

WAVERLEY BOROUGH LOCAL PLAN

EMERGING SPATIAL STRATEGY

Background

Waverley Borough Council has adopted a two-stage process in the preparation of the new Local Plan:

- Part 1: Spatial Strategy, key policies and strategic allocations
- Part 2: other development management policies and site allocations

In 2013 Waverley Borough Council submitted the equivalent of Local Plan Part 1 for Examination by the Planning Inspectorate. At that time the plan was known as the Core Strategy (CS). Following initial examination hearings, the Inspector recommended that the plan be withdrawn from examination. The Inspector raised concerns about the evidence of housing need and the Council's approach to meeting these needs. At the time, planning was going through a transition. The NPPF was relatively new and the South East Plan (which set the housing target for local authorities) had only recently been revoked by the Coalition Government.

Since then the Council has been focused on developing the new Local Plan taking account of the Inspector's comments. This has included updating the supporting evidence including:-

- The new Strategic Housing Market Assessment (SHMA) that was jointly commissioned with Guildford and Woking Borough Councils. The latest version of the SHMA was published by the Council on 1st October 2015.
- Updating the Land Availability Assessment (LAA), to accompany the new Local Plan.
- Updating the Employment Land Review (ELR). An update was published in November 2014.
- The Green Belt Review (published August 2014)
- A Landscape Review (published August 2014)
- A Strategic Transport Assessment (STA)(dated September 2014)
- A more detailed transport assessment, building on the findings of the STA, is being produced
- Level 1 Strategic Flood Risk Assessment Update (published July 2015)
- A Level 2 Strategic Flood Risk Assessment is in draft and is awaiting comments from the Environment Agency.

Other key supporting work includes an on-going dialogue with infrastructure and service providers to identify the implications of the emerging Spatial Strategy on current infrastructure and services and to identify the need for any new/upgraded

infrastructure. There is also the supporting work in terms of Sustainability Appraisal and Habitats Regulations Assessment.

Consultation on Housing Scenarios

In September/October 2014 the Council consulted on four alternative scenarios for the distribution of new homes across Waverley. In each case the scenario identified how the Borough might accommodate the 470 homes a year identified in the draft SHMA. In effect these were alternative spatial strategies.

Given the constraints of the Green Belt and the AONB, the areas identified with most potential were sites around Farnham and Cranleigh, which are not within the Green Belt or AONB, and the Dunsfold Aerodrome site. Scenario 1 did not include any housing at Dunsfold Aerodrome and therefore had the highest level of greenfield development around Farnham and Cranleigh. Scenarios 2-4 included different levels of housing at the Aerodrome site (1,800, 2,600 and 3,400 respectively). These are levels of growth being actively assessed by the site's promoters and a planning application for 1,800 homes is expected shortly.

The consultation provided the opportunity for residents and other interested parties to comment on these scenarios and other matters relevant to the Local Plan, so that these comments could be taken into account by the Council in moving the Plan forward.

Over 4,000 individuals/organisations responded to the consultation. Of these, 80% supported the scenario that included the highest amount of development (3,400 homes) at Dunsfold Aerodrome. A comprehensive summary of the responses formed part of the earlier report to the Executive in March 2015.

It was clear from that consultation that there was strong support for the use of the Dunsfold Aerodrome site to provide some of the housing required to meet the identified needs.

Transport Issues

Given the importance of transport matters in shaping the Local Plan, the Council has commissioned consultants to undertake a more detailed transport assessment. This builds on the earlier Strategic Transport Assessment undertaken by Surrey County Council and considers the potential impacts of alternative strategies on identified 'hotspots' on the highway network. These are mainly in and around Farnham and on the A281 north of Alfold. The transport assessment is also considering the wider transport sustainability credentials of the alternative spatial strategies.

Alongside the work that the Council has commissioned in relation to transport, Dunsfold Aerodrome are also preparing the necessary evidence on transport and other matters to support a planning application for 1,800 homes.

In March the Council received an update report on the Local Plan and recognised that, subject to the outcome of the more detailed transport assessment, including some housing at Dunsfold Aerodrome may offer the best opportunity to meet housing needs.

It has to be recognised that housing on the Aerodrome albeit a scheme proposing 2,600 homes has been previously dismissed on appeal.

Housing Need

The NPPF requires that Local Plans meet objectively assessed needs for development, including the need for new homes, unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against other policies in the NPPF. The evidence of housing need both within Waverley, and the wider housing market area, which includes Guildford and Woking, is set out in the West Surrey Strategic Housing Market Assessment (SHMA). The most recent version was published on 1st October 2015. This identifies a need for 519 homes per annum in Waverley. Therefore, over the whole plan period from 2013 to 2032 the requirement would be for 9,861 new homes in Waverley.

Green Belt

Given the requirement in National Planning Policy to consider all reasonable options for delivering the amount of housing required to meet needs, the Council commissioned consultants to undertake a Green Belt review in 2014. This looked at the whole Green Belt in Waverley, in order to assess whether it fulfils its designated purpose.

The review concluded that the overwhelming majority of Waverley's Green Belt still fulfilled its designated purpose but did identify limited areas where changes to the Green Belt boundary would not compromise the role and purpose of the Green Belt in Waverley. This included removing two locations north of Godalming, adjoining the borough boundary. In addition the five large villages that are in the second tier of the Settlement Hierarchy (Bramley, Chiddingfold, Elstead, Milford and Witley) are all within the Green Belt and the Green Belt review considered the role of the Green Belt in these areas. It concluded that in the cases of Chiddingfold, Elstead, Milford and Witley there was scope to both remove these from the Green Belt and to allow some expansion to the settlement boundaries to provide space for these villages to grow. The Green Belt Review also identified some areas around Farnham and Cranleigh where there may be scope to extend the Green Belt.

The benefits of accepting the Green Belt Review findings are that it:-

- Demonstrates that the Council has explored the option of using Green Belt land to meet housing supply;
- Should be seen as a positive endorsement of the role that most of Waverley's Green Belt plays;
- Ensures that Green Belt boundaries accord with the NPPF
- Allows some planned growth at Green Belt villages; and
- Has the potential for giving additional protection in some areas.

An issue for consideration is that when consulted last year 52 % of those who responded were opposed to the potential changes to the Green Belt. Only 30% were in support with the remainder not expressing an opinion.

Components of housing supply

For the purposes of the emerging spatial strategy, the key components of housing supply are:-

- Completions between 2013 and 2015
- Outstanding planning permissions
- Any allocations in the existing Local Plan (assuming these are still considered to be appropriate)
- An estimate of the continued supply of housing from windfall sites (i.e. sites that have not previously been identified by the Council)
- Sites that do not have planning permission but that have a reasonable prospect of being both available and suitable for housing within the plan period.

In relation to the final point, the main source of evidence will be the Land Availability Assessment (LAA) (formerly known as the Strategic Housing Land Availability Assessment). In terms of potential new sites, the LAA includes sites within settlements and sites outside settlements, including rural brownfield sites. The most recently published LAA was published in September 2014 with a base date of 1st April 2014. That document is in the process of being updated to a new base date of April 2015 but will continue to be revised as further sites are promoted.

The Emerging Spatial Strategy

National planning policy, together with the work done to date including the evidence base, sustainability considerations and the outcome of the consultation in 2014, point to the following principles that should underpin further work. These are:-

1. As far as possible, directing development to the most sustainable locations:-
 - in/around the four main settlements (Farnham, Godalming, Haslemere and Cranleigh);

- moderate development in large villages (Bramley, Chiddingfold, Elstead, Milford and Witley)
 - Some limited planned growth in/around other villages (Alfold, Churt, Dunsfold, Ewhurst, Frensham, Tilford, Shamley Green, Womersley) – recognising that those villages not within Surrey Hills AONB or green belt offer more scope for growth
 - No planned growth in the smallest villages, i.e. only windfall developments.
2. Maximising opportunities on suitable brownfield sites, including rural brownfield sites – reflecting the direction of Government policy.
 3. Where greenfield development is planned, avoiding major development on land of the highest amenity value (e.g. the Surrey Hills AONB).
 4. Acknowledging the findings of the Green Belt Review 2014
 5. Avoiding/mitigating any potential adverse impact on European designated sites (Special Protection Areas) through the location of development, the provision of SANG where necessary and other appropriate measures.
 6. Ensuring that where new infrastructure is needed, it is provided alongside new development. This includes funding through the Community Infrastructure Levy (CIL).
 7. Having regard to the need for affordable homes
 8. Taking account of the availability of suitable sites

With regard to the Green Belt (point 4 above). The acceptance of the findings of the Green Belt Review is subject to discussions with the relevant towns/parishes about the fit with emerging neighbourhood plans, to ensure that local communities are involved in the setting of boundaries locally.

Further work to develop the Spatial Strategy and write the Plan itself will be informed by the sustainability appraisal.

As stated above, there are a number of components of housing supply. It is estimated that existing commitments (completions since 2013, sites with planning permission (or a formal resolution to grant planning permission), existing Local Plan allocations and estimated windfalls) will deliver approximately 3,200 homes.

The following table shows completions since 2013 and outstanding planning permissions as at 1 April 2015:

Table 1: Dwellings completed since 2013 and outstanding planning permissions

	Completions 2013-2015	Outstanding planning permissions as at 1st April 2015	TOTAL
Farnham	111	447	692
Godalming	107	582	690
Haslemere	60	242	168
Cranleigh	44	173	217
Rest of Waverley	45	259	304
TOTAL	367	1,703	2,071

In addition, it is estimated that sites within settlements that have potential for housing will deliver an around an additional 700 homes. This leaves a potential shortfall of around 5,961.

It is also estimated that around another 2,900 homes can be delivered on greenfield and other sites outside settlements. This is based on a preliminary re-assessment of sites in the 2014 SHLAA and new sites that have emerged since then. This reduces the shortfall to around 3,061. This information is set out in Table 2 below:

Table 2: Potential Housing Supply (01.04.15)

Overall Need	9,861 (519pa)
Commitments (completions, permissions and windfalls)	3,200 (approx.)
Additional sites within settlements	700 (estimate)
Additional sites outside settlements	2,900 (estimate)
Supply	6,800 (estimate)
Shortfall	3,061(estimate)

Making up the shortfall

The Council will be expected by the Inspector to show that it has made every effort to find additional sites to make up the shortfall.

One option for reducing the shortfall would be consider the scope for increasing the amount of development within settlements. This would mean either increasing densities in existing residential areas or releasing other non-residential brownfield land for housing. However, beyond the sources of housing already identified, the scope to deliver more housing from these sources is limited. Increasing densities would have implications for the character of settlements. The scope to release other land for housing is also limited. For example, existing employment land may be required to continue to meet the needs of the local economy.

In relation to land outside settlements, the scope to identify sites is constrained by the desire to avoid major development in the AONB and the fact that the Green Belt Review has confirmed that most of Waverley's Green Belt land is fulfilling its purpose.

The options, therefore, are either to allow more greenfield development within areas not constrained by Green Belt or AONB, or to identify suitable rural brownfield land. In relation to greenfield land, the most suitable locations are around Farnham and Cranleigh, as these are the largest settlements that are beyond the Green Belt and not significantly affected by the AONB. By contrast, the land around Godalming and Haslemere is much more constrained by Green Belt and/or AONB.

In sustainability terms it is necessary to ensure that the amount of development planned around the non-Green Belt, non-AONB settlements reflects the size of the settlement and its position in the Settlement Hierarchy. Therefore, whilst there are some small villages that are also outside the Green Belt and AONB, it is not considered that these are appropriate locations for significant housing growth, due to the limited availability of services.

In terms of suitable rural brownfield land, with the exception of Dunsfold Aerodrome, the potential opportunities are very limited. Those available sites that could have potential have largely been considered in the LAA. Dunsfold Aerodrome itself is being actively promoted as a potential allocation in the Local Plan for a new settlement containing between 1,800 and 3,400 dwellings, a scale sufficient to support the provision of additional services and facilities.

From the above it is clear that in terms of addressing the shortfall identified in Table 2 above the Council has two main choices. These are either to allow significant housing development at Dunsfold Aerodrome or to significantly increase the level of greenfield development around Farnham and Cranleigh. Elsewhere the choices in terms of the level of growth are much more limited for the reasons set out above. The choices the Council finally makes on these issues will be informed by the Sustainability Appraisal.

Given the amount of housing required to meet needs, the estimate of 2,900 homes outside settlements in Table 2 already draws heavily on promoted greenfield sites around Farnham and Cranleigh. Meeting the remaining shortfall of around 3,000 from further greenfield releases may have implications for the landscapes around these settlements.

The Executive has previously recognised that delivering some housing at Dunsfold Aerodrome may offer the best opportunity to meet the Council's housing needs. Planning for a settlement of 1,800 homes at Dunsfold Aerodrome would reduce the

deficit to around 1,200. A planning application is expected in the near future for a new settlement comprising 1,800 homes.

Including any housing at Dunsfold Aerodrome within the overall strategy is still subject to the satisfactory outcome of transport assessment work. However, if a development at Dunsfold Aerodrome can be achieved in transportation terms, with suitable mitigation, it would have a number of clear advantages, including:-

- Maximising brownfield land
- Avoiding development on greenfield sites
- Providing an opportunity for a balanced community, including jobs, homes and services
- Co-ordinated approach to infrastructure delivery
- Would reflect the support in the earlier consultation on scenarios for housing at Dunsfold Aerodrome.

Given the current uncertainty around the transport assessment, the potential of Dunsfold Aerodrome is that it may have capacity for 1,800 homes. However, it is recognised that, subject to the outcome from the transport assessment and other evidence, delivery of 2,600 or 3,400 homes on the site could be a longer term opportunity.

It is anticipated that a significant proportion of the 1,800 homes at Dunsfold Aerodrome, as well as the majority of housing from the other sources of supply identified in Table 2 above, could be delivered in the first 10 years of the plan post adoption (i.e. by 2027). It should also be noted that if this level of supply does come forward within this period then, annually, it would exceed the need figure of 519 homes. The challenge would then be the delivery of housing in the last 5 years of the plan period (i.e. 2027 to 2032). Even with 1,800 homes at Dunsfold Aerodrome, there would still be a shortfall over the whole plan period to 2032 of around 1,200. The options for meeting this shortfall would be:

- Allow more homes at Dunsfold Aerodrome;
- Identify further greenfield opportunities, principally around Farnham and Cranleigh; or
- A mix of both.

There have been circumstances elsewhere where uncertainty about housing delivery in the latter part of the Plan period has led to a plan that only fully covers a shorter period or does not meet in full its objectively need with a commitment to an early review of the Plan once these uncertainties have been resolved. Given the current uncertainties around Dunsfold Aerodrome, as well as the on-going issue of assessing the implications of Waverley growth and Guildford growth on the A3, the Council is liaising with CLG to identify if this could be a reasonable approach for Waverley so that a Local Plan can be adopted with a degree of certainty for the first 10 years post-adoption, even if it requires an early review.

Notwithstanding the above the Council will continue to test the deliverability of the Strategy against sustainability criteria and will work with infrastructure providers to ensure that the necessary infrastructure can be put in place to support the delivery of new housing.