expected windfall sites. As a result, specific housing allocations for Godalming are no longer required in LPP2.
- 6.2 The amount of homes that need to be delivered on sites that are to be allocated in LPP2 has been updated to a base date of 1st April 2020. These figures take into account the number of completions from 1st April 2013 and the number of outstanding planning permissions at the base date. The figures also include an estimate of the number of homes on windfall sites¹ that will contribute to the housing requirement. This estimate is based on the past rates of housing completions on these sites. The changes to the NPPF no longer differentiate between windfall development on garden land and windfall development on other land, whereas before our windfall estimates discounted the contribution from windfalls on garden land. As such, the amount of homes estimated from windfall development now includes a contribution from garden land.
- 6.3 The updating of the housing supply figures to the new base date of April 2020 has affected the residual number of homes required to be delivered on allocated sites in the remainder of the plan period for Haslemere and Witley/Milford.
- 6.4 The following table shows how the figures have changed from the base date used in the Preferred Options LPP2 document to the base date being used for the Pre-Submission version.

Table 1 - Housing required in LPP2 on allocated sites

¹ Windfall sites 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 considered as windfalls if there is evidence to support this.

	1 st April 2017 requirement (as set out in the Preferred Options consultation)	1 st April 2020 requirement (for the pre-submission consultation)
Haslemere	416	320
Witley	247	203

7.0 **Housing sites in Haslemere**

7.1 A number of sites throughout Haslemere were proposed in the Preferred Options consultation document consulted on in the summer 2018. These mainly included sites within the urban area. However, in order to meet the housing requirement for Haslemere set out in LPP1, the Preferred Options document at that time also included the proposed allocation of five greenfield sites. These were: Land East of Longdene House, Land South East of Haslemere Water Treatment Works, Land North of Haslemere Saw Mills, Longdene Field and Land at Red Court. Numerous responses were received to the 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, Scotland Lane, proposed allocation (the consultation attracted 150 responses for this site alone).

7.2 At the meeting of Environment O&S in October 2018, where an earlier version of the Pre-Submission version of LPP2 was considered, officers recommended the removal of all the proposed greenfield site allocations with the exception of the Land at Red Court, Scotland Lane. The Land at Red Court was retained as a proposed allocation because the housing requirement set out in LPP1 for Haslemere could not be met on available urban and rural brownfield sites. The Land at Red Court was considered the most appropriate out of the five greenfield sites previously considered at the Preferred Options stage. It lies outside the AONB, whereas three of the other four sites are within or partly within the AONB (although it is rightly acknowledged that the Land at Red Court is within the 2002 Local Plan designation “AGLV treated as AONB”). The other site that was removed, which fronts onto Sturt Road, also has the designation of AGLV treated as AONB. In reaching the decision at the time, to retain the Red Court site as a proposed allocation, officers also considered the potential visual impact of the development of this site compared with the other greenfield sites that had been included in the Preferred Options version of LPP2. However, at that meeting and subsequently, Members considered that further work was needed to consider whether any greenfield sites proposed in Haslemere in the Preferred Options and the proposed Pre-Submission document at the time were appropriate. Given that the NPPF seeks to prioritise development on brownfield land, officers were asked to consider whether there were any other sites within the urban area or on rural brownfield land that would have the potential to be allocated. Officers were also asked to look at the planned supporting infrastructure for proposed development in Haslemere, particularly the provision of water utilities. Following discussions with the Town Council and the local Waverley Ward Councillors, other options for meeting the housing requirement in Haslemere

without the need for an allocation of a greenfield site were put forward. These options have now been considered and are addressed below.

Considering other urban and rural brownfield sites

- 7.3 Officers have considered the potential of a number of sites within the built up area of Haslemere, or on rural brownfield land, for new housing development. To be allocated in the Plan there needs to be evidence that these sites are suitable in planning terms, available for development, and that development is achievable so that the homes can be delivered in the Plan period (i.e. by 2032).
- 7.4 In order to fully exhaust all potential opportunities for development, in June and July 2020 the Council conducted a “Targeted Call for Sites” to assist with the preparation of housing allocations in LPP2. The Call for Sites emphasised that the Council was particularly interested in identifying any suitable sites within the settlements or on brownfield land. A number of potential sites within the urban area were suggested. Following detailed assessment to consider whether the promoted sites were suitable, available, and achievable during the plan period, some of these sites have been added as proposed allocations in the latest version of LPP2. These are Land at Andrews, Hindhead; Hatherleigh, Hindhead; and 34 Kings Road, Haslemere. Some rural brownfield sites, that are outside the main built up area of Haslemere, were also put forward. Officers have assessed these sites for their suitability, availability and achievability and, as a result, the proposed housing allocations for Haslemere now include land at The Old Grove, Hindhead and The National Trust Car Park adjoining Branksome Place.
- 7.5 A number of other new sites were also promoted, however, further investigation has established that the other suggested sites are either unavailable, unachievable or unsuitable. In some cases, the current occupation of the site for employment purposes is proof that there is a reasonable prospect that the site can continue in that use. On other sites there is no evidence that provides certainty that the housing is deliverable within the plan period. For example, if there exist a number of legal or technical constraints to building that need to be overcome. The Council also received a number of site promotions, whereby they were not directly promoted by landowners for development (for instance promoted by a third party). Such sites do not meet the test of being “deliverable” in the plan period as there is no evidence of their availability. Therefore, they cannot be proposed for allocation in this Plan (LPP2).
- 7.6 Other sites suggested within the Haslemere area either lie within, or partially within, 400m of the Wealden Heaths Phase II SPA, but outside the Hindhead Concept Area. Natural England has advised that no additional residential development can take place within this buffer zone unless there is clear evidence that there will be no significant adverse effect on the SPA from the development.
- 7.7 Officers have looked closely at the potential of the Royal School, Farnham Lane, which comprises a large area of previously developed land. The school is currently operating on two sites and it is understood they intend to move all activities to the other site that lies to the south of Hindhead in due course. This will leave the Farnham Lane site vacant. The School is therefore, promoting this site for redevelopment. Although this is a rural brownfield site, it lies within 400m of the Wealden Heaths Phase II SPA but outside the Hindhead Concept Area. Officers

have discussed the opportunity for residential development with Natural England on the site. They have advised that it would be very difficult for anyone to demonstrate that the existing operation of the school is currently having a significant effect on the SPA. This is because the available evidence shows that existing levels of visitors to the SPA as a result of the school's operation, including both pupils and staff, is very low. In their view, only three dwellings at the very most could be achieved on the site without having a greater impact on the SPA. Opportunities to provide housing in the form of a specialist care home, or other such use which would be likely to not have such an adverse effect on the integrity of the Wealden Heaths Phase II SPA are being actively explored. However, much will depend on the views of Natural England as to the quantum of development that is actually achievable here and, importantly, there is currently not sufficient evidence to demonstrate that the site is deliverable within the Plan Period, to be proposed as an allocation in LPP2 to provide the homes needed to meet Haslemere's identified housing requirement.

Increasing the density of development on sites allocated for housing.

- 7.8 In recognition of the requirement of the NPPF to make effective use of land, officers have reviewed all the urban sites that have been proposed for allocation to see if it is appropriate to increase the yields to maximise the amount of homes. The potential yield on sites where the Council is the predominant landowner: the Fairground Car Park, Wey Hill Youth Campus and the Haslemere Key Site; have been increased from the Preferred Options document that was consulted on in the summer of 2018 for this Pre-Submission version of LPP2.
- 7.9 With regard to the Central Hindhead Site (Barons), Officers have also looked at increasing the yield. However, the yield is the maximum that can be achieved without exceeding the capacity of the 100 dwellings allowed within 400m of the Wealden Heaths II SPA accepted under the Hindhead Concept Area and does not therefore, represent a realistic opportunity.

Increasing the estimated contribution to housing from windfall development

- 7.10 Representations submitted to the Council point out that the amount of homes that have been given permission on windfall sites within Haslemere means that if the past rate of windfall development continues throughout the period that LPP2 covers, there would be no need to build on a greenfield site to meet the housing requirement set out in LPP1. LPP2 therefore, should set out an estimated contribution from windfall development that reflects previous rates of development.
- 7.11 Paragraph 70 of the NPPF states that:
Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.
- 7.12 The approach to windfalls taken for LPP2 maintains exactly the same method used for LPP1 for estimating its contribution to the housing requirement. The approach in LPP1 was independently tested at Examination and the approach was found sound. Maintaining the same approach across both Part 1 and 2 of the Plan removes any risk that the methodology for assessing future windfalls in LPP2 does not accord

with the sound approach that was taken in LPP1. Officers have carefully considered what approach should be taken in relation to windfall estimates in Haslemere. However, it is not considered that there is evidence of specific trends in Haslemere that would justify adopting a different approach to the one used during the preparation and examination of LPP1.

- 7.13 It is recognised that the emerging Haslemere Neighbourhood Plan is proposing a policy that will require a minimum density of 75 dpha within 1 km of the railway station and 45 dpha within the remaining areas. However, currently there is no evidence what opportunities for higher density housing development within the built-up area of Haslemere that the policy requirement will create. It is also not clear what impact the policy will have on the character and appearance of specific areas. As the policy has yet to be examined through the neighbourhood plan process, it is uncertain what future windfall contribution could be realistically estimated as a result of the policy's emergence.

Infrastructure capacity

- 7.14 As a result of concerns expressed at the O&S Environment meeting in October 2018, where an earlier Pre-Submission version of LPP2 was discussed, the Water Utility companies: Thames Water, South East Water and Southern Water held a briefing with Waverley members in November 2019. They repeated their advice that they have a duty to maintain and develop water infrastructure, in terms of both water supply and dealing with waste water, to meet the level of housing planned for the Borough. This is as a result of predicting demand and managing it through the nationwide network. In some cases, the issues with regard to the capacity of existing infrastructure will be resolved through an upgrade to treatment works, but it was made clear that the water infrastructure network was not designed to deal with every eventuality. However, the approach is to meet more sustainable levels of overall water consumption through education and information. They appreciate that not all developers are liaising with them at an early stage with regard to the housing sites promoted for potential allocation. Although they would prefer early engagement with developers, any requirement for water infrastructure will be imposed through planning conditions if planning permission is granted.

- 7.15 In response to these concerns, officers are recommending a new policy in the latest version of LPP2, based on the Thames Water's representations on the Local Plan. This draft policy states that where it is identified that a proposed development will result in an upgrade to off-site water and wastewater infrastructure then phasing conditions will be imposed on planning permission to ensure that the occupation of new homes is in line with the delivery of the upgrade.

Summary of Haslemere housing allocations

- 7.16 As a result of considering the above options, the Pre-Submission version of LPP2 up for consideration by the Environment O&S Committee proposes that the following sites are allocated for housing in Haslemere to meet the outstanding identified requirement of 320 dwellings to be delivered within the Plan period.

Sites	Net Yield
Haslemere Key Site, Haslemere	40

Barons of Hindhead, London Road, Hindhead	38
Wey Hill Youth Campus, Haslemere	40
Haslemere Prep School, The Heights, Hill Road, Haslemere	21
Fairground Carpark, Wey Hill, Haslemere	55
Red Court, Scotland Lane, Haslemere	50
Hatherleigh, Tower Road, Hindhead	5
34 Kings Road, Haslemere	5
Andrews of Hindhead, Portsmouth Road, Hindhead	35
The Old Grove, High Pitfold, Hindhead	18
National Trust Car Park, Branksome Place, Hindhead Road, Haslemere	13
Total	320

7.17 As a result of the increased commitments, yields on the urban sites and the promotion of new sites, officers have been able to remove all greenfield allocations previously proposed in the Preferred Options version of LPP2 on sites within or partially within the AONB in Haslemere.

7.18 However, despite the inclusion of new sites and the increase in yields on some of the existing sites, there are currently not sufficient potentially suitable brownfield sites in Haslemere to meet the full housing requirement as set in LPP1. As a result, the land at Red Court, Scotland Lane, remains a proposed allocation in LPP2 for 50 new homes. The objections to this site received as a result of the Preferred Options allocations referred largely to traffic impacts and concerns over landscape. As previously mentioned, 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 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.

7.19 Members will be aware that 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.

8.0 Housing sites in Witley - including Milford

8.1 It was recognised in Local Plan Part 1 that, in order to meet the housing allocation in Witley parish, it would be necessary to release some land from the Green Belt. The approach taken in the 2018 Preferred Options consultation document was to allocate sites in Milford/Witley that lie in the broad areas for potential adjustment of the Green Belt boundary as indicated by an asterisk in Policy RE2 of LPP1. These were the broad areas that had been first identified in the 2014 Green Belt Review.

These allocations included four sites in Milford, namely: Land at Mousehill Mead, Land at Manor Lodge, Land at Coneycroft and Land at Old Elstead Lane. All these sites lie within the AONB. The Preferred Options document also proposed allocation of Land at Wheeler Street Nurseries, Witley.

- 8.2 In addition to the above, the Preferred Options document proposed a small amendment to the Green Belt boundary to allow for an additional 7 dwellings within the existing site at Highcroft, Milford, albeit this site lies outside an LPP1 asterisked area identified for potential release from the Green Belt.
- 8.3 Witley Parish Council's response to the Preferred Options consultation raised a concern that allocating the four sites in Milford in close proximity to each other would result in over-development. There has also been objection that the development of the four sites would be detrimental to the AONB. As a result of housing commitments and the availability of alternative sites, the previous version of the Pre-Submission LPP2, which was considered by O&S Environment in October 2018, removed two of the four sites for allocation (Land at Mousehill Mead and Land at Old Elstead Lane) and replaced it with two new sites (Land West of Petworth Road and additional land at Wheeler Street Nurseries, Witley; extending the site that was proposed for allocation in the Preferred Options consultation) in order to meet the assessed housing requirement set out in LPP1.

The Milford and Witley allocations now proposed in LPP2

- 8.4 The allocations now proposed for Milford and Witley comprise three sites. Two of these (Land at Highcroft, between Haslemere Road and Petworth Road and Land at Wheeler Street Nurseries) were proposed allocations in the earlier draft pre-submission document. They are relatively small sites (providing 7 and 20 dwellings respectively). The other site now proposed for allocation in LPP2 is the land at Secretts, Hurst Farm, and Milford. The sites at Coneycroft and Manor Lodge, Milford and Land West of Petworth Road, Witley, that were proposed for allocation in the draft Plan considered by O and S Committee in October 2018, are no longer included in the current draft Plan.
- 8.5 The Secretts site is not within one of the broad locations that LPP1 identified as having potential for removal from the Green Belt and was not, therefore, included as a proposed allocation in earlier draft versions of LPP2. However, officers have critically evaluated the situation and have also been mindful of the community support for the allocation of the Secretts site, expressed through the Parish Council. At a Witley Parish Council meeting on Thursday 27th February 2020, the following resolution was made:
- “The preferred location for the majority of the remaining housing that Witley Parish has to deliver by 2032, to meet its target, is land at the Secretts site in the centre of the village of Milford.”*
- 8.6 Given the local support for Secretts to be considered for allocation, the Council sought bespoke legal advice on whether any Green Belt sites lying outside the LPP1 'asterisked' areas could be considered for removal from the Green Belt in LPP2. The advice we have received is that there is nothing in law to prevent the Council from considering sites outside the broad areas identified in LPP1.

However, if the Council were to consider a site outside of these areas then there would need to be clear and cogent reasons for doing so.

- 8.7 As a result of this, the further work that has been undertaken by officers on LPP2 has included assessing promoted Green Belt sites around Milford and Witley, both within the asterisked areas shown in LPP1 and elsewhere. One of these sites that has been assessed is the Secretts Garden Centre. As a key part of the evaluation of sites around Milford and Witley, the Council procured the consultant that undertook the 2014 Green Belt Review for LPP1 to conduct a much more detailed piece of Green Belt assessment work, on a site-by-site basis. The review appraised all sites adjoining the existing settlement and rural brownfield sites, with the exception of sites which would not be suitable for allocation for other reason (for example, sites falling below the minimum allocation threshold of 5 net units or where they were entirely located within 400m of the Wealden Heaths Special Protection Area (SPA)). The assessment considered how the specific sites identified contribute to Green Belt purposes and assessed the potential impact that the development of these sites would have on the Green Belt. This work has gone far beyond that undertaken in the original 2014 Green Belt Review. That study considered larger segments of Green Belt (GB) land and the contribution that those segments were considered to make to the purposes of including the land within the Green Belt. The new GB Study builds on this by considering the contribution to Green Belt purposes on an individual site basis, as well as the potential impact of development on those sites on the Green Belt.
- 8.8 The Study findings were that six sites should be taken forward for further consideration against planning criteria to determine their suitability. These were:
- Land at Franklin Court, Wormley;
 - Land at Wheeler Street Nurseries, Witley;
 - Land at Highcroft, between Haslemere Road and Petworth Road, Milford;
 - Land at Manor Lodge, Milford;
 - Land at Coneycroft, Milford; and
 - Land at Secretts, Milford.
- 8.9 This updated Green Belt evidence has been an important consideration in the assessment of sites for allocation in LPP2. The six sites identified in the new Green Belt Study were assessed as having either 'limited' or 'moderate to limited' harm to the Green Belt. The sites at Highcroft and Wheeler Street Nurseries were assessed as having a limited impact and a moderate to limited impact respectively. Both of these sites are still proposed for allocation. The Land at Secretts was also judged as having a moderate to limited impact. Taking this further Green Belt evidence into account, officers are of the view that this site performs better overall than other sites, including those that were proposed for allocation in earlier draft versions of LPP2.
- 8.10 Clearly there will be some impact on the Green Belt whatever site (or sites) are developed around Milford and Witley. However, this was considered at the time when Local Plan Part 1 was being prepared and examined and the principle of removing land around these villages to accommodate growth was accepted. The reason why officers support the allocation of the Secretts site now, in addition to the updated GB assessment, is because it is considered to perform better than other sites in terms of other land use planning considerations. Unlike the asterisked sites,

Secretts is not within the AONB or AGLV, as a number of other promoted sites are, including the land at Coneycroft and Manor Lodge. The site already contains a number of buildings and structures that represents previously developed land, which is generally preferable to greenfield development. Unlike many of the asterisked sites, it is also well enclosed by existing screening and by existing adjoining development. All of this will help to mitigate the impact of development on the environment.

- 8.11 In sustainability and accessibility terms the site is well located close to existing shops and other services in the village, and its development provides the opportunity for enhancing services and facilities. It is also sited further away from the SPA than a number of other promoted sites. Finally, the site also has a very strong measure of community support expressed by the Parish Council. These important considerations, taken together with the findings of the latest Green Belt assessment, lead the officers to the view that there are now clear and cogent reasons for supporting the allocation of the Secretts site instead of other promoted sites around these villages. Officers are mindful of the fact that one of the sites previously identified for allocation, Land at Coneycroft, performs better than the Secretts site in the new Green Belt study, in that development of this site has been judged as having limited harm as opposed to moderate to limited harm. Notwithstanding this, officers consider that the other benefits of the Secretts site, as summarised above, outweigh the potential benefits of the Coneycroft site in Green Belt terms to the extent that there is clear and cogent justification for its inclusion as an LPP2 allocation, despite not being one of the asterisked sites in the adopted LPP1 document.

Summary of Witley housing allocations

- 8.12 As a result of the above, the Pre-Submission version of LPP2 proposes that the following sites are allocated for housing in the parish of Witley to meet the outstanding requirement of 203 dwellings.

Sites	Net Yield
Wheeler Street Nurseries, Wheeler Lane, Witley	20
Highcroft, Milford	7
Land at Secretts, Hurst Farm, Milford	177
Total	204

9.0 Sites for Gypsy and traveller accommodation

- 9.1 The Preferred Options LPP2 document proposed a number of sites throughout the Borough to meet the accommodation need of 43 Gypsy and travellers pitches and 2 travelling show people that were assessed as needed in the Traveller Accommodation Assessment (TAA) 2018.
- 9.2 However, since then, a number of sites have gained planning permission which can be taken into account in terms of meeting the need assessed in the TAA. LPP2 therefore, now only needs to allocate a further 17 Gypsy and Traveller pitches and no new Travelling Showpeople plots to meet the assessed need.

- 9.3 Policy AHN4 of the LPP1 sets out the sequential approach for identifying sites to allocate for Gypsies, Travellers and Travelling Showpeople. In accordance with the adopted strategic approach, the sites/pitches that officers are recommending that LPP2 allocates involve the re-use or intensification of existing sites. The proposed site allocations are:

Site Name	Net increase in pitches
Burnt Hill, Plaistow Road, Dunsfold	3
Land west of Knowle Lane, Cranleigh	1
Monkton Farm, Monkton Lane, Farnham	5
South of Kiln Hall, St George's Rd, Badshot Lea, Farnham	3
Land off Badshot Lea Road, Badshot Lea, Farnham	2
Old Stone Yard, Tongham Road, Runfold, Farnham	3
Total	17

- 9.4 Guildford Borough Council have raised concerns that LPP2 only seeks 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, in allocating two thirds of the 'unknown' need, the Council is future-proofing itself against future need assessments and changes in the planning definition. The TAA states that the national average of unknown households that meet the planning definition of a traveller is about 10%. Therefore, providing sites to meet 66% of unknown need in LPP2 is a positive reaction to this uncertainty and is similar to the 62% number of known households that meet the planning definition in Waverley. No change to our approach, which officers consider sound, has therefore, been proposed as result of this objection from Guildford.

- 9.5 The need for a transit site was not identified within Waverley borough and therefore no transit site allocations are proposed in LPP2.

10.0 Climate Change and biodiversity

- 10.1 Policy CC1 of the adopted LPP1 sets out our strategic approach for development with regard to mitigating and adapting to the impacts of climate change, and Policy CC2 sets out how sustainable patterns of development and greenhouse gas emissions will be reduced through sustainable design and construction. Policy NE1 of LPP1 sets out the planning measures the Council will undertake to seek to conserve and enhance biodiversity within the Borough. This includes (with Policy NE3 of LPP1) specific approaches to designated sites. Adopted Policy NE2 relates to green and blue infrastructure. The Preferred Options LPP2 documents sought to set out new development management policies that would support these more strategic policies.

- 10.2 In the light of the Council's climate change declaration in 2019, officers have considered the need for any further changes to the Preferred Options version of the Plan in regard to reducing carbon emissions and protecting/enhancing biodiversity within the scope of policy requirements that can be introduced at this stage of plan-making i.e. through a non-strategic plan that must be broadly consistent with the adopted LPP1. The Council has undertaken a viability assessment of the proposed new policy base and the initial findings demonstrate that, based on the assumptions used for testing, the requirements will not make development unviable. Consultants are currently undertaking further testing to address comments made at a stakeholder workshop around the potential impacts of the Covid-19 pandemic on the housing market.
- 10.3 As a result of the above, the key main change to the draft LPP2 is the addition of a new specific policy requiring a level of energy efficiency above that currently required under the national Building Regulations. Officers consider that this policy is consistent with the overarching strategic policies in LPP1. In addition, a paragraph has been added in the supporting text to Policy DM1: 'Environmental Implications of Development' to acknowledge the Council's climate emergency declaration. Policy DM1 itself has been updated to include reference to minimising damage to the environment caused by greenhouse gases and to avoiding negative impacts on biodiversity and delivering biodiversity net gain. Policy DM7 now requires new development to make appropriate provision of electric vehicle charging points in line with Surrey County Council Parking Guidance and any subsequent guidance. In addition, a number of other development management policies have been updated with stronger references to, and emphasis on, enhancing and encouraging biodiversity, sustainability and green infrastructure.

11.0 Other changes

- 11.1 Since the previous Preferred Options consultation, the National Planning Policy Framework was fundamentally revised in 2019. This has meant that a number of proposals previously included in the Preferred Options document are no longer proposed because the NPPF does not allow some policies to be enacted through a non-strategic plan. Such 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.
- 11.2 Members will be aware that, in addition to changes to the settlement and Green Belt boundaries necessary to incorporate the proposed allocations, certain other changes to settlement boundaries were proposed in the Preferred Options document. These changes were minor updates to the boundaries based on previous planning applications, whereas others are factual updates. Dockenfield Parish Council raised concerns about the number of changes proposed to their settlement boundary, so a compromise position is suggested in the draft Plan focusing the changes to areas where permission had previously been granted or in instances where the boundary line did not follow a defensible boundary on the ground. Officers are also no longer proposing that the Shortfield Common settlement boundary should be extended to the north-west to include the part of the village which is in the Countryside beyond the Green Belt. This change is proposed in response to a representation from Frensham Parish Council.

12.0 Comments on the Preferred Options from Statutory Bodies

- 12.1 In response to the Preferred Options consultation, a number of representations were received from statutory bodies. Sport England raised an objection during the Preferred Options consultation, based on a perceived lack of coverage of sport and recreation facilities/policies in LPP2. Officers have responded to the organisation clarifying that sport, leisure and recreation are strategic issues addressed in LPP1 and consequently Sport England have now removed their objection
- 12.2 Natural England requested greater information on landscape impact for the proposed housing sites in 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 also made some useful comments on the heritage policies which have been addressed in the draft Plan before the Committee.
- 12.3 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, the youth campus at Weyhill and some other sites allocated in the Preferred Options document that are no longer allocated in the Plan). These sites have also been assessed for flood risk and more detailed site assessment of flood risk 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 a point that minor infrastructure upgrades may be required to support water supply to the Aaron's Hill development and some sites in Milford, and expressed 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.
- 12.4 Rushmoor Borough Council supports the proposed changes to the Farnham-Aldershot Strategic Gap. No comments were received from any of the following neighbouring local authorities: Mole valley, Horsham, Chichester, East Hampshire, Hart, Spelthorne, Elmbridge or Tandridge Borough Council.
- 12.5 Reigate and Banstead have no objections at this stage but have recommended an additional policy on the siting of caravans and houseboats. Although these types of dwellings are an important source of housing in certain suitable locations and can tackle some of the issues with regard to worsening house price affordability, it is considered that applications for caravans and houseboats will be dealt with under the other development management and housing policies.
- 12.6 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 of the draft Plan but had specific comments on the Coxbridge Employment site, which has subsequently been removed as an allocation.

13.0 Observations from the Overview and Environment Committee on 22nd September 2020

- 13.1 To facilitate considering the pre-submission version of Local Plan Part 2 for consultation the Overview and Scrutiny Environment Committee met on 22nd September 2020 to scrutinise the LPP2 document attached as Annexe 2 to this report. A number of observations were made by the Committee and they have asked Executive to consider whether there is a need to make amendments to the document as a result of them before it is agreed for its Regulation 19 consultation. The local community's concern about the level of housing and the proposed housing allocations for Haslemere was raised. However, there was also support for the proposed housing allocations in Witley. Many of the observations relate to the desire to strengthen the wording of policies in LPP2 or provide greater clarification of their objectives so that they are more robust in managing development. The observations and the officers' response together with the officers' recommended changes to LPP2 are set out in Annexe 3 to this report.
- 13.2 In addition, at the Overview and Scrutiny Committee on 22nd September officers indicated that the text supporting Policy DM10 required updating. This proposed text has been incorporated into the version of LPP2 that is attached as Annexe 2. At the meeting officers also pointed out that it had been suggested that the detailed boundary of the AONB as it adjoins to the site at Red Court, Scotland Lane in Haslemere was incorrect. Officers are still investigating this in consultation with Natural England and an oral update will be given at the meeting.
- 13.3 A change has been made to Map 43 of the pre-submission version of LPP2 that was presented to the Overview and Scrutiny meeting on 22nd September as it incorrectly omitted one of the sites proposed for allocation at the National Trust Car Park at Branksome Place, Hindhead Road in Haslemere (DS09) and also had an incorrect reference number for Land at Wey Hill Youth Campus (DS04) (please note the incorrect map 43 in the Plan shown in Annexe 2 has a single red horizontal line through the centre to indicate that it is to be removed).

14.0 Conclusion

- 14.1 A number of changes have been made to the Preferred Options version of Local Plan Part 2 that was consulted on in the summer of 2018. These take into account the representations made through that consultation. Further changes have been made to ensure that the Pre-Submission version of the Plan maximises urban and brownfield opportunities and takes account of the latest evidence, including the new Green Belt evidence that has informed the site selection in Milford and Witley. Changes to this version of LPP2 have also been made to take into account the Council's declaration of a climate emergency and policies have been strengthened to tackle the serious threat of climate change, to deliver development that is more sustainable, and to protect and enhance the Borough's biodiversity. Subject to the consideration of the matters raised at the Environment Overview and Scrutiny Committee on 22nd September, the Executive is recommended to recommend to the Council that it agrees the draft Pre-Submission Plan for its Regulation 19 consultation.

15.0 Relationship to the Corporate Strategy and Service Plan

15.1 The adoption of Local Plan Part 2 is directly required to ensure that the objectives of the Corporate Strategy are met. In particular LPP2 will support the following:

- facilitate open, democratic and participative governance;
- a financially sound Waverley, with infrastructure and services fit for the future;
- high quality public services accessible for all, including sports, leisure, arts, culture and open spaces;
- a thriving local economy, supporting local businesses and employment;
- responsible planning and development, supporting place-shaping and local engagement in planning policy; and
- a sense of responsibility for our environment, promoting biodiversity and protecting our planet.

15.2 The preparation of Local Plan Part 2 is a key objective for the Council's Planning and Economic Development Service

16.0 Implications of decision

16.1 Resource (Finance, procurement, staffing, IT)

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

16.2 Risk management

The report seeks agreement for Local Plan Part 2 Pre-Submission version to be put forward to the Executive with comments recommendations for their consideration and eventually publicly consulted on under Regulation 19 of the Local Planning Regulations. Any delay to the consultation will delay the Plan's progress to adoption. A sound Local Plan Part 2 needs to be in place to provide detailed policies in accordance with the adopted strategic policies in Local Plan Part 1 so that development that meets the needs of the Waverley community can be managed appropriately.

16.3 Legal

The implications of the proposed allocations and development plan policies are set out and addressed within this report. The legal services team continues to support Planning Services throughout the plan-making process to ensure that any legal requirements are met, including expert internal and external legal advice wherever necessary.

16.4 Equality, diversity and inclusion

There are no direct equality, diversity or inclusion implications in this report. Equality Impact Assessments are carried out when necessary across the council to ensure service delivery meets the requirements of the Public Sector Equality Duty under the Equality Act 2010 and Local Plan Part 2 has been assessed for this purpose. 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.

16.5 Climate emergency declaration

Local Plan Part 2 contains both development allocations and development management policies to support the strategic policies set out in the adopted Local Plan Part 1. They have been prepared in light of the requirement to reduce carbon emissions and mitigate the impact of development on climate change.

17.0 Consultation and engagement

The preparation of Local Plan Part 2 has been subject to public consultation. Issues raised as a result of these consultations form part of the subject of this report

Annexes:

Annexe 1 – Summary of main issues arising from the Preferred Options consultation

Annexe 2 - Copy of the proposed Pre-Submission version of LPP2 for consultation

Annexe 3 – Schedule of observations made at the Overview and Scrutiny Committee meeting on 22nd September 2020.

Background Papers

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

Background papers are those that are referred to in the report, but are not published and accessible to the public.

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