

Annex 3 - Local Plan Part 1 Review: Review of Local Plan Part 1 Policies

LPP1 Policy	Does the policy comply with the NPPF/NPPG?	Comments (e.g., compliance with other legislation, AMR monitoring conclusions, status of delivery, impact of Neighbourhood Plans etc.)	Initial indication of a need to review? (Y/N)	Potential evidence required to facilitate review
<i>Chapter 5: Spatial Strategy</i>				
SP1: Presumption in Favour of Sustainable Development	General Strategic Policy accords with national policy. Unlikely to need changing but will need to consider detailed wording of NPPF for any nuances		Unlikely	
SP2: Spatial Strategy	<p>Strategic policy setting out where development should be located within the Borough. The priority is to protect national designations, focus development at the four major settlements, moderate and limited development in the lower order settlements, maximise opportunities at Dunsfold Aerodrome, develop strategic sites and provide necessary infrastructure. NPPF does not set out an approach to spatial distribution of development. It takes a thematic approach including making an effective use of land and prioritising brownfield development to meet needs whilst supporting local communities, protecting Green Belt, conserving and enhancing the natural environment including respecting the hierarchy of designations.</p> <p>As such the policy is broadly in line with the NPPF but the detailed wording will probably need to be changed to accord with it.</p> <p>The policy is very important in identifying the level of growth in different settlements, based partly on where they sit in the Settlement Hierarchy. However, that document needs to be refreshed as part of the updating of the Plan.</p>	<p>However spatial strategy is also a reflection of identifying how much development is needed and then establishing if it can be accommodated within the NPPF. If not, spatial strategy will need to be adapted.</p> <p>Notwithstanding any possible change in the level of need, the Council will need to consider the delivery of the housing planned for in LPP1.</p>	Yes	See below

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<i>Chapter 6 The Amount and Location of Housing</i>				
ALH1: The Amount and Location of Housing	<p>Policy ALH1 sets out the annual minimum housing requirement for the borough of at least 590 dwellings per annum which was assessed as needed at the time LPP1 was examined. This figure does not reflect the annual housing requirement based on the calculation of need using the standard methodology which is higher (currently 744 dwellings per annum) than the figure in LPP1.</p> <p>Paragraph 66 of the NPPF requires strategic policies to include a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development. Policy ALH1 of LPP1 apportions the housing requirement to different settlements in the Borough. However, the distribution is based on the minimum housing requirement of 590 dwellings per annum and this may need to be reviewed in light of the higher annual housing requirement</p> <p>Paragraph 71 of the NPPF allows local planning authorities to make an allowance for windfall sites as part of the anticipated supply. The Five-Year Supply Position Statement for 2022 demonstrates windfalls still make a positive contribution to the housing supply. Policy ALH1 is still considered to be in compliance with the NPPF in this regard.</p>	<p>May also be impacted by considering 'deliverability' of existing allocated sites. Five-year Housing Land Supply may also have implications.</p> <p>Under the Duty to Cooperate the Council will also need to consider if there is any unmet need from neighbouring local authorities which Waverley will need to accommodate.</p> <p>The delivery of Dunsfold Aerodrome and Land opposite Milford Golf Club has been delayed from that set out in LPP1 Housing Trajectory until later in the plan period.</p> <p>Based on the standard methodology the Council will be unable to demonstrate a five-year supply of sites in the later years of new plan period unless additional housing sites are planned for over</p>	Based on evidence gathered to date, a review of this policy is recommended.	<p>The conclusions made regarding the need to review this Policy are likely to have wider reaching implications on other policies within the Plan. If it is determined that ALH1 requires review that further work will not only be required on this Policy alone.</p> <p>Potential Evidence:</p> <ul style="list-style-type: none"> • Unmet need in neighbouring authorities • Water Cycle Study • Employment Needs Assessments • Settlement Hierarchy

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		<p>and above those allocated in LPP1, LPP2 and neighbourhood plans.</p> <p>Consideration needs to be given to the level of affordable housing delivery and First Homes delivery over the plan period. Initial evidence suggests the delivery of affordable homes during the plan period has been less than the need identified in the SHMA. No First Homes have been delivered. Consideration will also need to be given to the interrelation between housing delivery and economic/employment growth.</p>		<ul style="list-style-type: none"> • Land Availability Assessment • Green Belt Review • Landscape assessments • Work regarding European Site mitigation • Viability
Chapter 7 Sustainable Transport				
ST1: Sustainable Transport	This is a fairly generic policy. It appears to be currently compliant with NPPF/NPPG but needs to be considered against other agendas and objectives that land use/development contributes to (e.g. climate change)	Policy needs to be considered in relation to health and well-being, and climate change agendas. Also need to consider implications of the latest Surrey Local Transport Plan	Unsure – may be dependent on changes to ALH1 and LTP4	Discussions with SCC regarding LTP

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		(LTP4). It could also require changes dependent on ALH1		
<i>Chapter 8 Infrastructure and Community Services (MN)</i>				
ICS1: Infrastructure and Community Facilities	This is a fairly generic policy. Currently compliant with NPPF/NPPG, however, it is noted that this is one of the areas in which changes that was proposed in the White Paper.	<p>Infrastructure provision must be aligned with growth; therefore, if changes are made to other aspects of LPP1 there is a need to revisit this Policy. However, currently no need to Review.</p> <p>Part of this Policy focuses on the priority for the provision of SANG for the TBH SPA – There is a need to monitor current SANG availability that it supports provision during the Plan period. Equally there may be a need to consider whether the current approach to WH SPA will change. Some of the NP allocations will require SANG so there could be issues with these being delivered during the Plan period.</p>	No. However, this may be dependent on changes to ALH1 and discussions with NE regarding WH SPA	Review current SANG availability; continued discussions with NE in regard to whether approach to WH SPA requires revision including a strategic approach similar to TBH.

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<i>Chapter 9 Affordable Housing and Other Housing Needs</i>				
AHN1: Affordable Housing on Development Sites	<p>Para 63 of the NPPF states that planning policies should specify the type of affordable housing required. Policy AHN1 does not specify in detail the type of affordable housing required but refers to the “mix of dwelling types, sizes and tenure split should reflect the type of housing identified as being required in the most up - to-date evidence of housing needs and the SHMA having regard to the form and type of development appropriate for the site”.</p> <p>Para 64 of the NPPF requires affordable housing provision on schemes of 10+ dwellings in non- designated rural areas. Policy AHN1 sets a threshold of 11 + dwellings in non-designated rural areas. The policy is not considered to comply with the most up to date version of the NPPF with regard to the thresholds for affordable housing provision.</p> <p>Paragraph 65 of the NPPF requires planning policies to expect at least 10% of the total number of homes on major sites to be for affordable home ownership unless specific exceptions apply. Policy AHN1 does refer to the requirements of paragraph 65 of the NPPF.</p> <p>The policy doesn't refer to Starter Homes or other affordable products referred to in the definition of affordable housing in the NPPF. The guidance in the NPPG regarding starter homes and plan making is also of relevance. As national planning policy requires Starter Homes to form part of the affordable housing mix, and LPP1 pre-dates Starter Homes, it is considered not to be in compliance with the NPPF or NPPG in this regard.</p>	<p>The Affordable Housing SPD sets out the Council's threshold for requiring affordable housing on development sites. This reflects the requirements set out in the NPPF. A role of the SPD is to provide guidance on how a policy should be interpreted or applied. Policy AHN1 states the outdated thresholds and therefore, is not compliant with NPPF.</p> <p>Paragraph 9.6 of LPP1 refers to an annual need for 314 affordable dwellings per annum to be delivered between 2013 and 2033. The AMR report for 2019/20 indicates this target has not been met since 2013.</p> <p>More recently the Council has commissioned two evidence base studies looking at the need and affordability of First Homes. These documents also</p>	Yes	A review of the First Homes evidence base reports and potentially an update to the SHMA may be needed to establish how the provision of First Homes will affect the need and mix of affordable housing in the borough taking into account the revised housing requirement established through the Standard Methodology.

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		provide updated evidence about the affordable dwelling mix sought in the borough and supersedes the evidence in the SHMA. These post-date the evidence used to prepare LPP1.		
AHN2: Rural Exception Sites	<p>Paragraph 78 of the NPPF allows for planning policies to support housing requirements that reflect local needs including rural exception sites that provide affordable housing to meet identified local needs and for an element of market housing to be delivered on these sites for viability purposes. Policy AHN2 supports the provision of Rural Exception Sites and reflects the requirements of paragraph 78 of the NPPF.</p> <p>Paragraph 79 of the NPPF promotes sustainable development in rural areas by locating housing to support rural communities and planning policies should identify opportunities for villages to grow and thrive. Policy AHN2 supports rural communities through the provision of small-scale development in rural areas. However, the policy does not identify opportunities for local villages to grow and thrive. However, this is addressed through Policy ALH1.</p> <p>The NPPG encourages local authorities to produce policies specifying the proportion of market housing considered acceptable on rural exception sites. Policy AHN2 does not currently provide details of this. The wording in the NPPG is however, phrased as a recommendation rather than a requirement.</p>	The 2020/21 AMR confirms three rural exception schemes have been delivered in the Borough. The policy, therefore, appears to be successful in terms delivering rural exception sites. LPP1 does not include a target for the number of rural exception sites required in the Borough during the plan period.	No	No additional evidence is considered necessary at this time.

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AHN3: Housing Types and Size	<p>Paragraph 62 of the NPPF requires planning policies to cover the size, type and tenure of housing needed for different groups (including but not limited to those needing affordable housing, families with children, older people, students, people with disabilities, service families and travellers). Policy AHN3 signposts readers to the West Surrey SHMA which sets out the dwelling mix sought for new residential development. In terms of considering specific groups the SHMA has considered the needs of all the groups identified above apart from gypsies and travellers which are considered in the GTAA. Policy AHN3 partially complies with paragraph 62 of the NPPF in so far as it signposts readers to the dwelling mix.</p> <p>The NPPG requires planning policies to reflect the optional technical standards to help bring forward accessible homes. It is noted that this is addressed in LPP1. The NPPG requires strategic plan making authorities to plan for sufficient student accommodation, The SHMA considers the accommodation needs of students. Reference in Policy AHN3 to Building Regulations M4(2) Category 2 are considered to be in accordance with the NPPG however the latter also encourages local authorities to plan for housing that meets M4(1) Category 1: Visitable dwellings (the minimum standard that applies where no planning condition is given unless a plan sets a higher minimum requirement) and M4(3) Category 3: Wheelchair user dwellings. The wording of the NPPG does not make the above compulsory and as such Policy AHN3 is considered to comply with national policy.</p>	<p>The AMR compares the mix of dwellings consented and approved and compares them to the mix set out in the SHMA. The 2020/21 AMR provides the most up to date data and shows 1,958 affordable homes have been delivered since the beginning of the plan period. This equates to an average of c. 94 dwellings per annum and the SHMA identifies a need for 314 dwellings per annum. The current level of affordable housing delivery is therefore, below the level identified in the SHMA.</p> <p>Since LPP1 was adopted a number of neighbourhood plans have been made which include different dwelling mixes to that set out in LPP1, i.e., the Bramley, Chiddingfold and Witley.</p>	Yes	<p>It is recommended the comparison between the dwelling mix in the SHMA and completions and consents data is updated to reflect the most up to date evidence available.</p> <p>Consideration will also need to be given to the impact of the dwelling mixes in Neighbourhood Plans.</p>

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AHN4: Gypsies, Travellers and Travelling Showpeople Accommodation	The Government's Policies relating to Gypsy and Traveller accommodation are set out in the Planning Policy for Traveller Sites (2015).	The GTAA was published in 2018 and the fieldwork was undertaken in 2017. Since then, there have been a number of planning consents granted for additional pitches within the Borough. It is unknown currently whether the additional consents alter the need from those that meet the planning definition or those where it is unknown if they meet the definition.	Yes	An update to the GTAA is recommended to ensure the additional pitches granted consent since 2017 are considered when calculating the need for gypsy and traveller pitches during the LPP1 review plan period.
<i>Chapter 10 Employment and the Economy</i>				
EE1: New Economic Development	<p>.EE1 sets out how employment needs in the Borough will be met through</p> <ul style="list-style-type: none"> • the amount of employment floorspace needed to 2032 (16,000 sq. m of B1a/b) • specific employment site allocations. Permitting development within settlements • permitting redevelopment, intensification and expansion of existing policies • reuse and conversion of rural buildings and rural development and diversification • tourist accommodation <p>Accords with Section 6 of the NPPF that seeks support for economic growth and productivity through positive and proactive planning policies taking into account local business needs and wider development opportunities, including supporting the rural</p>	<p>The AMR shows losses of employment (and other economic) uses</p> <p>Use Class Order was amended in 2020 and use classes previously under class B1 are now under Class E (Commercial, business and service)</p>	Yes. EE1 currently relying on evidence gathered in 2016 to establish local needs. Therefore, this needs updating. However, this will also be guided by an up to date Council's economic strategy. On the supply side, an update to the	ELR AMR

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	<p>economy, although NPPF is quite detailed on how this can be achieved. However, the quantum of development to meet needs and identification of opportunities is based on the ELR 2016. The ELR relates to B uses only although other strategic policies deal with non-B uses that form part of the economy.</p> <p>Broadly complies with the NPPF but relies on the approach in the economic strategy. If the strategy conflicts with the NPPF and the Council still wants policy aligned with the strategy in LPP1 then justification will be needed.</p>		<p>evidence on gains and losses has been carried out.</p> <p>LPP1 is based on evidence that Waverley is within the same Functional Economic Market Area (FEMA) as Guildford and Woking. Further evidence will be needed to demonstrate that this is still relevant?</p>	
EE2: Protecting Existing Employment Sites	<p>EE2 seeks to allow change to other uses where there is evidence that there is no reasonable prospect of sites remaining in employment use. It is more proactive in supporting housing in that there must be strong economic reasons not to allow it. The NPPF does not specifically mention how we should deal with the loss of employment sites but maintains that both housing and economic development are important so the policy accords with the approach to take a balanced one.</p>	<p>The AMR showing losses of employment use Some NP groups were looking to set out a more prescriptive approach to considering loss of employment i.e. specific period for minimum marketing set out in policy</p>	<p>Yes, in terms of the details. Unsure whether a change to general principle of policy is needed until evidence on employment development</p>	<p>ELR AMR</p>

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			needs is completed.	
<i>Chapter 11 Town Centres and Shopping</i>				
TCS1: Town Centres	<p>The policy generally complies with NPPF paragraphs 86 and 87. Paragraph 86 sets out that planning policies should define a hierarchy of town centres and promote their long-term vitality and viability, define the extent of town centres and primary shopping areas and make clear the range of uses permitted in such locations, retain and enhance markets, allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed looking at least 10 years ahead, and recognise that residential development often plays an important role in ensuring the vitality of centres. Paragraph 87 sets out that LPAs should apply a sequential test whereby main town centre uses should be located in town centres, then edge of centre locations, and only if suitable sites are not available, should out of centre sites be considered.</p> <p>The policy still refers to primary and secondary frontages which have been removed from the NPPF and therefore will not be defined in LPP2.</p>	<p>Use Class Order was amended in 2020 and use classes previously under class A1, A2 and A3 are now under Class E (Commercial, business and service). Uses such as pubs/drinking establishments and takeaways now fall under Sui Generis. The changes to Class E allow far greater flexibility to change uses without the need to apply for planning permission thereby allowing a retail shop to be converted to a restaurant or vice versa.</p> <p>Aware that some NP groups were looking to set out a more prescriptive approach to considering loss of retail i.e., specific period for minimum marketing set out in policy.</p>	Yes in terms of ensuring it accords with changes to legislation. Furthermore potentially, in terms of details, although general principle of policy unlikely to need changing. Depends on the completion of identifying retail need as there have been significant changes to retail habits since the last retail study in 2013, particularly because of the increase in internet shopping and the pandemic.	Town Centres and Retail Study AMR

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			Consideration will also need to be given to vacancy rates within town centres and whether changes in shopping habits has resulted in demand dropping for particular sized retail units.	
TCS2: Local Centres	There are no specific paragraphs in the NPPF for local centres but the definition for town centres states that references to town centres also apply to local centres, so paragraphs 86 and 87 apply as above. The policy generally complies with these paras as it is very high level.	The Bramley Neighbourhood Plan define local centres for Bramley. LPP2 defines Milford local centre.	No	
TCS3: Neighbourhood and Village Shops	There are no specific paragraphs in the NPPF for neighbourhood and village shops and nothing specific in the NPPG.	Use Class Order was amended in 2020 and a new use class was introduced for local community uses, which includes small local shops (<280 m ²) where there is no other such facility within 1km radius of the shop's location.	No	
<i>Chapter 12 Leisure, Recreation and Culture</i>				

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LRC1: Leisure and Recreation Facilities	<p>The policy generally complies with NPPF paragraphs 98 and 99. Paragraph 98 sets out that planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities and opportunities for new provision. Paragraph 99 sets out that existing facilities should not be built on unless an assessment has been undertaken which shows the facility is surplus, the loss of the facility would be replaced by equivalent or better in a suitable location, or the development is for alternative sports/recreation provision where the benefits outweigh the loss.</p> <p>With regards to paragraph 98, it should be noted that the current policy refers to Table 2: Local Standards of Provision. This table is from the Waverley Playing Pitch Strategy 2013 which has been superseded by the Waverley Playing Pitch Strategy & Action Plan 2018. The newer document does not have an equivalent table.</p>	<p>Further evidence will need to be gathered around the need for play space and open space taking into account the areas of open space granted in new residential development since the adoption of LPP1 and reflecting the open space designations in Neighbourhood Plans. This information will need to be fed into any update to the Playing Pitch Strategy and Action Plan.</p>	<p>The policy may need to be updated depending upon the evidence gathered.</p>	<p>Review of the existing open space facilities within the borough. This gives rise to a need for an updated Playing Pitch Strategy and Action Plan to be prepared.</p>
Chapter 13 The Rural Environment (AK)				
RE1: Countryside Beyond the Green Belt	<p>Policy is very high level, but wording is still consistent with paragraph 174b) of the NPPF.</p>		No	
RE2: Green Belt	<p>Policy is very high level, but wording is still consistent with paragraphs 149 and 150 of the NPPF.</p>	<p>It should be noted that the final paragraph of the policy is now factually out of date and the detailed adjustments for Chiddingfold and Elstead have been/will be done by the neighbourhood plans rather than LPP2.</p>	<p>No, unless it is considered that additional housing is required that cannot be met on urban sites or sites in the Countryside</p>	

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			Beyond the Green Belt and that there is a need to make further changes to the Green Belt.	
RE3: Landscape Character	<p>The policy is split into a number of sections:</p> <ul style="list-style-type: none"> • Surrey Hills AONB – the policy is consistent with para 176 of the NPPF which states that great weight should be given to conserving and enhancing the landscape of Areas of Outstanding Natural Beauty. • AGLV – This is a local designation and is therefore, not addressed in the NPPF. • Waverley local landscape designations (Strategic Gap, ASVI, Godalming Hillside) – the policy is consistent with paragraphs 174a) and 175 of the NPPF. Paragraph 174a) sets out that planning policies should protect and enhance valued landscapes. Paragraph 175 sets out that plans should take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure. • Historic landscapes – the policy just seeks to continue to apply LP 2002 Policy HE12. The NPPF/NPPG no longer specifically refer to historic landscapes as these are usually captured under non-designated heritage assets (the policy for which is in LPP2). Once LPP2 is adopted, LP 2002 		The Council will need to decide what to do about the AGLV following the completion of the Surrey Hills AONB Review, which is now underway. The timescale for the AONB review will not be completed by 2024/25 but it could be completed by the time an updated LPP1 is adopted.	<p>AONB review</p> <p>AGLV Review – with other Surrey B&Ds for consistency.</p>

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	<p>policies will no longer form part of the development plan and therefore this part of the policy will be out of date.</p> <ul style="list-style-type: none"> South Downs National Park – the policy is consistent with paragraph 176 of the NPPF which sets out that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks. 			
Chapter 14 Townscape and Design				
TD1: Townscape and Design	Policy is very high level and sets out the general approach to ensuring the character and amenity of the Borough are protected and ensuring good design – more detailed and specific design policies are set out in LPP2. The policy generally complies with Chapter 12 of the NPPF.	Introduction of the National Design Guide and National Model Design Code. All LPAs should prepare design guides or codes – paragraph 129 of the NPPF sets out that these should be produced as either part of a plan or as SPDs to carry weight in decision-making.	Yes, to ensure that Design Coding is given appropriate weight	
Chapter 15 Heritage Assets				
HA1: Protection of Heritage Assets	Policy is very high level and sets out the general approach to the protection of heritage assets – policies which relate to the specific tests for heritage assets set out in the NPPF are contained in LPP2. The policy generally complies with Chapter 16 of the NPPF.		No	
Chapter 16 The Natural Environment				
NE1: Biodiversity and	Policy setting out specific separate approach to international, national and local designations and Biodiversity Opportunity Areas (BOA). Accords with general approach set out in paras	The advice from NE regarding impact on Wealden Heaths Special	Yes	Discussion with environmental statutory bodies

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Geological Conservation	174 and 175 of the NPPF. Some of the detailed implementation is set out in explanatory text. However, the detail of the NPPF is likely to change as a result of the Environment Act including the mandatory Biodiversity Net Gain (BNG) requirement.	<p>Protection Area (WHSPA) has changed. They are also looking at a strategic approach to mitigation with regard to WHSPA along with the other Wealden Heaths LPA.</p> <p>The details of the provisions of the Environment Act are emerging and these will need to be reflected in LPP1. The need for local BNG requirement can be considered once evidence is gathered?</p> <p>It is considered that the policy complies with the Sweetman judgement. The examination of LPP2 will provide greater certainty on this.</p>		<p>and Local Nature Partnership (LNP).</p> <p>Discussion with other WHSPA LPA</p>
NE2: Green and Blue Infrastructure	General strategic policy to river and canal corridors including requirement for buffer zones. Also general policy regarding biodiversity, green corridors and, trees etc. Accords with general approach set out in paras 174 and 175 of the NPPF. Some of the detailed implementation is set out in explanatory text. However, the detail of the NPPF is likely to change as a result of the enactment of the Environment Act including the BNG requirement	The details of the provisions of the Environment Act are emerging and these will need to be reflected in LPP1. Subject to evidence there may be a need for a local BNG requirement	Yes	<p>Discussion with environmental statutory bodies and LNP</p> <p>Water Cycle Study</p>

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		different than the legal requirement		
NE3: Thames Basin Heaths Special Protection Area	Policy sets out strategic solution to mitigate impact on WH SPA	It is considered that the policy complies with the Sweetman judgement.	Unlikely although will need to ascertain if evidence on and therefore changes to the approach to SANG needs to be incorporated	Discussion with NE and with other LPA to ensure consistency
<i>Chapter 17 Climate Change and Flood Risk Management</i>				
CC1: Climate Change	The policy generally complies with paragraphs 153 and 154 of the NPPF. Paragraph 153 sets out that plans should take a proactive approach to mitigating and adapting to climate change and that policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts. Paragraph 154 sets out that new development should be planned for in ways that avoid increased vulnerability to the impacts arising from climate change and can help to reduce greenhouse gas emissions.	The Council voted to adopt the Climate Emergency motion in September 2019 which sets out the Council's aim to become carbon-neutral by 2030. In 2022 the Building Regulations were updated in relation to ventilation, conservation and fuel and power and overheating.	Yes	Viability study Water Cycle Study
CC2: Sustainable Construction and Design	The policy generally complies with paragraph 154. Paragraph 154 sets out that new development should be planned for in ways that can help to reduce greenhouse gas emissions, such as through its location, orientation and design. It also sets out that any local requirements for sustainability of buildings should reflect the Government's policy for national technical standards.	Furthermore, in October 2022 the Council adopted the Climate Change and Sustainability SPD. The Planning and Energy Act	Yes	Viability study

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		<p>2008 also allows development plan policies to impose reasonable requirements for a proportion of energy used in development to be energy from renewable sources and/or to be low carbon energy from sources in the locality of the development.</p> <p>Future Homes Standard to be introduced by 2025 which will require new homes to be future-proofed with low carbon heating and world-leading levels of energy efficiency. Future Buildings Standard to be introduced by 2025 which will require new non-domestic buildings to be zero carbon ready.</p> <p>In 2019 the carbon target for the UK in the Climate Change Act 2008 was amended to 100% reduction on 1990 baseline by 2050.</p>		

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CC3: Renewable Energy Development	<p>The policy partially complies with paragraph 155 of the NPPF. Para 55 has three different aspects:</p> <ul style="list-style-type: none"> a) Plans should provide a positive strategy for renewable and low carbon energy/heat, that maximises the potential for suitable development b) Plans should consider identifying suitable areas for renewable and low carbon energy sources and supporting infrastructure c) Plans should identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems <p>The policy partially complies with point a) as it is generally supportive of renewable energy development, but it is very high level and does not provide a strategy. Part b) only sets out that plans should consider identifying areas, so although the policy does not identify areas it still complies. The policy does not comply with part c) as it does not identify opportunities for development to draw its energy supply from alternative energy supply systems.</p>	<p>The Council voted to adopt the Climate Emergency motion in September 2019 which sets out the Council's aim to become carbon-neutral by 2030.</p> <p>In 2019 the carbon target for the UK in the Climate Change Act 2008 was amended to 100% reduction on 1990 baseline by 2050 – in order for this to be met there will need to be development of renewable and low carbon energy supply systems across the country so that there is no longer a reliance on fossil fuels.</p>	Yes	Study looking at feasibility of different low carbon and renewable energy in Waverley
CC4: Flood Risk Management	<p>The policy generally complies with NPPF paragraphs 159 to 165 which set out that inappropriate development in areas at risk of flooding should be avoided and also sets out the requirements for sequential approaches and exceptions tests.</p> <p>Policy generally complies with NPPF paragraphs 167 to 169.</p>	<p>Policy refers to flood zones as defined within the Level 2 SFRA which has not been updated since December 2016.</p> <p>The policy requires SUDs on major developments in line with NPPF. However, it only encourages them in smaller schemes,</p>	No	

LPP1 Policy	Does the policy comply with the NPPF/NPPG?	Comments (e.g., compliance with other legislation, AMR monitoring conclusions, status of delivery, impact of Neighbourhood Plans etc.)	Initial indication of a need to review? (Y/N)	Potential evidence required to facilitate review
<i>Chapter 18 Strategic Sites (KD/MN)</i>				
SS1: Strategic Housing Site at Coxbridge Farm, Farnham	The site is considered to meet the requirements of paragraph 68 of the NPPF in the sense that the site is considered to be available, suitable and deliverable as demonstrated by the current planning application.	The site benefits from a resolution to grant outline planning permission for 320 dwellings (LPA Ref: WA/2019/0770). The S.106 agreement is in the process of being signed. Policy SS1 of LPP1 allocates the site for 350 dwellings. The outline planning application is for a lower quantum of development than allocated in LPP1. It is also noted the Farnham Neighbourhood Plan also allocates the site for 350 dwellings.	No	
SS2: Strategic Housing Site at Land West of Green Lane, Farnham	The site is considered to meet the requirements of paragraph 68 of the NPPF in the sense that the site is considered to be available, suitable and deliverable as demonstrated by the current planning application.	The site benefits from a full planning permission for 105 dwellings (LPA Ref: WA/2015/2283 and WA/2019/1171). The site is currently under construction by Taylor Wimpey and there have been 82 completions recorded on the site at 1	No	

LPP1 Policy	Does the policy comply with the NPPF/NPPG?	Comments (e.g., compliance with other legislation, AMR monitoring conclusions, status of delivery, impact of Neighbourhood Plans etc.)	Initial indication of a need to review? (Y/N)	Potential evidence required to facilitate review
		October 2022. Policy SS2 of LPP1 allocates the site for 105 dwellings. The permission therefore, reflects the quantum of development allocated for the site in LPP1 and the evidence available indicates that the allocation will be delivered in full during the Plan period.		
SS3: Strategic Mixed Use Site at The Woolmead, Farnham	The site is considered to meet the requirements of paragraph 68 of the NPPF in the sense that the site is considered to be available, suitable and deliverable as demonstrated by the current planning application.	The site benefits from a full planning permission for a gross of 138 dwellings and net 134 dwellings (WA/2018/0458 & WA/2020/0105(S73)). The original permission was granted on 31 October 2018 and the S73 permission was granted at appeal on 28 May 2021. The site has been cleared. Berkley Homes are the developers for the site. Policy SS3 allocates the site for 100 homes and 4,200 sqm of retail floorspace. The approved scheme exceeds the number of dwellings	No	

LPP1 Policy	Does the policy comply with the NPPF/NPPG?	Comments (e.g., compliance with other legislation, AMR monitoring conclusions, status of delivery, impact of Neighbourhood Plans etc.)	Initial indication of a need to review? (Y/N)	Potential evidence required to facilitate review
		allocated for the site but slightly underprovides in terms of the amount of retail floorspace as consent has been granted for 4,097 sqm.		
SS4: Strategic Housing Site at Horsham Road, Cranleigh	The site is considered to meet the requirements of paragraph 68 of the NPPF in the sense that the site is considered to be available, suitable and deliverable as demonstrated by the planning permission.	The site is allocated in LPP1 for 250 dwellings. The site benefits from full planning permission for a net of 268 dwellings (LPA Ref: WA/2014/1754, WA/2016/0417, WA/2017/1396 and WA/2020/0882). On 1 October 2022 the site was complete.	No	
SS5: Strategic Housing Site at Land South of Elmbridge Road and the High Street, Cranleigh	The site is considered to meet the requirements of paragraph 68 of the NPPF in the sense that the site is considered to be available, suitable and deliverable as demonstrated by the planning permission.	The site is allocated in LPP1 for 765 dwellings. The site benefits from a number of planning permissions which collectively permit 765 dwellings. Development has started on site and completions have taken place.	No	

LPP1 Policy	Does the policy comply with the NPPF/NPPG?	Comments (e.g., compliance with other legislation, AMR monitoring conclusions, status of delivery, impact of Neighbourhood Plans etc.)	Initial indication of a need to review? (Y/N)	Potential evidence required to facilitate review
SS6: Strategic Housing Site at Land Opposite Milford Golf Course	When preparing LPP1 the site was considered to meet the requirements of paragraph 68 of the NPPF. The site now benefits from full planning permission and a national housebuilder is on board to deliver the dwellings provided the covenant can be overcome.	The site benefits from a full planning permission for 190 dwellings (WA/2018/1815 and WA/2019/1095). Development has not commenced on site. The site has a restrictive covenant which will need to be removed to enable the full planning permission to be implemented. It is understood the landowner responsible is applying to the Lands Tribunal to seek to remove the covenant.	No	
SS7: New Settlement at Dunsfold Aerodrome	There are some concerns about the ability of this allocation to be delivered in full during the Plan period.	The site benefits from outline planning permission for 1800 dwellings. The site has recently changed ownership. Although development of the housing element of the scheme has not commenced on site, the infrastructure works have started on site.	No - although delay to the delivery of the full allocation within the Plan period.	Further work needed to ascertain new owners' planning strategy for delivery will be required.
SS7A: Dunsfold Aerodrome Design Strategy	Linked to the above	Linked to the above	Linked to the above	Linked to the above
SS8: Strategic Mixed Use Site	The site is considered to meet the requirements of paragraph 68 of the NPPF in the sense that the site is considered to be	The site is allocated in LPP1 for 100 homes,	No	

LPP1 Policy	Does the policy comply with the NPPF/NPPG?	Comments (e.g., compliance with other legislation, AMR monitoring conclusions, status of delivery, impact of Neighbourhood Plans etc.)	Initial indication of a need to review? (Y/N)	Potential evidence required to facilitate review
at Woodside Park, Godalming	available, suitable and deliverable as demonstrated by the planning permission and the fact development has started on site.	community and employment uses. The site benefits from a full planning permission for 97 dwellings which is slightly under the LPP1 allocation. However, to date evidence indicates that the housing allocation for Godalming parish has already been achieved and therefore this slight under provision should not impact ALH1. Development has started on site and a national housebuilder will be delivering the dwellings. The reserved matters approval makes provision for employment floorspace and space for a children's nursery. The evidence available indicates that the 97 dwellings will be delivered during the Plan period. At the 1 October 2022 there had been 2 completions on the site.		
SS9: Strategic Employment Site on Land off	The site not yet in the planning application process so will need to review whether it is deliverable.	The allocation of the site is based on the evidence of employment land need set out in the Employment	Yes	A review of the evidence in the LAA to ascertain why promoted and

LPP1 Policy	Does the policy comply with the NPPF/NPPG?	Comments (e.g., compliance with other legislation, AMR monitoring conclusions, status of delivery, impact of Neighbourhood Plans etc.)	Initial indication of a need to review? (Y/N)	Potential evidence required to facilitate review
Water Lane, Farnham		Land Review (ELR) 2016. In addition to gathering evidence on the feasibility of delivering this site, it will need to be considered in context of an update to the ELR		whether it is deliverable is needed. At the same time, establish if there is a need for the site following a further update on assessing employment land needs and monitoring of land supply.
Appendices				
Appendix A: Key Diagram of Waverley Borough		Consequential change if policies change.	Yes	
Appendix B: Updated Schedule of Saved Local Plan Policies			No	
Appendix C: Housing Trajectory 2013 - 2032		Consequential change if policies change. The housing trajectory has been updated to take into account the standard methodology.	Yes	

LPP1 Policy	Does the policy comply with the NPPF/NPPG?	Comments (e.g., compliance with other legislation, AMR monitoring conclusions, status of delivery, impact of Neighbourhood Plans etc.)	Initial indication of a need to review? (Y/N)	Potential evidence required to facilitate review
Appendix D: Explanation of Parish Housing Allocations for Policy ALH1		Consequential change if policies change. An updated Parish Housing Allocations Plan was produced for the LPP2 Hearings. Any future review of LPP1 will need to include an update to this document.	Yes	
Appendix E: Adopted Policies Map: Changes from 2002 Local Plan Proposals Map				
Appendix F: Monitoring Framework				
Appendix G: Glossary of Planning Terms				
Appendix H: Reference List				