

WAVERLEY BOROUGH COUNCIL

ENVIRONMENT OVERVIEW & SCRUTINY COMMITTEE 20TH SEPTEMBER **EXECUTIVE 22ND SEPTEMBER 2021** **COUNCIL 22ND SEPTEMBER 2021**

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 The Council consulted on the Pre-Submission Local Plan Part 2 (LPP2) between the 27th November and 29th January 2021. The consultation resulted in 1242 comments from 418 individual respondents.

1.2 In response to the representations the Council received on the Pre-submission version of LPP2, this report seeks comments and observations from the Overview and Scrutiny committee on the proposed recommendations to Executive and Council that:

- a) the Council should carry out a further public consultation focussed on changes to the proposed housing site allocations for Haslemere in the Pre-submission version of LPP2, before it submits the plan to the Secretary of State for its examination.
- b) the Council submits to the examination other changes to the Pre-submission version of LPP2 that are not subject to public consultation following the submission of the plan to the Secretary of State.

1.3 Following this pre-decision scrutiny by the Environment Overview & Scrutiny Committee, approval is sought from the Executive and Full Council on the 22nd September 2021 to undertake this focussed consultation.

2.0 Recommendation

2.1 That the Executive considers the comments and observations of the Overview and Scrutiny Committee and makes the following recommendations to full Council:

- 1) That Council agrees the changes to the Pre-submission version of LPP2, set out in the Addendum attached as Annexe 1 to this report concerning the proposed housing site allocations in Haslemere and that the Council undertakes a public consultation on the Addendum for a period of 6 weeks under Regulation 19 of the Local Planning Regulations.
- 2) The Council agrees that the schedule of other minor changes to the pre-submission version of LPP2 that have not been the subject of public consultation, set out in Annexe 2 to this report, be submitted to the examination of LPP2.
- 3) The Head of Planning and Economic Development be authorised to formally request that the Local Plan Examination Inspector recommends further main modifications to LPP2, if the Inspector considers that they are necessary to make the plan sound and/or legally compliant.
- 4) The Head of Planning and Economic Development be authorised to make any other minor modifications to the Pre-Submission version of LPP2 with regard to factual updates and corrections before the Plan is submitted for its examination.

3.0 Reason for the recommendation

- 3.1 To enable the Executive to consider the comments of the Environment Overview and Scrutiny Committee and make recommendations to the subsequent meeting of the Council on the recommendation to modify and consult on the main modifications to the pre-submission version of LPP2 before the Council formally submits it to the Secretary of State for examination.

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 strategic development allocations. LPP2 sets out the detailed policies and allocations consistent with the strategy adopted in LPP1. More specifically it:

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

- 4.2 The key stages for preparing LPP2 are as follows; this timetable includes the proposal to complete a consultation of the Addendum to the Pre-Submission Plan, details of which are given within this report:

- 1) Preferred Options consultation – Summer 2018
- 2) Consideration of changes to LPP2 from the representations to the Preferred Options – Autumn 2018
- 3) Preparation of the Pre-Submission Plan - 2018 to 2020
- 4) Pre-Submission Plan consultation - Winter 2020/21
- 5) Consultation on the Addendum to the Pre-Submission Plan – October/November 2021
- 6) Submission of LPP2 to the Secretary of State for examination including any proposed minor modifications to be made as a result of the representations made on the Pre-Submission Plan consultation and Addendum to the Pre-Submission Plan consultation - December 2021
- 7) Examination - anticipated May/June 2022
- 8) Inspector's Report on LPP2 Examination (anticipated September 2022)
- 9) Adoption (anticipated September/October 2022)

- 4.3 By approving the Pre-Submission version of LPP2 for consultation between 27th November 2020 and 29th January 2021, the Council agreed that this version of LPP2 was the plan that the Council considered was sound and should submit to the Government for examination. Any representations received as a result of this consultation will be submitted to the Government as part of the examination.
- 4.4 The legislation on plan preparation states that the Council must only submit their plan for independent examination if they consider it to be sound. The Planning Inspectorate's Procedure Guide for Local Plan Examinations advises that once the plan has been submitted the Council can formally invite the Inspector to recommend changes that would be required for it to be found sound and/or legally compliant.
- 4.5 However, if the Council wants to formally make main modifications to LPP2 so that they form part of the plan to be examined the Council must consult on those modifications before the plan is submitted. Therefore, the Procedure Guide for Local Plan Examinations advises if the LPA wish to make changes to the plan following the Regulation 19 consultation and before submission, and wish the changes to be considered as part of the submitted plan, they should prepare an addendum to the plan containing the proposed changes. This Addendum, together with a sustainability appraisal (SA) and Habitats Regulation Assessment (HRA) of the proposed changes must then be consulted on the same basis as a Regulation 19 consultation. This means that the Council cannot make main modifications to LPP2 after it has been submitted for examination.
- 4.6 The Procedure Guide for Local Plan Examinations also says that LPAs sometimes submit to the examination a list of proposed changes to the plan that have not been the subject of consultation. The Inspector will not treat those proposed changes as part of the plan to be examined. However, the Inspector may consider it appropriate for some or all of the LPA's proposed changes to be discussed at the hearing sessions, and in appropriate circumstances they may form the basis for main modifications to the plan.
- 4.7 The Council may also make additional (minor) modifications to the plan on adoption, but only if they do not materially affect the plan's policies. Minor modifications are not subject to the formal examination process.

5.0 The Consultation on the Pre-Submission version of LPP2

- 5.1 A summary of the issues raised chapter by chapter through the representations on the Pre-Submission version of LPP2 and the Council's proposed response to the issue is set out in Appendix 3 to this report. Annexe 4 sets out a summary of representations made by consultees on LPP2.
- 5.2 This next section of the report focuses on the main issues that were raised through the comments on the Pre-Submission version of LPP2 and the Council's proposed response, particularly in regard to the following:
- Meeting the housing requirement in LPP1.
 - Specific site allocations to meet the housing required in Haslemere
 - Specific site allocations to meet the housing required in Witley/Milford
 - Specific site allocations to meet the housing required to meet traveller accommodation needs across the Borough.
 - Climate Change and biodiversity.
 - Other policies in LPP2
 - Other comments from statutory bodies.

6.0 Meeting the housing requirement in LPP1

- 6.1 LPP1 Policy ALH1 sets out the amount and location of housing. Although some strategic sites were allocated in LPP1 to meet the amount of housing required by this policy, LPP2 and/or neighbourhood plans have a continuing role in relation to making detailed housing allocations. LPP2 is proposing to allocate sites to meet the housing requirement in LPP1, but only for Haslemere and Witley/Milford. This is because these are the only settlements where either the town or parish has decided not to allocate housing sites in their neighbourhood plan or that that the housing requirement set out in LPP1 has not yet been met.
- 6.2 At the time of the consultation on Preferred Options for LPP2 in the summer of 2018 it was envisaged that LPP2 would also deal with housing allocations in Elstead and Weyburn, and for Godalming. However, since then Elstead Parish Council and Peper Harow Parish Meeting have been preparing their Neighbourhood Plan that includes housing allocations. For Godalming, the minimum housing target of 1,520 required by LPP1 has already been exceeded by 177 dwellings as of the 1st April 2021. As a result, housing allocations for Godalming are no longer required in LPP2.
- 6.3 Despite LPP2 only allocating sites in Haslemere and Witley/Milford, there have been several comments on the Pre-Submission version of LPP2 that it should allocate more sites in other settlements. This is because respondents are concerned that not enough housing is being planned for in other settlements to meet the minimum housing requirement set out in LPP1. This would mean that not only would the housing required for the settlement itself will not be met, but also that it will not deliver enough housing to meet the overall requirement for the whole Borough. Furthermore, there is currently not enough housing to meet five years' worth of deliverable sites as required in the NPPF. Similarly, it has been commented that it is unrealistic to consider that some of the sites will deliver enough housing in the plan period (up to 2032) or the five-year period, even though they have already been allocated and received planning permission. Respondents consider that this issue is exacerbated because the housing requirement is not based on the standard method

that is set out in the NPPF for assessing how much housing is needed. If it was, even more housing would now be needed than is required in LPP1.

- 6.4 However, to change the amount of housing required for the Borough and where it should be distributed goes beyond the role of LPP2, which provides the detail to the adopted strategy in LPP1. To provide for housing in LPP2 in those settlements where the community has decided to undertake neighbourhood plan allocations would undermine that process. If there is evidence that sites cannot be delivered in accordance with the amount and location of housing in LPP1, then this would necessitate a change to that plan rather than delivery through LPP2. The NPPF states that a review of a local plan, to decide whether it needs to be updated, should be undertaken at least once every five years. Therefore, as LPP1 was adopted in February 2018, the review to decide whether LPP1 should be updated, must be completed by February 2023. That review process will consider both the delivery of the housing required to meet the LPP1 requirement, and any changes in the need for housing arising from the latest Government methodology.

Summary of modifications to meeting the housing requirement in LPP1

- 6.5 In the light of the above, it is not recommended that any modifications are made to LPP2 in response to representations relating to the need for it to meet the strategic housing requirement in LPP1.

7.0 Housing sites in Haslemere

- 7.1 The Pre-Submission version of LPP2 proposed the allocation of the following sites in Haslemere in Table 1 below to meet the outstanding identified requirement of 320 dwellings as of 1st April 2020 to be delivered within the Plan period.

Table 1 – Allocated Housing Sites consulted on in the Pre-Submission version of LPP2 for Haslemere November 2020

Ref	Sites	Net Yield (no of dwellings)	Site area (ha)
DS01	Haslemere Key Site, Haslemere	40	2.5
DS02	Barons of Hindhead, London Road, Hindhead	38	1.6
DS03	Andrews of Hindhead, Portsmouth Road, Hindhead	35	0.55
DS04	Wey Hill Youth Campus, Haslemere	40	1
DS05	Haslemere Prep School, The Heights, Hill Road, Haslemere	21	1
DS06	Red Court, Scotland Lane, Haslemere	50	4.9
DS07	Fairground Car Park, Wey Hill, Haslemere	55	.6
DS08	The Old Grove, High Pitfold, Hindhead	18	0.78
DS09	National Trust Car Park, Branksome Place, Hindhead Road, Haslemere	13	0.4
DS10	Hatherleigh, Tower Road, Hindhead	5	0.49

DS11	34 Kings Road, Haslemere	5	0.3
	Total	320	

- 7.2 The housing supply position for Haslemere has changed since the Pre-submission version of LPP2 was consulted on. However, this change is very minor. Taking into account the number of new dwellings already committed in the settlement as a result of completions since 2013 and outstanding planning permissions, there is a need to allocate sites to deliver at least 316 dwellings to meet the housing requirement of 990 dwellings as of 1st April 2021.
- 7.3 The housing allocations in LPP2 for Haslemere have attracted objections, both from the promoters of sites that have been omitted from the Plan as well as from residents and other groups and organisations concerned about the suitability of the sites proposed for allocation in LPP2. The concerns that have been raised include the impact of development on infrastructure and the impact on physical and environmental constraints; the number of comments and the issues raised received on each site varied. There were also concerns about whether some of the sites will come forward in time to deliver the proposed housing within the Plan period.
- 7.4 Officers have taken careful note of the comments made on the sites proposed for allocation in Haslemere in LPP2. Officers have also been mindful of new sites that emerged during the consultation on the Pre-Submission Plan. The officer view is that with one exception the sites proposed for allocation should remain as proposed housing allocations. Generally, the comments regarding the detailed impact from housing development on each of the sites would be managed through the planning application process and the application of both existing policies in LPP1 and development management policies (either the retained policies in the 2002 Local Plan or the new policies in LPP2).
- 7.5 Some of the sites have been challenged on the grounds of their achievability and deliverability. The Local Plan period runs until 2032 and, therefore, to make a contribution towards meeting the LPP1 housing allocation, sites need to come forward and development must be completed by 2032. Officers recognise that some sites may take longer to come forward than others due to specific issues such as multiple uses or the likely need to relocate existing uses. However, none of the housing allocations proposed are of such a scale that officers consider that they could not be delivered by 2032. The overall conclusion is that these sites are capable of being delivered within the Plan period.
- 7.6 With the exception of land at Red Court, the sites proposed for allocation in Haslemere in the pre-submission Plan are either previously developed land or lie within the existing settlement boundary for Haslemere, or both. They are also well connected in that they are close to public transport, services and facilities. Most of the sites are also of a small to medium size, which the NPPF recognises as being an important contribution to the housing required in the area because they can be built out relatively quickly.
- 7.7 180 comments were received on the proposed allocation of Red Court, Scotland Lane. These commented on the impact on the character of the area, impact on the landscape including the setting of the AONB and the setting of the adjacent South Downs National Park, the impact on the natural environment, the impact on the listed

building on the site and the impact on local highways. There have also been objections to the proposed allocation on the grounds that infrastructure is inadequate to support the development. Comments also stated that the allocation would be contrary to the Haslemere Neighbourhood Plan because the neighbourhood plan excludes the site from the Haslemere settlement boundary and there is a presumption against the development of sites in this location. Objectors point out that there are brownfield sites in Haslemere that should be allocated as an alternative to Red Court.

- 7.8 Whilst it would be preferable and more in line with the NPPF if the required housing allocations for Haslemere were on previously developed land, it was recognised at the time when the Pre-Submission version of LPP2 was prepared and published for consultation, that it was not possible to identify sufficient sites to meet the LPP1 requirement without considering greenfield sites on the edge of the settlement. Of the greenfield sites promoted at the time, the land at Red Court was considered to be the most suitable and was included in the Preferred Options consultation. The site lies outside the AONB, whereas three of the other four sites that were considered as Preferred Options for LPP2 (Land East of Longdene House, Land North of Haslemere Saw Mills, and Longdene Field) are within or partly within the AONB (although it is rightly acknowledged that the Red Court site is within the 2002 Local Plan designation “AGLV treated as AONB”). The other site (Land South East of Haslemere Water Treatment Works) was also in “AGLV treated as AONB”.
- 7.9 However, since the consultation on the Pre-Submission version of LPP2, an application for residential development on the land at Red Court (WA/2020/1213) has been refused. The refusal of the planning permission included the grounds that the proposal would result in harm to the intrinsic character and beauty of the Countryside and fail to respect the landscape character of the Area of Great Landscape Value (AGLV). The proposal was also considered to harm the setting of the Area of Outstanding Natural Beauty (AONB). Accordingly, the proposal would therefore be contrary to Policies RE1 (Countryside beyond the Green Belt) and RE3 (Landscape Character) of the Local Plan Part 1 (2018), along with guidance contained in the NPPF.
- 7.10 In reviewing the representations on LPP2 and deciding how to take the Plan forward for submission, officers have been mindful of the concerns regarding development of the land at Red Court. However, LPP2 still needs to provide the housing required under adopted strategic Policy ALH1 for Haslemere if it is to be found sound. As set out above in paragraph 7.2 of this report, there is still an outstanding requirement to allocate sites in LPP2 to deliver 316 dwellings to meet the minimum 990 homes required in LPP1 using a base date of 1st April 2021. This means that if the allocation of Red Court site were to be removed from LPP2 there would be a shortfall of 46 dwellings to meet the strategic housing requirement for Haslemere. As such, another site or sites that are more suitable for housing development in planning terms than the land at Red Court would need to be allocated in LPP2.
- 7.11 As stated above, the land at Red Court was proposed as a housing allocation in the Pre-Submission version of LPP2 because the housing requirement set out in LPP1 for Haslemere could not be met on available urban and rural brownfield sites. However, the objections to the allocation at Red Court in the Pre-Submission version of LPP2 included suggestions that there were other suitable previously developed sites in Haslemere that should be preferred as an allocation. As a result of the

consultation on the Pre-Submission version of LPP2 several sites have indeed been promoted for allocation as housing sites in the Plan.

- 7.12 One of the sites currently accommodates the Royal Junior School in Hindhead. This site lies adjacent to the A3 to the south of roundabout at the end of southern carriageway slip road after the Hindhead Tunnel. This site will become available for housing once the Junior School relocates to the Senior School that currently operates from the Farnham Lane site in Haslemere. The Royal Junior School site is within the AONB but is also previously developed land, albeit that the buildings and hard surfaces tend to be concentrated on the northern and eastern parts of the site. Officers have thoroughly assessed the potential suitability of the site as well as the implications in planning terms of the Junior School being relocated to Farnham Lane. It is recognised that it is more remote from Haslemere and Hindhead than other sites that have been considered, including the Red Court site. However, it is also very well screened, particularly from the A3 to the west. The Council's landscape consultant has also assessed the site and concluded that the overall sensitivity in landscape terms is 'Low to Medium Sensitivity'. Having regard to the existing uses and the existing degree of screening, officers are of the view that, in principle, the site is suitable for residential development in place of existing uses. It is considered that an appropriately designed development of approximately 90 dwellings that would respect the landscape character of the area and provides mitigation for the impact on the Wealden Heaths SPA would be achievable and is deliverable within the Plan period.
- 7.13 It is recognised that there are potential implications arising from the proposed relocation of the Junior School to the existing Royal School Senior School site on Farnham Lane, Haslemere. One of these is traffic, given the restricted nature of Farnham Lane. However, the site promoters are in active discussions with Surrey County Council to make arrangements to control vehicle movements to and from the School, notwithstanding the increase in pupil numbers. The Farnham Lane site is also within the Green Belt and AONB. However, the School believes that it can achieve the relocation through the reuse and replacement of buildings, rather than requiring significant new development.
- 7.14 Another site promoted for housing development is the Old Grove, High Pitfold, Hindhead. The site is already proposed for an allocation in the Pre-Submission version of LPP2 for 18 dwellings on part of the site. However, since the consultation on the pre-submission LPP2 was carried out, more of the site is now available which currently provides specialist residential care accommodation and a range of specialist services. The site is being promoted for 40 dwellings as a result of the proposed intensification and reconfiguration of the existing C2 accommodation. The site is within the AONB, however the redevelopment of the site which is already comprehensively covered by built form will not have a detrimental impact on the national landscape designation. This assessment is echoed by the Council's landscape consultant who has assessed the site and concluded that the overall sensitivity in landscape terms is 'Low sensitivity'.
- 7.15 The Royal Junior School and the Old Grove, High Pitfold are previously developed land and sites which are both visually well screened. It is therefore considered that with appropriately designed redevelopment, the sites could ensure that they only have a low impact on the AONB. The development of these sites would be more in line with the spatial strategy in LPP1 than the development of Red Court, where it is

considered that the development of this greenfield site would result in harm to the countryside and the AGLV that the site lies within as well as to the setting of the AONB. Officers therefore consider that The Royal Junior School, Hindhead and a larger site at the Old Grove, High Pittfold should be proposed as allocations in LPP2 and that the existing proposed allocation of Red Court, Scotland Lane be removed.

7.16 Additionally, since the Council consulted on its Pre-Submission version of LPP2 evidence shows that that the proposed yields on some sites proposed for allocation needs to change which would justify a main modification to LPP2. These sites are:

- DS01: Haslemere Key Site, West Street, Haslemere – in the Pre-Submission version of LPP2 the site was allocated for at least 40 dwellings; in light of some of the concerns raised regarding the proposed yield for this site, officers consider a reduction of the yield to at least 30 dwellings is appropriate.
- DS04: Land at Weyhill Youth Campus - allocated for 40 dwellings. Since the Pre-Submission version of LPP2 it has been confirmed that the lease of the scout hut to the Scouts has been extended. Therefore, it is proposed to reduce the site area to take account of this. Accordingly, it is proposed that the site is now appropriate for a yield of 34 dwellings to reflect the reduced area of the proposed allocation.
- DS05: Haslemere Preparatory School, The Heights, Hill Road, Haslemere – allocated for 21 dwellings. In June 2021, the site gained planning permission via appeal (WA/2018/1771) for the erection of 25 dwellings following the demolition of the existing school buildings and existing dwelling (net 24 dwellings). Accordingly, it is proposed that the net yield for this allocation is amended to 24 dwellings.
- DS07: Fairground Car Park, Wey Hill, Haslemere - In the Pre-Submission version of LPP2 the site was allocated for at least 55 dwellings. In light of some of the concerns raised regarding the proposed yield for this site officers consider a reduction of the yield to at least 20 dwellings is appropriate to acknowledge the site's potential for mixed-use development and the need to retain parking spaces on it where possible.

7.17 As the Council has not consulted on the above in the Pre-Submission version of LPP2 and given that there is no provision in the legislation to amend LPP2 once it is submitted for examination, if the Council wants these new allocations and any changes to yields on any other sites to form part of LPP2 to be examined, the changes need to be made through an Addendum that will be subject to a focussed public consultation before LPP2 is submitted for its examination.

7.18 The removal of Red Court, the inclusion of the Royal School site; the increased yield on the Old Grove as a result of the larger site area; and the changes to yields on other proposed allocations means that the overall allocation for Haslemere would be 18 dwellings above what is required to achieve the minimum housing requirement for Haslemere as of 1st April 2021. Officers believe that this provides a degree of contingency in the event that any of the other sites do not come forward after all. Officers have also taken the opportunity to reduce the numbers proposed for allocation on the sites which it is acknowledged may take longer to bring forward (the Town Centre Key Site and the Fairground Car Park). This is not to say that these

sites are not potentially capable of delivering more homes; it simply reduces the reliance on these sites in the event that the Inspector has any concerns about their deliverability within the Plan period.

- 7.19 At the time the Pre-submission Plan was being prepared, Officers were mindful that, depending on the size of the site, some form of mitigation may be required for sites around Haslemere in view of the proximity to the Wealden Heaths SPA. As it stands, there is no adopted avoidance strategy for the Wealden Heaths SPA, so sites do have to be considered on a case-by-case basis and this is set out in LPP1. Paragraph 16.28 of LPP1 states *“if a housing proposal is capable of affecting the Wealden Heaths Phase I and II SPAs beyond 400 metres from the site, it will be considered on a case-by-case basis as to whether a project-specific Habitats Regulations Assessment (HRA) is required (this should be assessed at the HRA Screening Assessment stage). The requirement is likely to vary depending on the size of site, the ‘in-combination’ effects and its distance from the SPA. Larger developments will not normally be acceptable and the total number of dwellings permitted in this zone overall will be closely monitored. Further advice should be sought from and agreed with Natural England”*.
- 7.20 Notwithstanding the absence of a formal avoidance strategy for the Wealden Heaths SPAs, Natural England has expressed the view that as there are some site allocations in LPP2 within 5km of the Wealden Heaths SPA, there would need to be mitigation in some form, including SANG, where appropriate. Within the Local Plan, stronger wording surrounding mitigation of these specific allocations is needed, e.g., the need for some form of mitigation for allocations of 20-49 dwellings and mitigation in the form of SANG for allocations of 49+ dwellings should be specified. Wording should explain that mitigation approaches must be agreed with Natural England and Waverley BC and on a case-by-case basis.
- 7.21 In Haslemere there is now only the one site that is proposed to be allocated for 50 or more dwellings and another five sites allocated for 20 dwellings or more. It should be noted that for all the allocations in Haslemere there is already a criterion in the Pre-Submission version of LPP2 pointing out the need to demonstrate that there would be no likely significant effect on the SPA before development can come forward.
- 7.22 The Inspector for LPP1 stated in para 114 of his report on the examination of LPP1 that *“(Haslemere) is close to the Wealden Heaths Phase II SPA but, due to the amount of natural greenspace in the area, SANG is not the only potential mitigation measure and there is no need for a strategic SANG. Discussions have taken place with the National Trust to discuss possible projects that could mitigate development in the area. Development will be mitigated on a case-by-case basis as agreed with Natural England. The strategy is sound”*.
- 7.23 It is therefore considered that the current LPP2 allocation criterion that requires development to demonstrate that it is not likely to have a significant effect on the Wealden Heaths SPA is consistent with this strategy and there is no need to modify LPP2 except to make it clear that any avoidance and mitigation measures proposed will be in consultation and with agreement from Natural England. Nevertheless, in order to provide greater certainty that the allocated sites can be delivered, the Council is looking at what mitigation measures can be implemented which includes the feasibility of local open space being used for recreational purposes as an alternative to visiting the SPA. This work is ongoing.

7.24 Historic England have objected to some of the sites proposed for allocation on the grounds that the impact on the historic environment has not been carried out. It is considered that these are matters that are more appropriately managed through a planning application but where the matter is not set out as a criterion in the relevant allocation policy it is considered that this should be added as a minor modification which will be submitted alongside the Plan.

7.25 Some respondents have questioned the assumptions used to estimate the contribution of windfalls to meet the housing requirement. However, the reliance on a contribution of housing on windfall sites accords with the NPPF and the assumptions used are the same ones adopted in LPP1 following its examination. It is entirely appropriate to use the same assumptions and methodology as were agreed for Part 1 of the Local Plan

7.26 The new sites have been the subject of Sustainability Appraisal and Habitats Regulations Assessment and they are consistent with the findings of the SA and HRA for LPP2.

Summary of modifications to Haslemere housing allocations

7.27 Following the consideration of representations received and further assessment of sites promoted for housing development as a result of the consultation on the Pre-Submission version of LPP2, it is considered that the proposed housing allocations for Haslemere in LPP2 should be modified as set out in Table 2 below. These main modifications should form an Addendum to the Pre-Submission version of LPP2 and be consulted on in accordance with Regulation 19 of the Local Planning Regulations. The Addendum is attached to this report as Annexe 1. It is also considered that other minor modifications to the Haslemere should be made that are not subject to consultation as set out in Annexe 2 to this report

Table 2 – Proposed Allocated Housing Sites to be consulted on in a Pre-Submission Addendum for Haslemere

Ref	Sites	Net Yield (no of dwellings)	Site area (ha)
DS01	Haslemere Key Site, Haslemere	30	2.5
DS02	Barons of Hindhead (Central Hindhead), London Road, Hindhead	38	1.6
DS03	Andrews of Hindhead, Portsmouth Road, Hindhead	35	0.55
DS04	Wey Hill Youth Campus, Haslemere	34	0.88
DS05	Haslemere Prep School, The Heights, Hill Road, Haslemere	24	1
DS 06	The Royal Junior School, Hindhead	90	9.6
DS07	Fairground Carpark, Wey Hill, Haslemere	20	0.6
DS08	The Old Grove, High Pitfold, Hindhead	40	2.4
DS09	National Trust Car Park, Branksome Place, Hindhead Road, Haslemere	13	0.4
DS10	Hatherleigh, Tower Road, Hindhead	5	0.49

DS11	34 Kings Road, Haslemere	5	0.3
	Total	334	

8.0 Housing sites in Witley - including Milford

8.1 The Pre-Submission version of LPP2 proposed that the following sites in Table 3 below are allocated for housing in the parish of Witley to meet the outstanding requirement of 203 dwellings as of 1st April 2020.

Table 3 – Allocated Housing Sites consulted on in the Pre-Submission version of LPP2 for Witley (including Milford) November 2020

Ref	Sites	Net Yield (no dwellings)	Site area (ha)
DS12	Highcroft, Milford	7	0.9
DS13	Wheeler Street Nurseries, Wheeler Lane, Witley	20	1.3
DS14	Land at Secretts, Hurst Farm, Milford	177	13
	Total	204	

8.2 The housing supply position for Witley/Milford has changed since the Pre-Submission version of LPP2 was consulted on. However, this change is very minor. Taking into account the number of new dwellings already committed in the settlement through completions since 2013 and outstanding planning permissions, there is a need to allocate sites to deliver at least 201 dwellings to meet the housing requirement of 480 dwellings as of 1st April 2021.

8.3 There were comments to the Pre-Submission version of LPP2 regarding Land at Milford Golf Course allocated as a strategic site in LPP1 (Policy SS6). These included comments that the site would not be able to deliver the number of homes that it was allocated for because of a restrictive covenant and therefore LPP2 should allocate alternative sites to compensate for this. This site is a strategic site allocation in LPP1. The land in question was also removed from the Green Belt in LPP1. It is considered to be outside the scope of LPP2 to re-visit this strategic allocation. When the Council conducts its review into whether LPP1 needs updating, it will take account of progress with the delivery of sites, particularly those strategic allocations in LPP1. This will clearly be a factor in deciding whether there will be a need to update LPP1. In addition, the site in question already has outline permission and an application for reserved matters is currently being considered. Developers proposing to deliver the housing on this site will be well aware of the covenant.

8.4 Other comments raised concerns about the impacts of development on highway infrastructure, on the level of housing needed generally in the settlement and on the release of Green Belt sites.

8.5 Generally, the comments regarding the detailed impact from housing development on each of the sites would be managed through the consideration of the adopted

strategic policies in LPP1 as well as those development management policies and the allocation policy itself proposed in LPP2. These comments do not affect the soundness of the LPP2, and it is considered that no changes to the Pre-Submission version of LPP2 are required.

- 8.6 The principle of removing land from the Green Belt to meet the housing required for Witley parish is clearly set out in LPP1. Policy RE2 of LPP1 states that the changes to the Green Belt will be made in LPP2 with the boundaries to be defined following consultation with local communities.
- 8.7 The proposed allocation at Secretts attracted several objections. There was some objection to the development of the site regarding impact on traffic, inadequate infrastructure to support it, the provision of measures to mitigate the impact on the SPA and the loss of an important local service in the form of the existing retail facilities. However, there was also support for the proposal in the site would give an opportunity to create a village centre for Milford.
- 8.8 Members will recall that the Secretts site is not within one of the broad locations that LPP1 identified by an asterisk as having the potential for removal from the Green Belt and was not, therefore, included as a proposed allocation in earlier draft versions of LPP2. As expected, a number of the objections to the proposed allocation of the Secretts site in the Pre-Submission version of LPP2 have therefore been focussed on it being inconsistent with the strategic policies set out in LPP1.
- 8.9 However, the legal advice the Council obtained at the time of preparing the Pre-Submission version of LPP2 was that there is nothing in law to prevent the Council from considering sites outside the 'asterisked' 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. At the time the Council prepared and published the Pre-Submission Plan, it was very well aware of the need to provide these reasons in support of the proposed allocation of the Secretts site. This included commissioning further and more detailed evidence of the potential impact on the Green Belt from a number of promoted sites around Milford and Witley, including the Secretts site.
- 8.10 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. The site also has a very strong measure of community support expressed by the Parish Council. The findings of the Green Belt assessment carried out in 2020 which looked at the impact that development would have on land at a more detailed scale than the Green Belt evidence gathered for preparing LPP1 also concluded that the site could be taken forward for further consideration along with five other sites. Its location is outside the AONB or AGLV, unlike some of the sites within the broad locations identified for removal from the Green Belt in LPP1. It is also located further away from the Wealden Heaths SPA than some of the sites in the 'asterisked' areas and has identified mitigation through the provision of Suitable Alternative Natural Greenspace (SANG). These important considerations provided clear and cogent reasons to proposing the site for allocation in LPP2.
- 8.11 In considering the Pre-Submission version of LPP2, it was recognised that the 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. However, it was considered 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. Officers have given careful consideration to the representations made in response to the Pre-Submission version of the Plan, including those challenging the validity of the supporting evidence. However, officers remain of the view that there are clear reasons to justify allocating the Secretts site, notwithstanding that it is not within one of the broad areas shown for possible removal from the Green Belt in LPP1.

- 8.12 The same issue regarding the impact of development in Haslemere on the Wealden Heaths SPA set out in paragraph 7.19 to 7.20 of this report applies to Witley. As it stands, there is not an avoidance strategy for the Wealden Heaths SPA, so sites do have to be considered on a case-by-case basis. Notwithstanding the absence of a formal avoidance strategy for the Wealden Heaths SPAs, Natural England has expressed the view that some form of mitigation and SANG is needed dependent on the number of dwellings developed on the site.
- 8.13 The only site in Witley/Milford over 50 dwellings is Secretts. Wheeler Street is allocated for 20 dwellings. One of the criteria for these proposed allocations in the pre-submission version of LPP2 requires a demonstration that development will not have a likely significant effect on protected habitats sites and this accords with the approach that Natural England took to the strategy set out in LPP1.
- 8.14 The Inspector for the examination into LPP1 stated in paragraph 68 of his report that *“Natural England has previously recommended that the Council undertake HRA on all major developments located within 5km of Wealden Heaths Phase II SPA. This is reflected in paragraph 16.28 of the Plan’s explanatory text and the approach is sound”*. However, as with the Haslemere allocations, it is considered that additional wording regarding consulting with Natural England on any avoidance and mitigation measures could be added to the allocations. Notwithstanding these provisions, the promoters of housing at Secretts have provided evidence that they can provide mitigation through SANG.
- 8.15 Historic England has objections to the proposed site allocations in LPP2 at Wheeler Street and Secretts because no assessment has been made on the impact of development on relevant conservation areas or listed buildings. Although it is considered that these are matters that a planning application for development will need to take into account under the proposed development management policies in the pre-submission version of LPP2, additional wording can be added to the allocation where relevant as proposed in the list of modifications in Annexe 2 to this report. The proposed allocation for Secretts already includes this as a criterion.

Summary of modifications to Witley/Milford housing allocations

- 8.16 The representations to the Pre-Submission version of LPP2 do not provide any new evidence that the proposed allocations are unsound. It is therefore considered that no modifications to LPP2 are needed to the proposed allocations in the settlement to make the plan sound or legally requirement so that the allocations and the yields set out in Table 3 remain. However, as a factual update, it is considered that the housing

supply position for Witley/Milford should be updated to 1st April 2021 and a minor correction to the site boundary for the proposed allocation at Secretts be made. However, officers consider that as these changes are not significant, they should not be subject to consultation before LPP2 is submitted for its examination. Therefore, they are listed as proposed minor changes to LPP2 as set out in Annexe 2 of this report.

9.0 Sites for Gypsy and traveller accommodation

9.1 As a result of the number of sites that have been granted planning permission since the accommodation needs for gypsy and travellers was undertaken in the Traveller Accommodation Assessment in 2018, the Pre-Submission version of LPP2 proposed to allocate a further 17 Gypsy and Traveller pitches and no new Travelling Showpeople plots to meet the assessed need.

9.2 Policy AHN4 of the LPP1 sets out the adopted strategic sequential approach for identifying sites to allocate for Gypsies, Travellers and Travelling Showpeople. Firstly, providing additional pitches/plots within available existing sites, then suitable extensions to available existing sites, then use of available land within settlements or on suitable rural brownfield land and then finally, on other land that that does not meet the three previous categories. In line with Policy AHN4, LPP2 proposes the allocations in Table 4 below that involve the re-use or intensification of existing sites.

Table 4 – Allocated Gypsy and Traveller accommodation sites consulted on in the Pre-Submission version of LPP2 for Waverley November 2020

Ref	Site Name	Net increase in pitches	Site area (ha)
DS15	Burnt Hill, Plaistow Road, Dunsfold	3	0.58
DS16	Land west of Knowle Lane, Cranleigh	1	0.46
DS17	Monkton Farm, Monkton Lane, Farnham	5	0.67
DS18	South of Kiln Hall, St George's Rd, Badshot Lea, Farnham	3	0.4
DS19	Land off Badshot Lea Road, Badshot Lea, Farnham	2	0.5
DS20	Old Stone Yard, Tongham Road, Runfold, Farnham	3	0.14
	Total	17	

9.3 There have been objections to the uneven distribution of the proposed allocations. There has also been concern that LPP2 does not deal with the evidence of need for traveling showpeople accommodation gathered back in 2010. Each of the specific allocations also attracted objection regarding the impact of the pitches on the character of the area and planning designations and inadequate infrastructure.

9.4 The distribution of the sites within the borough accords with Policy AHN4 of LPP1 that sets out the sequential approach for allocating sites for Gypsies, Travellers and Travelling Showpeople. In accordance with the adopted strategic approach, the sites/pitches that are proposed for allocation in LPP2 involve the re-use or intensification of existing sites.

- 9.5 Generally, the comments regarding the impact from development on each of the sites would be managed through the consideration of the adopted strategic policies in LPP1 as well as those development management policies. There was a representation that LPP2 ignores the evidence of needs of Travelling Showpeople and the Council should work with neighbouring authorities to ensure the need is met. However, the GTAA identifies a need for 2 additional Travelling Showpeople plots during the plan period which arises from a single site within the Borough. Officers have subsequently liaised directly with the household who has confirmed that there is no longer any need for additional travelling showpeople plots. These comments do not affect the soundness of LPP2 and it is considered that no changes to the Pre-Submission version of LPP2 are required.
- 9.6 Natural England have stated that mitigation is required for the allocations for Gypsy and Traveller accommodation where they lie within 5km of the Thames Basin Heaths SPA and therefore, should be referenced in LPP2. This change would be consistent with the approach to other housing in the Borough that is to be delivered. Historic England consider that appropriate sites need to be assessed for their impact on the historic environment and therefore it is proposed that this should also be referenced in the allocation. It is agreed that these minor modifications should be made and are set out in Annexe 2 to this report.
- 9.7 In July 2021 planning permission was granted for 7 additional gypsy and traveller pitches at Land North of Lydia Park. This means that together with other permissions granted since 2017 (including the adjustment to the site at Bridge View), and the 17 pitches proposed for allocation in LPP2, a total of 46 pitches will be provided to assist in meeting identified needs. The pre-submission version of LPP2 states that the combined total of permissions and proposed allocations would mean that the Council is meeting the needs of Gypsies and Travellers meeting the Government definition, as well as 66% of the unknown need (i.e., the needs of Gypsies and Travellers who were not able to be interviewed in the evidence gathering). This further planning permission at Land North of Lydia Park means that the Council would now be meeting all of the unknown need. Rather than proposing any reduction in the number of proposed allocations, officers consider that the allocations should remain as they are in the pre-submission Plan recognising that the further planning permission provides a degree of contingency in the event that sites do not come forward.

Summary of proposed modifications to Gypsy and Traveller allocations

- 9.8 As a result of the updated position on the supply of accommodation to meet gypsy and traveller's accommodation needs it is considered that no modifications to LPP2 are needed to the proposed Gypsy and Traveller accommodation allocations to make the plan sound or legally compliant. It is therefore considered that the allocations set out in Table 4 should remain. It is considered that a reference to the need to demonstrate that the impact of development on SPAs will be mitigated and that the impact on the historic environment will be assessed should be included in LPP2. However, officers consider that as these changes are not significant, they should not be subject to consultation before LPP2 is submitted for its examination. Therefore, they are listed as proposed minor changes to LPP2 as set out in Annexe 2 of this report.

10.0 Climate Change and biodiversity policies

- 10.1 Whilst there was a level of support for Policy DM1 and DM2, representations to the Pre-Submission version of LPP2 considered that the plan should be strengthened including setting out a more ambitious target for reducing carbon emissions and being more positively worded including reviewing LPP1. Comments also advocated setting out more strongly the requirements for biodiversity net gain, the need for a cross cutting approach to climate change including the recognition of the role of active travel and of the wider environment in mitigating and adapting to climate change. Other suggestions included the need to reflect the Future Homes Standard, adding reference to light pollution and recognising the opportunities in large housing developments.
- 10.2 The adopted strategic policies in LPP1 seek to deal with the impact of climate change. Policy CC1 of LPP1 sets out the strategic approach to mitigating and adapting to the impacts of climate change. Policy CC2 promotes sustainable patterns of development and greenhouse gas emissions will be reduced through sustainable design and construction in. Furthermore, 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.
- 10.3 It is not the role of LPP2 to review the strategic policies in LPP1 but sets out development management policies to support these strategic policies and the Council's climate change declaration in 2019. Policy DM1 sets out the criteria for assessing the environmental implications of development. This includes managing different types of pollution and contamination, minimising the emission of greenhouses gasses and maximising opportunities to deliver biodiversity net gain. Policy DM2 seeks to improve energy efficiency and reduce carbon emissions through design, a target for reducing carbon emissions for new dwellings higher than the target sets out in the Building Regulations and support for a greater reduction in carbon emissions or zero development. DM9 seeks to improve accessibility and promote sustainable transport modes and patterns including the adequate provision of electric vehicle charging points. These objectives are complemented by other development management policies such as DM4 (Quality Places). Higher targets set by the government for building standards that tackle the impact of climate change and improve biodiversity through legislation will not be undermined by LPP2.

Summary of proposed modifications to Climate Change and biodiversity policies

- 10.4 It is considered that no main modifications are needed to the climate change and biodiversity policies in the LPP2 because they adequately provide the detail to manage development in accordance with LPP1 and there is no evidence that has been submitted through the consultation on the Pre-Submission version of LPP2 that justifies a different requirement. However, minor modifications should be made to LPP2 to provide the clarity that the NPPF requires policies to have. Officers consider that as these changes are not significant, they should not be subject to consultation before LPP2 is submitted for its examination. Therefore, they are listed as proposed minor changes to LPP2 as set out in Annexe 2 of this report.

11.0 Other policies

- 11.1 There were objections to other Development Management policies particularly from residents and parish/town councils because they consider that the policies are not strong enough to control the impact of development. They consider that more specific policy criteria and requirements should be imposed to protect existing amenities. On the other hand, developers and landowners have suggested that in some cases the policy requirements are too restrictive, and the policy should be more positively prepared. Objections to specific designations proposed in LPP2, including the Farnham/Aldershot Strategic Gap and Local Green Spaces, were similar: respondents considered that the proposals either included or excluded land worthy of designation.
- 11.2 Whilst there was support from the infrastructure providers for Policy DM3 on Water Supply and Wastewater infrastructure for new development, residents and other organisations made comments including concern at future investment by Thames Water to deal with existing capacity issues across the Borough, that the policy should be strengthened. However, the policy in LPP2 has been prepared in liaison with the water and wastewater companies to ensure that this infrastructure is appropriately managed for new development
- 11.3 It is considered that LPP2 appropriately sets out the detailed planning policies and designations consistent with the adopted strategic policies in LPP1. They maintain a balance between ensuring protection and facilitating development that meets assessed needs. The approach to define the designations has been justified through the evidence that was gathered. As such, it is considered that no changes are needed to ensure that LPP2 is sound and legally compliant.

Summary of proposed modifications to other policies in LPP2

- 11.4 It is considered that only minor modifications are needed to other policies in LPP2 to provide clarity, consistency, factual updates and to make minor corrections. However, officers consider that as these changes are not significant, they should not be subject to consultation before LPP2 is submitted for its examination. Therefore, they are listed as proposed minor changes to LPP2 as set out in Annexe 2 of this report.

12.0 Comments on the Pre submission consultation from Statutory Bodies and adjoining Local Planning Authorities

- 12.1 In addition to the summary of issues and the Council's response to them set out in Annexe 3, Annexe 4 sets out a summary of the representations made by key consultees to the pre-submission version LPP2. This section of the report focuses on comments made by the statutory bodies and adjoining LPA which have not been mentioned in this report.
- 12.2 In addition to their comments on the impact on SPAs, Natural England also expect LPP2 to address the impacts of air quality particularly where this impacts on European sites and SSSIs and where the proposal is over 100 dwellings such as DS14 (Secretts). They agree that an in-combination effect is unlikely but would like to see further justification and the necessary process has been followed. As such the Council has commissioned some additional work in the Habitats Regulations Assessment to assess the impact of the development on the proposed allocated sites on the air quality of the SPAs and SSIs. The findings are that a direct adverse effect

due to NOx, ammonia or acid deposition is not expected to arise due to growth 'in combination' and certainly not due to LPP2. However, the technical report does make some recommendations with regard to some air quality improvement measures relating to electric vehicle charging, public transport, some of which could be delivered through the implementation of policies in LPP1.

- 12.3 Historic England have set out their support for many of the development management policies in LPP2 relating to heritage assets although they consider that additional or amended wording is required to provide clarification or correct errors. These are considered appropriate as minor modifications to LPP2.
- 12.4 The Environment Agency support Policy DM3 but have suggested the reiteration of Policy CC2 in LPP1 for ensuring that development meets the requirements of 110 litres of water per person daily.
- 12.5 Surrey County Council and neighbouring councils have emphasised the need for LPP2 to ensure that development meets needs and that LPP2 plans appropriately for supporting infrastructure. They request collaborative working and the need to consider their development plans, both in terms of growth but also protection. However, it is considered these representations do not require modification to LPP2.

Summary of modifications as a result of Comments on the Pre submission consultation from Statutory Bodies and adjoining Local Planning Authorities

- 12.6 Only minor modifications are needed to the Development Management Policies relating to heritage assets. However, officers consider that as these changes are not significant, they should not be subject to consultation before LPP2 is submitted for its examination. Therefore, they are listed as proposed changes to LPP2 as set out in Annexe 2 of this report.

13.0 Conclusion

- 13.1 Officers have considered all the representations to the pre-submission version of LPP2 as a result of its consultation between November 2020 and January 2021. In response to these representations, officers are recommending that modifications should be made to the Pre-submission LPP2 in the following way:

- a) Main modifications should be made to the site allocations in Haslemere to remove the proposed allocation at Red Court, Scotland Lane and to add a proposed allocation at The Royal School Hindhead. Furthermore, changes to the site areas and yields on sites previously proposed for allocation in the pre-submission version of LPP2 should be made. These main modifications, together with any consequential changes to the plan that are needed should be set out in an Addendum to the Pre-Submission version of LPP2 and a focussed public consultation should be carried out for 6 weeks under Regulation 19 of the Local Planning Regulations. Once the consultation has ended these main modifications should form part of LPP2 that will be submitted for examination.
- b) Other modifications to the Pre-submission version of the LPP2 to provide clarity, consistency, factual updates and to make minor corrections should be made but as they are not significant, they are not proposed to be the subject of public

consultation. However, they should be submitted to the Local Plan Inspector when examining the plan.

14.0 Relationship to the Corporate Strategy and Service Plan

14.1 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.

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

15.0 Implications of decision

15.1 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.

15.2 Risk management

The report seeks observations from the Overview and Scrutiny committee so that they can be considered by the Executive and Council when deciding the next stage of the preparing LPP2.

A sound Local Plan Part 2 needs to be in place to provide detailed development allocations and development management 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.

15.3 Legal

This Report has been checked and approved by Legal Services.

15.4 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.

15.5 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 considering the requirement to reduce carbon emissions and mitigate the impact of development on climate change.

16.0 Consultation and engagement

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

Annexes:

- Annexe 1 – Addendum to the Regulation 19 pre-Submission version of LPP2 proposed for consultation
- Annexe 2 – Proposed minor modifications to the Regulation 19 pre-submission version of LPP2 not subject to consultation
- Annexe 3 – Overview of the issues raised in the Regulation 19 consultation on the pre-submission version of LPP2 27th November 2020 to 29th January 2021 and the Council's response
- Annexe 4 – Overview of the issues raised by consultees to the Regulation 19 consultation on the pre-submission version of LPP2 27th November 2020 to 29th January 2021

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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Agreed and signed off by:
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