

**WAVERLEY BOROUGH LOCAL PLAN PART 1 EXAMINATION**

**RESPONSE FROM WAVERLEY BOROUGH COUNCIL TO THE INSPECTOR'S QUESTIONS FOR THE COUNCIL FOLLOWING THE CONSULTATION ON THE PROPOSED MODIFICATIONS**

**Q1. Please can the Council supply a narrative to explain the updated housing figures in the main modifications, for the component parts of the housing trajectory and 5 year supply. In the narrative, can the Council explain whether a lapse rate is or is not included in the figures for sites with planning permission, and provide an explanation to give reassurance that the figures for large windfall sites and LAA, Part 2 and NDP sites (Table 6.1 items F and J) does not involve double counting?**

1.1 In its response to question 3 of the Local Plan Inspector's Matters and Issues for examination (WBC-LP1 – 4), the Council set out a narrative that explained how the housing trajectory appended to the responses under Appendix 4 (WBC-LP1 – 4d) demonstrated how the housing figure set out in the submitted Local Plan will be delivered. This trajectory was supported by

- the Housing Land Supply and Housing Trajectory Contextual Note, Troy Planning and Design, May 2017 (CD2/49)
- the Assessment of Sites for the Waverley Housing Trajectory (CD2/50)
- the Dunsfold Aerodrome Delivery Rates Assessment, November 2016 (CD2/42).

1.2 Table 1.0 below sets out how the housing trajectory in MM4 of LPP1 Main Modifications September 2017 (Appendix C), differs from the previous housing trajectory in Appendix 4 of the Council's responses to the Inspector's Matters and Issues. The Council has updated its Assessment of Sites for the Housing Trajectory for MM4 which is attached as Appendix 1 to this response. This update continues to rely on the evidence for assessing the delivery of housing sites set out in Housing Land Supply and Housing Trajectory Contextual Note by Troy Planning (CD2/49) and the Dunsfold Aerodrome Delivery Rates Assessment, November 2016 (CD2/42).

1.3 The Council's five year housing land supply position is set out in the housing trajectory. The five year housing supply position is based on the housing requirement of 590 new homes a year as set out in MM3 of the Main Modifications to Local Plan Part 1, September 2017. The Council continues to use a buffer of 5% in accordance with the Local Plan Inspector's note on the five year housing land supply buffer (ID-5). The Council's reasons for considering this buffer appropriate is set out in its five year housing land supply position statement which has a base date of 1<sup>st</sup> April 2017 (CD2/53). The Council also continues to use the Sedgefield approach by assessing to meet the entire shortfall in housing supply against its housing requirement from 1<sup>st</sup> April 2013 in the first five years.

1.4 The Council considers that the explanation of the housing trajectory set out above demonstrates that the housing requirement set out in MM3 of the Main Modifications to Local Plan Part 1 will be delivered and that there will be a rolling five year supply of housing.

**Table 1. Explanation of the change in figures from the housing trajectory set out in the response to the Inspectors M and I Question 3 in May 2017 (Appendix 4) to the updated housing trajectory set out in MM4 of LPP1 September 2017 (Appendix C)**

Component of Supply	Housing Trajectory May 2017	Housing Trajectory September 2017	Explanation of figures and change
Base Date	1 <sup>st</sup> April 2017	1 <sup>st</sup> April 2017	No change
Completions	1048	1048	No change
Outstanding Planning Permissions (small sites)	484	437	The Council has now applied a 10% lapse rate to the figure in the updated housing trajectory of homes with outstanding planning permission on small sites as of 1 <sup>st</sup> April 2017. The Council continues to consider that the delivery of all the homes will take place in the first five years. However, due to small number of homes on small sites it has not assessed the delivery of each site individually for each year. Instead it has split the total number of homes from this component of supply with the 10% lapse rate equally for each of the five years.
Outstanding Planning Permissions (large sites)	2622	2622	No change to the housing trajectory. The Council has not included a lapse rate to this component of supply as the Council has realistically assessed the delivery of homes on each large site that has outstanding planning permission using the Housing Land Supply and Housing Trajectory Contextual Note by Troy Planning (CD2/49).  See Table A of Appendix 1
Resolution to	445	445	No change to the total amount of housing for this component of housing supply

permit			<p>in the housing trajectory.</p> <p>However, although the total amount has not changed, the Council has estimated that the Knowle Park Initiative, Cranleigh (part of strategic site SS5), will deliver 35 homes in 2020/21 and then 50 a year from 2021/22 to 2024/25 and then 30 in 2025/26. The previous housing trajectory assessed that the first homes on this site would not be delivered until 2022/23. This change is as a result of information from the developers sent to the Council in May 2017 after the previous trajectory was prepared which indicated that the first homes would be completed in 2018/19. The Council has taken a more cautious approach to the timing of the delivery of homes on this site than the developers. However, as a result of the homes being delivered in 2020/21 and 2021/22 it means that the number of homes delivered from this component has dropped in 2023/24 to 2025/26 with no completions from this component of housing supply in the year 2026/27.</p> <p>See Table B of Appendix 1</p>
Dunsfold Aerodrome	2600	2600	<p>No change to the housing trajectory. The Council continues to consider that the evidence in the Dunsfold Aerodrome Delivery Rates Assessment, November 2016 (CD2/42) is a realistic assessment.</p> <p>See Table C of Appendix 1</p>
Strategic allocations	735	740	<p>The additional five homes in this component of housing supply is to reflect the current planning application for 105 dwellings for the site at Green Lane, Badshot Lea, Farnham (Planning Application reference no: WA/2015/2283).</p> <p>See Table D of Appendix 1</p>
Farnham Neighbourhood	0	175	<p>This is a new component of housing supply which reflects the allocations in the Farnham Neighbourhood Plan, which was made on 28<sup>th</sup> July 2017, that do not</p>

Plan allocations			<p>have a planning permission on 1<sup>st</sup> April 2017 or are not an allocation in the Local Plan Part 1. In the previous housing trajectory some of the sites allocated in the Farnham Neighbourhood Plan would have been included under a different component of housing supply. However, these sites have now been removed from the other components of supply so that there is no double counting.</p> <p>See Table E of Appendix 1</p>
LAA Within settlements	501	656	<p>This component of supply now includes the 250 dwellings estimated to come forward from land between Aarons Hill and Halfway Lane, Godalming as a result of MM12 of the main modifications to Local Plan Part 1, September 2017. Likewise, 95 dwellings at Part of SSE Farnham Depot, Lower Weybourne Lane, Farnham no longer contributes to this component of housing supply as it is now included as an allocation for housing in the Farnham Neighbourhood Plan.</p> <p>See Table F of Appendix 1</p>
LAA Outside settlements in NPs and LPP2	1041	1,525	<p>The number in the housing trajectory for MM4 is the number of homes that need to be allocated in the Local Plan Part 2 or in Neighbourhood Plans to meet the housing requirement of 11,210 new homes after all other components of housing supply have contributed. Some of the sites have been identified as having the potential for housing development in the Council's Land Availability Assessment (CD2/01). These and other sites will be identified and allocated through the preparation of the Local Plan Part 2 and individual Neighbourhood Plans in Waverley. Paragraph 3.1.11 of the Council's response to the Inspectors M and I (WBC-LP1 – 4) sets out the Council's rationale for including sites outside settlements identified in the LAA contributing to housing supply. It states that although homes on these sites will make a contribution to housing supply, the Council has not assessed each site individually as this would prejudice the allocation of sites through the preparation of Local Plan Part 2</p>

			<p>and Neighbourhood Plans. For the purposes of the main modifications to the Local Plan Part 1, the Council continues to consider that the approach to this component of housing supply is robust and has not assessed the delivery of each individual site.</p> <p>The previous housing trajectory set out in the responses to the Inspector's M and I (WBC-LP1 – 4) assessed all the homes from this component of supply being delivered in the five years from 2020/21 to 2024/25. For the updated housing trajectory the amount has been divided equally amongst each year of the Local Plan from 2020/21 to the end of the plan period. This is to take a more cautious approach to delivery and to take into account the additional time to deliver the higher housing requirement set out in MM3 of the main modifications to Local Plan Part 1. It also allows for the allocation and subsequent delivery of sites through Local Plan Part 2 and Neighbourhood Plans.</p> <p>See Table F of Appendix 1</p>
Small windfall sites (1 - 4)	415	468	<p>Paragraphs 5.2 to 5.5 of the Council's Housing Implementation Topic Paper (CD2/04) and paragraph 3.1.8 of the Council's response to the Inspector's M and I sets out the Council's approach to homes on small windfall sites (WBC-LP1 – 4). The approach in the updated housing trajectory continues to be based on the annual average of past rates of delivery from 2003 but the total number of completions on windfall sites from 2016-17 has now been taken into account in projecting the amount that is assessed to come forward in the plan period. The Council continues to consider that small site windfalls will only come forward from 2020/21 to avoid double counting with outstanding planning permissions on small sites as of 1<sup>st</sup> April 2017.</p> <p>See Table G of Appendix 1</p>
Large windfalls	458	494	Paragraphs 5.6 to 5.8 of the Council's Housing Implementation Topic Paper

(5 or more)			<p>(CD2/04) and Paragraph 3.1.8 of the Council's response to the Inspector's M and I (WBC-LP1 – 4) sets out the Council's justification for considering that homes on large windfall sites will contribute to housing supply. The approach in the updated housing trajectory continues to be based on the annual average of past rates of delivery from 2003 but the total number of completions on windfall sites from 2016-17 has now been taken into account in projecting the amount that is assessed to come forward in the plan period. The Council continues to discount the total number of homes from large windfall sites by 15% and that these homes will only come forward in the last five years of the plan from 2027/28.</p> <p>In paragraph 5.8 of its Housing Implementation Topic Paper, the Council stated that it was likely that housing from large windfall sites would come forward because sites on some existing employment sites could become suitable as a result of a change in the prospects for the site continuing in employment use. Furthermore, there was evidence of office to residential conversions resulting from permitted development taking place since the legislation changed in 2013 so it was likely this would continue. In the Council's view homes from these sites could come forward before the last five years of the Local Plan. However, the Council considered that for the purposes of the housing trajectory a more cautious contribution from this component of housing supply should be made, so assessed delivery from the last five years of the Local Plan only.</p> <p>There is no double counting of large windfall sites and homes being delivered on LAA sites identified in Part 2 or in Neighbourhood Plans. LAA sites will require specific identification and subsequently allocation in Local Plan Part 2 or neighbourhood plans. However, homes from large windfall sites are currently unidentified and unavailable but the Council remains of the view that sites will still become suitable and available for housing, either as a result of changed circumstances for employment sites or through permitted development legislation. The Council also continues to consider that homes on large windfalls are likely to be delivered before the last five years of the Local</p>
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			<p>Plan but the updated housing trajectory should still take a cautious approach to their contribution and assess their delivery from 2027/28 only. Therefore it is realistic to assume that homes from large windfall sites will be delivered at the same time as sites that have been identified earlier in the Local Plan period in the LAA and then allocated in the Local Plan Part 2 or a Neighbourhood Plan.</p> <p>See Table H of Appendix 1</p>
Total	10,349	11,210	