

Overview of Consultee's Response to LPP2 Regulation 19 Consultation

From the 27 November 2020 to 29 January 2021

The logo for Waverley Borough Council is located in the bottom right corner. It features a large blue circle with a smaller, semi-transparent teal circle overlapping its top-left edge. The word "Waverley" is written in a white, cursive script font across the middle of the blue circle. Below it, the words "BOROUGH COUNCIL" are written in a smaller, white, uppercase sans-serif font. A white curved line underlines the word "Waverley".

Waverley
BOROUGH COUNCIL

This document contains a summary of representations received from key groups of consultees during the Regulation 19 consultation, which took place from the 27 November 2020 until the 29 January 2021.

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SPECIFIC CONSULTATION BODIES

1.1 Environment Agency

Support

- Policy DM03: Water Supply and Wastewater Infrastructure
- References to the groundwater Source Protection Zones (SPZs) and the river/flood plain within Site Allocation DS01: Haslemere Key Site.

Recommend

- The reiteration of the LPP1 Policy CC2 requirement of 110 litres of usage per person per day within Policy DM03: Water Supply and Wastewater Infrastructure.

1.2 Highways England

General Support

- Reviewed draft plan and supporting consultation documents and have no detailed comments.

1.3 Historic England

Support

- Policies related to heritage assets, in particular:
 - Policy DM20: Development Affecting Listed Buildings, and/or their Settings,
 - Policy DM21: Conservation Areas,
 - Policy DM22: Heritage at Risk, and
 - Policy DM23: Non-designated Heritage Assets.

Suggest

- Amendments that elevate the profile of heritage assets in:
 - Policy DM01: Environmental Implications of Development, and
 - Policy DM14: Extensions, alterations, replacement buildings & limited infilling in the Green Belt.
- Other minor changes to the wording of:
 - Policy DM24: Historic Landscapes and Gardens
 - Policy DM25: Archaeology

- Concern/Objection

- The lack of justification on heritage grounds on several proposed site allocations in: -
 - Haslemere:

- DS01 Haslemere Key Site, DS04 Wey Hill Youth Campus, DS06 Red Court, DS07 Fairground, and DS09 National Trust Car Park
- Witley and Milford:
 - DS13 Wheeler Street Nursery and DS14 Secretts
- Gypsy and Traveller Sites:
 - Some sites should also be assessed for impacts on the historic environment.

1.4 Natural England

Support

- The consideration of climate change in LPP2.
- The position of Surrey Hills AONB Board on DS06 Red Court.
- The HRA but need further justification regarding potential likely significant effects of air pollution upon the integrity of Thames Basin Heaths (TBH) and other Special Protection Areas (SPAs) - in particular, the in-combination assessment.

Recommend

- Mitigation required on the following sites; therefore, policy should reference mitigation within the following site allocations: -
 - Gypsy and Traveller Sites Allocations:
 - DS17 Monkton Farm,
 - DS18 South of Kiln Hall,
 - DS19 Land of Badshot Lea Road, and
 - DS20 Old Stone Yard.
- Stronger mitigation wording suggested for the following site allocations: -
 - Housing Sites Allocations:
 - DS01 Haslemere Key Site,
 - DS04 Wey Hill Youth Campus,
 - DS05 Prep School,
 - DS06 Red Court,
 - DS07 Fairground, and
 - DS14 Secretts (including SANG requirement).
- LPP2 addresses the impacts of air quality, particularly where it impacts on European sites and SSSIs, and where proposals are over 100 dwellings, e.g., DS14: Secretts.
- The use of Defra's Biodiversity Metric v2.0 for measuring and recording biodiversity net gains.
- Seeking opportunities for wider environmental net gain and opportunities in Natural Capital.

Concern/Objection

- Raised concern about the impact of Site Allocations: -

- DS06: Red Court on the AONB,
- DS15: Burnt Hill on the SSSI,
- DS04 Wey Hill Youth Campus on Ancient Woodland,
- DS09 National Trust Carpark on Ancient Woodland, and
- DS15 Burnt Hill on Ancient Woodland.

1.5 Surrey County Council

General Support

- In terms of site allocations, expect transport impacts and any associated mitigation required because of these impacts, to be identified as part of the Transport Assessment at the planning application stage.

Suggest

- A factual update on what is assessed in terms of HGVs transport impacts
- Suggest more emphasis on: -
 - Active modes of travel and special access needs in DM4, and
 - Affordable housing to meet the specific requirements of the growing population of older people in Surrey.
- Heritage related suggestions: -
 - A list or register of local features vulnerable to risk to strengthen DM22 in terms of measuring its implementation effectiveness
 - Comments on DM24 in relation to planning weight and registered parks
 - Adding extra wording to strengthen DM25 in respect of when archaeological field evaluations are required.

1.6 Guildford Borough Council

General Support

- Progress in meeting the Objectively Assessed Housing Need.
- The Plan's site allocations, providing their necessary infrastructure is also planned for.

Recommend

- Further assessment of growth in planned in Guildford should be accounted for.

1.7 Southern Gas Network

Support

- Early interaction with developers to locate renewable energy facilities near gas network.

Concern/Objection

- Servicing gas to the Dunsfold Park development, suggesting service infrastructure reinforcements will be required.

1.8 Southern Water

Support

- Policy DM03: Water Supply and Wastewater Infrastructure.

1.9 Thames Water

- Support
 - Policy DM03: Water Supply and Wastewater Infrastructure and suggests some improvements.
- Concern/Objection
 - Specific allocations and the sewerage/ wastewater network and wastewater treatment infrastructure.

1.10 Others

The following Statutory and Duty to Cooperate bodies were notified of the LPP2 Regulation 19 consultation but did not provide any representations to the Council.

- Civil Aviation Authority
- Enterprise M3 LEP
- Homes England
- Office of Rail Regulation
- The Mayor of London
- Transport for London
- National Grid
- North East Hampshire and Farnham Clinical Commissioning Group.
- Waverley and Guildford Clinical Commissioning Group (formerly Primary Care Trust)
- Police and Crime Commissioner
- Surrey Police
- Network Rail Infrastructure Limited
- Secretary of State for Transport
- Mole Valley District Council Hart District Council, East Hants District Council and West Sussex County Council.

TOWN AND PARISH COUNCILS

2.1 Alfold Parish Council

Support

- Protection of heritage and creation of quality places that consider village distinctiveness and amenity.

Suggest

- Several policies need strengthening and greater clarity.
- A new policy is required for restricting further development and expansion of the Gypsy and Traveller site at Stovolds Hill.
- Greater connection between LPP2 and Neighbourhood Plans to ensure specific local planning issues are considered at settlement level.

2.2 Bramley Parish Council

Suggest

- Gypsy and Traveller site allocations are more evenly distributed across the Borough, rather than being concentrated in the Lydia Park area.
- Several policies changes in relation to advertisements/ signage, and request amendments to reduce wildlife impact corridor in Policy DM33: Downs Link - Guildford to Cranleigh Corridor.

Concern/Objection

- LPP1 is inconsistent with LPP2, as the adopted LPP1 has been breached by Dunsfold Park.
- Highway network contradicting Policy DM09: Accessibility and Transport.

2.3 Cranleigh Parish Council

Suggest

- Improvements to development management policies to provide more certainty
- Setting a cap (dwellings, i.e., pitches) for Site Allocation DS16: Land west of Knowle Lane, Cranleigh

2.4 Dockenfield Parish Council

Support

- Proposed settlement boundary, with the exception of Goose Cottage and Fairfield House.

Suggest

- Several policies need strengthening and to provide clarity.
- The 40% restriction imposed by Policy DM14: Extensions, alterations, replacement buildings & limited infilling in the Green Belt, should apply to all countryside not just Green Belt.

Concern/Objection

- The exclusion of the submitted Local Green Space sites in Dockenfield.

2.5 Dunsfold Parish CouncilSuggest

- Policies are too 'urban-centric' and there is a need to differentiate between urban and rural settlements at the policy level.
- Several policies need to be strengthened to take account the unique issues that affect Dunsfold.

Concern/Objection

- Site Allocation DS15: Burnt Hill, Plaistow Road, Dunsfold on the basis that it is subject to enforcement action

2.6 Elstead Parish CouncilSupport

- The recognition the plan has for the Elstead Neighbourhood Plan site allocations but suggest the policy on enforcement should consider Neighbourhood Plan processes.

Suggest

- Plan should consider including housing in the settlement boundary to resolve issues of appropriateness of development.

Concern/Objection

- The existing junction at the A3 to accommodate additional traffic caused by the number of planned homes in Witley and Milford.
- Settlement calescence and the need to control development in rural areas to avoid this.

Notified the Council that

- Thames Water have provided advice on their Neighbourhood Plan on discharging surface water into main sewers from new dwellings.

2.7 Farnham Town CouncilSuggest

- More active policy response to climate change and biodiversity.
- Design policies should be more responsive to character areas.
- Constraints outside built up area need to be referenced and mapped.

- Recreation grounds in Farnham should be included as other recreation grounds elsewhere in the Borough have been included.

Concern/Objection

- Neighbourhood Plan alignment issues and how Farnham is represented in LPP2.
- That Gypsy and Traveller site allocations, including extensions to existing sites, within the Farnham-Aldershot Strategic Gap.

2.8 Frensham Parish Council

Suggest

- Several policies need strengthening and to provide more clarity.
- The application of Policy DM13: Development within Settlement Boundaries, criteria should differentiate between larger and smaller settlements.
- Policy DM14: Extensions, alterations, replacement buildings & limited infilling in the Green Belt, should apply to all development in the countryside and not just in the Green Belt.
- Policy DM15: Development in Rural Areas should take into account Neighbourhood Plans.

Concern/Objection

- The practice of pre-application tree felling and the need for this activity to be controlled.

2.9 Hambledon Parish Council

Support

- The settlement of Hambledon not being within a settlement boundary.
- Several policies and emphasised the need for rigorous and consistent application to make them effective.
- Protection of the Downs Link and advocates the use as a future light railway route.

Concern/Objection

- Housing requirement in LPP1 not justified and supported by local infrastructure provision.
- Concern at the amount of housing development in Witley and Milford.

2.10 Haslemere Town Council

Concern/Objection

- DS06 Red Court site allocation due to its unsustainable location and contrary to the Haslemere Neighbourhood Plan.
- The water supply network's ability to accommodate new planned growth

- Potential water service disruption and impacts from new development on the community.

Require more information

- About the Haslemere Key Site development to come to a view as their current position is uncertain at this stage.

2.11 Tilford Parish Council

Suggest

- Further guidelines to control light pollution
- That the Enforcement policy should consider Neighbourhood Plans.

2.12 Witley Parish Council

Support

- The housing allocation at Secretts and would like to be involved in the site's design review processes.

Suggest

- Several policies need strengthening and to provide more clarity.
- Local Centre boundary should be extended to include Post office, Tesco, Co-Op and Secretts shop.

2.13 Wonersh Parish Council

Support

- The Council's commitments to:
 - Sustainable transport but has some concerns about HGVs.
 - Continued tree protection.

Concern/Objection

- That Policy BE6 of the 2002 Local Plan, related to protecting 'Lower Density Residential Areas' from infill, appears not to be retained.

COMMUNITY INTERESTS

3.1 Residents Associations

3.1.1 Badshot Lea Community Association

Support

- Policy DM11 Trees, Woodland, Hedgerows.

Suggest

- Seek high quality design standards that: make efficient use of land with sensible densities and regard made to the cumulative effect of development at the edge of settlements.

Concern/Objection

- Traveller Site Allocation DS19: Land off Badshot Lea Road, in relation to the visual impact on the Farnham/ Aldershot Strategic Gap.

3.1.2 Frith Hill Area Residents Association

Suggest

- Transport and infrastructure measures to further mitigate highways impact of the Dunsfold Park development.

Concern/Objection

- The potential impact of the Borough's housing numbers on Godalming.
- Vehicular pollution and highway safety at the following locations:
 - Charterhouse Road Roundabout, and
 - Huxley Close/Frith Hill Road junction (arising from car parking)

3.1.3 Haslemere South Residents Association

Concern/Objection

- LPP2's compliance with LPP1 Policy RE3 Landscape Character, and relevant paras in the National Planning Policy Framework (NPPF) about conserving and enhancing biodiversity and respecting the Areas of Outstanding Natural Beauty (AONB) and Areas of Great Landscape Value (AGLV), relative to their status as designations.
- Some environmental objectives contained within the Sustainability Appraisal and the assessment of DS06: Red Court, Scotland Lane, in terms of the site's impacts compared to other viable alternatives.
- To the settlement boundary change in proposed in South Haslemere.

3.1.4 North Farnham Voice

Suggest

- Changes to the wording of Policy DM09: Accessibility and Transport.
- Biodiversity and climate change cannot just be addressed by design, structure, and landscaping.
- Factual change sought to address the composition excessive emissions in Air Quality Management Areas.
- Changes to Policy DM04: Quality Places through Design and Policy DM06: Public Realm.
- Greater emphasis is needed for access to local green space and other local amenities in order to achieve health outcomes.
- Emphasis on implementation to ensure development outside of settlement boundaries is appropriately assessed.

Concern/Objection

- Policy alignment between LPP2 and Neighbourhood Plan areas, particularly with the FNP.
- The Plan does not seek to actively reduce carbon emissions and improve the Borough's biodiversity.
- Including only the A31 Farnham By-Pass Improvements as a policy and not including other major highway improvements considered as part of the Farnham Infrastructure Programme.
- Local Landscape Areas referring to the Farnham/Aldershot Strategic Gap and Areas of Strategic Visual Importance (ASVIs).
- Traveller Site Allocation DS19: Land off Badshot Lea Road, in relation to the visual impact on the Farnham/Aldershot Strategic Gap.
- About the exclusion of Local Green Space sites submitted to the Council by the Farnham Town Council.

3.1.5 South Farnham Residents Association

Support

- Policy DM01: Environmental Implications of Development, but suggest minor wording changes to better reflect the more proactive intentions of the NPPF

Suggest

- Changes to Policy DM04: Quality Places through Design, in relation to:
 - Cumulative effects of development,
 - Farnham Design Statement, and
 - A more proactive emphasis on natural landscaping to enhance trees and greenery.

Concern/Objection

- Policy alignment between LPP2 and Neighbourhood Plan areas, particularly with the FNP.
- Exclusion of Local Green Space sites submitted by Farnham Town Council.

3.1.6 The Crooksbury Road Residents Association

Suggest

- Using emergency TPOs to preserve and protect any trees, woodland, and hedgerows at risk from future or potential future development.
- Provision of additional Traveller pitches should be distributed more evenly around Waverley.

Concern/Objection

- The protection of Public Rights of Way

3.2 Haslemere Community Land Trust

- Concern/Objection

- The current under-delivery of truly affordable housing in Haslemere so town sites must provide affordable housing in perpetuity.

3.3 Haslemere Vision

Support

- Adherence to the Government's Technical Housing Standards - the Nationally Described Space Standards (NDSS) and gardens for flats.
- Policy DM35: Reuse of and Alterations to Large Buildings, as it will assist in contributing to the windfall component of housing supply.
- Policy DM06: Public Realm, as it will have a positive impact on community loneliness.
- Policy DM17: Haslemere Hillside.
- Policy DM27: Development within Town Centres.
- Policy DM36: Self-Build and Custom Housebuilding
 - Despite some concern it may compromise density in town sites.
- Site Allocation DS07: Fairground Car Park, Wey Hill.
- The retention of Holy Cross Hospital ASVI, as shown on Map 33: Haslemere ASVIs.

Suggest

- The site behind Boots (referring to area in Policy DM28: Access and Servicing) could be used for low density housing.
- Increase the building density on Site Allocation DS01: Haslemere Key Site.

- Affordable housing should be provided as part of Site Allocation DS04: Land at Wey Hill Youth Campus.
- Adding a minimum requirement, suggested at 20%, for Biodiversity Net Gain within Policy DM01: Environmental Implications of Development.
- The re-siting/replacement of the car park on Site Allocation DS09: National Trust Car Park, and no further hard landscaping on Greenfield land.
- Amendments to Map 17: Haslemere Settlement Boundary, for the removal of two sites on the northern edge of Beacon Hill.
- Additional areas should be designated as part of Policy DM19: Local Green Space.

Concern/Objection

- That lower densities in urban areas may be an unintended consequence of Policy DM36: Self-Build and Custom Housebuilding.
- Site Allocation DS06: Red Court, on the grounds that it is:
 - Within protected landscape of AONB and AGLV.
 - Outside the settlement boundary, contrary to the draft/proposed Haslemere Neighbourhood Plan (HNP).
- To the removal of six areas of garden land on properties along the Weydon Road, as shown on Map 33: Haslemere ASVIs.

3.4 The Haslemere Society

Support

- High density as part of Site Allocation DS07: Fairground Car Park.
- (~SIC Acknowledges) The Update to Haslemere Town centre boundary.
- Policy DM04: Quality Places through Design.
- Policy DM30: Telecommunications.
- Policy DM34: Access to the Countryside.
- Policy DM11: Trees, Woodland, Hedgerows and Landscaping.

Suggest

- An alternative site should be put forward to replace Site Allocation DS06: Red Court.
- Retaining the 140 parking spaces as part of the development of Site Allocation DS07: Fairground Car Park.
- Adding a minimum requirement, suggested at 10%, for Biodiversity Net Gain within Policy DM01: Environmental Implications of Development.
- Policy DM12: Planning Enforcement is too weak.
- Policy DM27: Development within Town Centres should refer to importance of retaining and expanding parking in Haslemere.
- Rewording of the policy and or supporting text of:
 - Policy DM09: Accessibility and Transport,
 - Policy DM15: Development in Rural Areas,

- Policy DM31: Filming, and
 - Paragraph: 2.79 in Trees and Landscape.
- That the Council should be responsible for ensuring that the £55.7M Thames Water upgrade happens in Haslemere.
- Concern/Objection
 - The discrepancy of the Haslemere windfall figure, as Haslemere Vision have calculated this to be 226 dwellings, not 153 dwellings.
 - The developer currently actively engaged with Site Allocation DS06: Red Court, is planning a second phase of development that would include an additional 130 dwellings.
 - An existing planning application for 1 dwelling on Site Allocation DS11: 34 Kings Road, and that this should not be granted planning permission.
 - The local highway network being sufficient to handle the strain from new planned residential development.
 - Site Allocation DS06: Red Court, (objects) on the grounds that it is:
 - Within protected landscape of AONB and AGLV, and
 - Outside the settlement boundary, as set out in the draft/proposed Haslemere Neighbourhood Plan (HNP).
 - To the removal of six areas of garden land on properties along the Weydon Road, as shown on Map 33: Haslemere ASVIs.

3.5 Transition Town Farnham

Support

- Policy DM02: Energy Efficiency.

Suggest

- That Policy DM01: Environmental Implications of Development, is too weak given the Council's climate emergency declaration.
- More clarity and emphasis are needed regarding references to active travel modes in:
 - Policy DM04: Quality Places,
 - Should refer to active travel permeability and access to/from the site
 - Policy DM06: Public Realm,
 - Policy DM09: Accessibility and Transport, and
 - Policy DM10: A31 Farnham By-Pass Improvements
- The same protection should be given to the Wey and Arun Canal as it is in Policy DM33: Downs Link - Guildford to Cranleigh Corridor but suggest it should go further by setting targets for improvement of PROWs on these routes and amending the route maps to show omitted footpaths.
- Concern/Objection
 - The approach and assessment criteria used in the Sustainability Appraisal

3.6 The Farnham Society

Suggest

- Minor change sought to address the phrasing of excessive emissions and the concentration of Nitrogen Dioxide and particulate matters in relation to Air Quality Management Areas.
- Additional detail on Policy DM01: Environmental Implications of Development, in respect of air quality.
- Amendments to the following policies and supporting text:
 - Trees and Landscape,
 - Climate Change,
 - Energy Efficiency,
 - Water Supply and Wastewater Infrastructure,
 - Design,
 - Accessibility and Transport,
 - Development within Settlement Boundaries,
 - Local Landscape Areas,
 - Heritage Assets,
 - Employment Sites,
 - Town and Local Centres,
 - Access to the Countryside, and
 - Gypsy and Traveller Site Allocation DS18: South of Kiln Hall.

Concern/Objection

- Policy alignment between LPP2 and Neighbourhood Plan areas, particularly with the FNP.

NATURE AND THE ENVIRONMENT INTERESTS

4.1 CPRE, Surrey

Suggest

- Adding a minimum requirement, suggested at 20%, for Biodiversity Net Gain within Policy DM01: Environmental Implications of Development.
 - Adding references to tranquillity, and to dark skies.
 - Policy DM11: Trees, Woodland, Hedgerows and Landscaping, should try to control the practice of pre-application felling of trees more proactively.
 - Policy DM15: Development in Rural Areas, should be revised to follow Local Plan 2002 saved Policy RD1: Rural Settlements, more closely.
 - Advocate for the sharing of masts as part of Policy DM30: Telecommunications, to minimise visual impacts.
 - Amending Map 15: Godalming Settlement Boundary, to put 'Land at Binscombe' back into the Green Belt and AGLV.
 - Differentiation of medium and smaller villages in Policy DM13: Development within Settlement Boundaries, and on whether a village has met its housing allocation in a neighbourhood plan as part of Policy DM15: Development in Rural Areas.
 - Further information is required on whether Site Allocation DS09: National Trust Car Park, Haslemere, is appropriate or not, as it abuts important habitats and wildlife corridors in the area.
- Concern/Objection
 - The impact of light from new development on intrinsically dark landscapes (Dark Skies) and nature conservation (tranquillity).
 - Not adequately dealing with issues around harm to visual character and distinctiveness of a locality, and what is considered 'appropriate development' in terms of scale, height, form and appearance.
 - Policy DM11: Trees, Woodland, Hedgerows and Landscaping should say regard should be had to any pre-application felling of trees.
 - Policy DM15: Development in Rural Areas, does not reflect explanatory text paras 3.33 and 3.34.
 - It should be revised to follow saved Policy RD1 more closely.
 - Site Allocation DS06: Red Court, (object) on the grounds that it is:
 - Within protected landscape of AONB and AGLV,
 - Outside the settlement boundary, contrary to the Haslemere Neighbourhood Plan, and
 - Goes against the Climate Change Emergency the Council declared to protect the environment.

4.2 RSPB

Support

- (SIC - Supports the general intention of...) Policy DM01: Environmental Implications of Development.

Suggest

- All new residential development is likely to influence the SPA and should provide or contribute to avoidance measures.
- Gypsy and Traveller site allocations in Farnham (DS17,18,19) should reference requirement for mitigation in policy wording, given they are within 5km of the TBH SPA.
- Adding a minimum requirement, suggested at 20%, for Biodiversity Net Gain within Policy DM01: Environmental Implications of Development.

Concern/Objection

- The Plan will not achieve the key objectives Policy DM01: Environmental Implications of Development, due to:
 - The allocation of housing within 400m of WHSPA I & II, and the
 - Lack of appropriate mitigation for housing development in the wider Wealden Heaths SPA zone of influence
- Site Allocation DS02: Central Hindhead, as it is within 14m of the SPA and that evidence has not been provided that this is mitigable.
- Several Gypsy and Traveller site allocations in Farnham (DS17,18,19) are within 5km of the TBH SPA.

4.3 Surrey Gardens Trust

Suggest

- The inclusion of a specific policy relating to Registered Parks and Gardens
- Reference to non-registered Parks and Gardens in Policy DM23.
- Detail is added to 'Non-Designated Heritage Assets' and 'Registered Parks and Gardens' as described in the Glossary.

Concern/Objection

- That paraphrasing parts of Chapter 16 in the NPPF, may actually weaken the heritage and conservation policies.

4.4 Surrey Hills AONB Board

General Support

- For the Plan and its site allocations

Suggest

- In relation to Site Allocation DS06: Red Court, Haslemere
 - An alternative site should be put forward to replace this site

- Making DS06 a ‘reserve housing site’, effectively on ‘hold’ for a period, until an appropriate alternative comes forward to replace it.

Concern/Objection

- Site Allocation DS06: Red Court, Haslemere, on the basis that more sustainable alternatives should be considered instead of compromising AONB land

4.5 Surrey Wildlife Trust

Suggest

- More emphasis on urban brownfield intensification over greenfield sites.
- Several areas where policies could be strengthened and/ or revised.
- Rewording to improve clarity of:
 - Policy DM01: Environmental Implications and of Development, and
 - Policy DM11: Trees, Woodland, Hedgerows and Landscaping.

Concern/Objection

- Policy alignment between LPP2 and Neighbourhood Plans.

4.6 The Woodland Trust

Support

- Policy DM11: Trees, Woodland, Hedgerows and Landscaping.
- Policy DM27: Development within Town Centres.

Suggest

- Setting a target for tree canopy cover on new sites in town centres.
- Revisions aimed at strengthening:
 - Policy DM01: Environmental Implications of Development, and
 - Policy DM04: Quality Places through Design

4.7 Waverley Friends of the Earth

Support

- Policy DM33: Downs Link - Guildford to Cranleigh Corridor.

Suggest

- More radical action is taken in order to achieve a greater contribution to the Council’s zero carbon targets.
- Plan should refer to the Climate Emergency Target and Carbon Neutrality Action Plan.
- Revisions aimed at strengthening Policy DM02: Energy Efficiency with the inclusion of more aggressive energy standards.
- Rewording of Policy DM01: Environmental Implications of Development, to make more positive and easier to understand.

Concern/Objection

- The Plan does not go far enough in terms of climate change.

OTHER CONSULTEES

5.1 Educational (Schools and Organisations)

5.1.1 University of the Creative Arts (UCA) (Farnham Campus)

Support

- The Plan's recognition that university contributes to economic development in Farnham.

Suggest

- That a site-specific policy for UCA's Campus would be useful.

5.2 Gatwick Airport

Suggest

- A new policy is required in response to the pending amendment to the Gatwick Airport Aerodrome Safeguarding Zone.

5.3 Home Builders Federation

Suggest

- Plan must allocate additional housing.
- LPP2 does not meet LPP1 housing requirement.
- Inflexible with no buffer, and therefore does not accord with the NPPF.
- 5 YHLS shows shortfall as does AMR compounded by non-delivery of Dunsfold Park.
- More flexibility is required to allow viability of schemes in relation to Policy DM05: Safeguarding Amenity and the DCLG's Technical Housing Standards – Nationally Described Space Standard.
- Emphasis on robust evidence underpinning Policy DM36: Self-Build and Custom Housebuilding and maintaining the Register, as demand appears low in Waverley and AMR indicates an over delivery.
- Council should use their own land to deliver this policy.

5.4 Developer Interests

Many responses to the consultation came from landowners and agents promoting various land and property for development uses, mainly residential development. Representations were submitted to the plan by the following commercial development interests:

Development interest came from the following commercial enterprises:

- Adeo Development
- Antler Homes
- Ashill Land Ltd
- Bellway Homes
- Bewley Homes
- Birley Courtyard Management Ltd
- Castle Properties
- Cove Construction
- Crownhill Estates
- Cranleigh School
- Devine Homes
- ELM Group
- ELS Developments
- Enabling Land Ltd
- Falcon Developments
- Grant Martin Homes
- King Edward School
- ME Care Ltd
- Monkhill Ltd
- Mousehill Ltd
- Ptarmigan Ltd (Secretts)
- Reside Developments
- Rowan Properties
- Stonegate Homes
- Thakenham Homes
- Turners Park Group
- Twist Heights Ltd
- Vanderbilt Homes
- Voyage Healthcare
- Victoria Asset Management
- W.E. Black Ltd
- Wates Development
- William Lacy Group

Commercial development interests argued that there was a need to identify additional housing sites to boost supply, citing inconsistencies between LPP1 and LPP2 and their separate adoption timelines were causing a significant slowing down of housing delivery. They claimed that matters concerning housing need and delivery ought to be addressed more urgently.

5.5 Waverley Conservative Councillor Group

Suggest

- Coordinated development and deliverability timelines and comments on accessways.
- Improvements to energy efficient buildings, high speed broadband provision, electric vehicle fast charging and water recovery.
- Some changes to infrastructure requirements e.g., A31 Farnham Bypass.

Concern/Objection

- The impact new development will have on the landscape, particularly the Surrey Hills AONB, Green Belt and Dark Skies Areas.
- Policy alignment between LPP2 and Neighbourhood Plan areas, particularly with FNP.

5.6 Individual persons Interests

Responses to the consultation also came from individuals interested in or concerned about future development in Waverley. Individuals submitted comments on a wide range of policies and site allocations. Many responses highlighted the importance of climate change, environmental sustainability, and livable local communities.

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The logo for Waverley Borough Council features a large blue circle on the right side of the page. A smaller, light teal circle overlaps the top-left edge of the blue circle. The word "Waverley" is written in a white, cursive script font across the middle of the blue circle. Below it, the words "BOROUGH COUNCIL" are written in a white, uppercase, sans-serif font. A white curved line underlines the word "Waverley".

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