

Annexe 1 to Report to Full Council 20/10/20
Waverley Borough Local Plan Part 2 - Pre-submission version

Summary of the Council's response to representations to the
Waverley Local Plan Part 2 Preferred Options May 2018.

Chapter 2: General Policies

Issue

Policies are missing or there is a lack of detail about how policy is to be implemented with regard to specific planning issues such as delivering affordable housing and providing leisure and recreational facilities.

Officer response

The strategic requirements are set out in Local Plan Part 1 (LPP1) which will have to be read in conjunction with Local Plan Part 2 (LPP2). When LPP2 is adopted, both LPP1 and LPP2 will form the development plan along with any adopted (made) neighbourhood plans in the Borough. In many cases, such as affordable housing and flooding, the strategic policies in LPP1 are detailed and do not need to be duplicated in LPP2. On other matters the Plan has been positively prepared and takes a proportionate approach to each issue and do not cover every situation. Policies have been prepared to comply with the National Planning Policy Framework (NPPF) and take into account the National Planning Practice Guidance (NPPG). Policies therefore have been prepared to provide sufficient flexibility and not hinder development through prescription. LPP2 also cannot deal with issues that are not land use or development matters.

However, changes have been made to policy wording and supporting text to provide clarity and appropriate detail where it has been considered necessary. This includes changes to those policy that will deal with the improving energy efficiency and reducing carbon emissions and protecting biodiversity.

Design

Issue

The space standards should be flexibly implemented to take into account commercial viability. Further clarification should be made with regard to the provision of sufficient amenity space requirements.

Officer response

The viability of LPP2 policies and their requirements have been subject to viability testing. Exceptional circumstances will need to be demonstrated through viability evidence at the planning application stage on a case by case basis rather than set out in policy. The pre-submission version of LPP2 has been amended to provide clarification on the communal amenity space

Transport

Issue

There have been a number of concerns relating to traffic and transport impact and highway safety including for pedestrians from new housing and the measures

proposed to mitigate these impacts in relation to the proposed housing development and individual site allocations. Representations have been made in connection with housing and the provision and improvement of public transport to cater for that uplift in housing.

Officer response

The amount of housing required for each settlement is a strategic policy matter and is set out in LPP1. This should not be changed through LPP2. Where LPP2 is allocating specific sites, then the detailed requirements to deal with transport and traffic impacts will be dealt with as part of the planning application which will need to take into account strategic policy on sustainable transport in LPP1. Any provision and funding for transport infrastructure will be considered either through s106 agreements or through the CIL process depending on the measures needed. In some cases, the concerns set out in representations relate to sites in settlements that the pre-submission version of LPP2 is not allocating for (or is no longer allocating for since the consultation on the preferred options version of LPP2 that was consulted on such as Elstead).

Chapter 3: Location of Development

Settlement boundaries

Issue

The proposed settlement boundaries of Alfold, Chiddingfold, Cranleigh, Docketfield, Frensham, Elstead, Godalming, Haslemere, Witley and Wonersh all received comments. Some of them were in support but some questioning the reasoning behind the re-designation.

Officer response

Some changes were factual changes based on minor changes, whilst others on physical elements of the settlement. Some changes have been made to Docketfield and Frensham in response to their representations. The basis for the changes are contained within the Settlement Boundary Topic Paper. Some towns or parishes have decided to incorporate a review of the settlement boundary as part of their neighbourhood plan process.

Managing development in the Green Belt

Issue

There were a number of representations in relation to the proposed Green Belt boundaries for Chiddingfold and Elstead set out in the preferred options. Representations on the Green Belt boundaries proposed for Milford and Witley relate to the site allocations in those settlements.

Officer Response

Since the revision of the NPPF in 2019, neighbourhood plans can now undertake detailed changes to Green Belt boundaries whereas before this could only be done through a Local Plan. As Chiddingfold and Elstead are now doing their own site allocations in their neighbourhood plans they are also undertaking their Green Belt boundaries.

Issue

The policy restricting extensions to houses in the Green Belt should be applied to houses in the countryside beyond the Green Belt. Furthermore the policy allowed should take a consistent approach to the amount an extension to a house in the Green Belt can be extended and how much bigger a replacement house can be. There were other representations with regard to the detailed wording of Policy DM12 which relates to development in rural areas.

Officer response

The policy approach to both extensions to dwellings and replacement dwellings accords with the NPPF. No change to the policy in the pre-submission version of LPP2 is therefore necessary as a result of these representations but changes have been made to the wording of the policy to clarify that the functional needs of forms of development are taken into account when considering proposals and to avoid any repetition with other policies with regard to habitats and landscape features.

Chapter 4: Protecting Places

Local Landscape Areas

Godalming and Haslemere Hillsides

Issues

A few representations making suggestions for inclusion or exclusion of both areas of Hillside policy. Generally a positive view of the policies.

Officer response

The policy in the pre-submission version has been amended to reflect some of the suggestions. Neighbourhood plans can also consider amendments where appropriate.

Farnham/Aldershot Strategic Gap

Issues

General support for the policy.

Officer response

Support welcomed

Areas of Strategic Visual Importance (ASVIs)

Issues

Support for ASVIs and several recommendations for the inclusion or exclusion of sites within an ASVI

Officer response

Much of the detail regarding the allocation of ASVIs is contained within the topic paper. Certain sites are excluded due to other constraints such as Green Belt and others as they are not considered suitable.

Local Green Spaces

Issue

Overwhelming support for the policy with individual sites being put forward for inclusion. Some representations were unsure as to why certain sites were not included.

Officer response

The analysis for the suggested sites is contained within the Local Green Space topic paper. In addition, neighbourhood planning groups have been assessing and in some cases allocating local green spaces within their neighbourhood plans.

Heritage assets

Issue

Several comments on the definition of heritage terminology and the assessment of sites by officers. Suggestions have been made concerning changing the phrasing of terminology within the various heritage policies. Overall, general support of the various policies

Officer response

The phrasing within the policies reflects both legislation and the NPPF, which avoids ambiguity in its implementation.

Chapter 5: Economic prosperity

Employment, Training and Education

Issue

Concern that the employment sites are not mapped. Also there is no provision of Class B employment sites in Cranleigh, which will not support the proposed 1700 new homes in the village. A representation concerning the lack of employment opportunities in Haslemere at the expense of housing. However, expressions of support were made.

Officer response

There is no need to map each employment site as the policy makes it clear which sites the policy relates to. Furthermore, mapping changes occur in real time and it is difficult to keep maps updated and the council monitors the provision of employment land. The Cranleigh Neighbourhood Plan may allocate employment sites and the new nearby Dunsfold Park will offer numerous employment opportunities. However, LPP1 sets out strategic policies to ensure provision of sufficient employment land in the Borough over the plan period to meet assessed need and to ensure that this provision is balanced with the need for housing.

Development within town centres

Issue

There should be an emphasis that town centres should remain mixed use: entertainment, leisure, retail etc. Also concern that residential should not come to dominate the town centre at the expense of the other mixed uses. There should be encouragement to utilise more active modes of transport when visiting the town centre.

Officer response

Specific references to themes such as health, education, entertainment, leisure, arts and crafts are covered in Adopted LPP1 Policy TCS1: Town Centres. As part of the climate emergency, specific reference to active modes of transport are incorporated within the policy.

Advertisements

Issue

Consideration should be made of signage within conservation areas and on heritage assets.

Officer response

This specific issue is dealt with in the Shopfronts Design Guide SPD is a material planning consideration in determining an application. Therefore there is no need to amend LPP2.

Telecommunications

Issue

Concern has been raised regarding good broadband connections and mobile coverage particularly in the more rural parts of the borough.

Officer response

Local Plan Part 1 (LPP1) Policy CC2: Sustainable Construction and Design, requires that “all new buildings are provided with the highest available speed broadband infrastructure.”

Tourism, and recreation

Issue

Where is the “need” for tourism assessed and suggestions that the provision of visitor accommodation should be focused in the town centres as they would be more sustainable? Should development that may result in the loss of visitor accommodation be resisted? Also any potential development of existing leisure sites into other uses should take account of viability reports deeming them unprofitable.

Officer response

The Council will consider the need and justification for any development in rural locations, including tourism, in line with the NPPF. Officers do not consider specific reference to town centres is necessary as tourism uses are considered main town centre uses in the NPPF and therefore would be supported by policy TCS1. Visitor accommodation makes important contributions to the local urban and rural economies and therefore officers are of the view that the protection in the policy is justified and in accordance with the NPPF. The explanatory text with supports the policy has been updated to include further details of the evidence which will be required to support a change of use from tourism uses.

Access to the countryside

Issues

General support

Officer response

Welcomed and noted

Chapter 6: Housing Policies

Self-build and Custom Housebuilding

Issue

A number of representations were concerned that the viability of schemes may be affected if the policy were adopted and what evidence would be needed to make an exception to the requirement to provide self-build and custom houses in the policy proposed in the preferred options consultation. There were also numerous comments supporting the policy.

Officer response

The LPP2 policy requirements, including the custom and self-build policy, have been subject to viability testing and were not found to make development in the Borough unviable. However, if there is evidence that meeting the policy requirement is not viable on a particular site, the policy does set out that the Council may negotiate a portion of custom and self-build housing which is achievable on the site.

Chapter 7: Housing Sites

Delivering New Housing

Issue

Most of the representations relate to the LPP2 specific site allocations. However there have been some relating to delivery meeting the overall housing requirement including delivering five years' worth of housing supply.

Officer response

The housing requirement for the Borough and for individual settlements is a strategic matter and is set out in LPP1. This also applies to delivering five years' worth of housing supply. Therefore, there is no need to revisit this under LPP2. However, there is a need to ensure that enough houses are planned for to meet the housing requirement in those settlements that LPP2 is allocating sites for: Haslemere and Witley (Godalming has already met its target so LPP2 no longer includes any specific allocations for the settlement). Where there is a need for housing to be planned for to meet the strategic requirement set out in Policy ALH1 of LPP2 in other settlements, the local community is allocating sites in their Neighbourhood Plans.

Issue

LPP2 does not deal with the contingency that neighbourhood plans may fail to deliver the housing required in LPP1.

Officer response

Planning legislation allows communities to prepare neighbourhood plans if they choose to do so and this includes allocating sites to meet their housing requirement. LPP2 therefore only seeks to allocate sites in those settlements where the local community has chosen not to do so through a neighbourhood plan. These are, Haslemere and Witley (Godalming has already met its target so LPP2 no longer includes any specific allocations for the settlement). The role of LPP2 is to plan to meet the housing requirement in LPP1 in these settlements only. If it sought to

allocate sites or set out a process for doing this, it would undermine the local community's preparation of their neighbourhood plans. Waverley has a duty to assist in the preparation of neighbourhood plans and will be working with the local community to meet their housing requirement. However, this is not a responsibility of LPP2.

Issues

Representation relate to the sites that were preferred as allocations to meet the housing target for the specific settlements that LPP2 is allocating sites for: Godalming, Haslemere, Elstead and Witley/Milford. There were a number of objections to greenfield sites in Haslemere. There were also representations promoting alternative sites to the ones proposed

Officer response

Some of the representations relate to sites in Godalming. Godalming no longer requires site allocations as their strategic housing requirement has now been met. They also refer to sites in Elstead. However, since the preferred options consultation Elstead Parish Council and Peper Harow Parish have decided to allocate housing sites in the Elstead and Weyburn neighbourhood plan. In terms of representations on sites that are in settlements that LPP2 is allocating sites for, since the preferred options consultation, some of the sites now have planning permission and therefore do not require an allocation. Where the sites still require an allocation, then the pre-submission version of LPP2 has considered those matters in determining the appropriateness of allocations for housing development in these settlements.

New sites for Gypsies, Travellers and Travelling Showpeople

Issue

There were representations with regard to the general provision of sites and their distribution, particularly at Lydia Park and at Runfold.

Officer response

Government policy is that Local Plans have to meet the accommodation need assessed through the provision of sites that can be delivered and there is no scope for not providing sufficient pitches and plots. The approach that the Council has to take is set out in Policy AHN4 of the adopted LPP1 and the preferred options version on LPP2 accord with this strategic policy. Changes to the pre-submission version have been made to update the situation with allocating enough pitches and plots to meet traveller need to take into account the deliverability of sites and sites that have already been granted permission.

Site allocations

Issues

Sites were put forward by consultees as possible development land that should be allocated in LPP2, primarily within Haslemere. These have been promoted as an alternative to Red Court but also as allocations in their own right.

Officer response

All sites have been noted and assessed as part of the allocation process.

