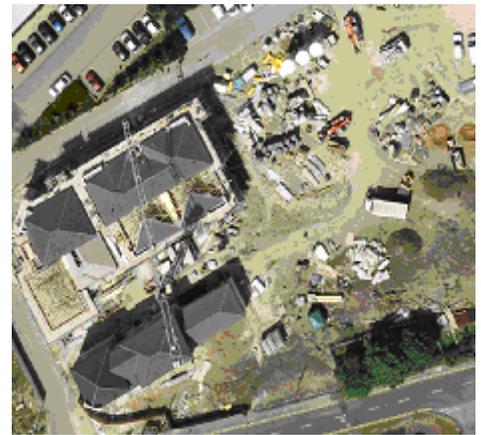


Housing Options Technical Document

Consultation: January 27th to 31st March 2010



Region

Consultation on Housing Options for the Core Strategy	3
Options for the Location of Development	15

Appendices

1 Summary of Main Issues in Planning Policy Statement (PPS) 3 Regarding the Location of New Housing	20
2 Summary of the Main Issues in the South East Plan (2009) Regarding the Location of New Housing	23
3 Main Issues Arising from the Strategic Housing Market Assessment	26
4 Summary of Responses to the Core Strategy Topic Paper Consultation Relating to the Location of New Housing	28

Consultation on Housing Options for the Core Strategy

Waverley Borough Council | Housing Options Technical Document

Introduction

1 Waverley Borough Council is producing its Local Development Framework (LDF), which will set out the planning policies that will be used to guide and manage new development in the coming years. The LDF will contain a number of documents which, over time, will replace the existing planning policies that are in the Waverley Borough Local Plan.

2 The most important document in the LDF will be the Core Strategy. As the name suggests, the Core Strategy will set out the overall planning framework for Waverley and the key policies needed to deliver this strategy. One of the main issues that the Core Strategy will have to address is the Council's approach to delivering the amount of new housing that is required in Waverley in the period up to 2026.

3 The purpose of this consultation is to seek the views of the local community and other key stakeholders on some options for delivering this housing. The consultation response questionnaire itself is contained in the associated non-technical summary document. This will build on previous consultations when the Council has invited views on this important subject. In February 2009, the Council consulted on Topic Papers, which set out issues and options for the Core Strategy. One of the Topic Papers included questions regarding the amount of new housing the Council should plan for, and the location of housing.

4 This consultation differs from the earlier consultations, because the options have been worked-up in more detail and because there is more supporting evidence available to help to explain the context and potential implications of these options.

5 It should be pointed out that the purpose of this consultation is to look at further options for the location of housing generally. It will be necessary, in due course, to consider issues of housing need, for example the need for affordable housing and the need for housing for specific groups, for example in response to the age profile of the local population.

How Many New Homes Must the Council Plan For?

6 In May 2009 the Government published the South East Plan. This identifies the amount of new housing required in the South East region and allocates this across all the relevant local authorities. The South East Plan requires that local authorities across the South East allocate sufficient land and facilitate the delivery of a total of **654,000** net additional dwellings between 2006 and 2026. Waverley's contribution to this is to provide for at least **5,000** net new dwellings in that 20-year period, (an average of **250** dwellings per annum.)

National and Regional Policy

7 The policies in the Council's LDF, including the Core Strategy, must comply with National planning policies and must be in conformity with the policies in the South East Plan.

National Planning Policy

8 The Government's main planning policy document dealing with housing matters is Planning Policy Statement (PPS) 3 – "Housing". Attached as **Appendix 1** is a summary of the main issues in PPS3 that have a bearing on the location of housing.

9 One of the key messages in PPS3 is that the Council must be more pro-active in its approach to the provision of new housing. This means being less reliant on "windfall sites". These are sites that have not previously been identified/allocated for housing by the Council. In the past, a very large proportion of new houses built in Waverley have been on windfall sites.

10 According to PPS3, the Government's objective is to ensure that the planning system delivers a flexible, responsive supply of land. This means setting out the strategy for delivering new housing, including identifying broad locations and specific sites, to enable a continuous delivery of housing for at least 15 years from adoption of the Core Strategy. As the anticipated date for adoption of the Core Strategy is 2011, this means having a strategy to deliver housing up to 2026.

11 There is a particular focus on identifying enough specific **deliverable** sites to deliver housing for the first 5-years.

12 In terms of the location of housing, the preference is to build in locations that offer a range of community facilities and have good access to jobs, key services and infrastructure. There is also a preference for making effective use of land by re-using previously developed land (PDL). PPS3 refers to the national target that at least 60% of new housing should be on PDL.

13 Other Government guidance/policy relevant to the broad location of new housing include PPS1, PPS7 and PPG13.

The South East Plan 2009

14 The South East Plan does more than just setting out the housing allocations for each local authority. There are many other policies that will have a bearing on decisions about where new housing should go. Attached as **Appendix 2** is a summary of the main South East Plan policies that are relevant to the location of housing.

15 Policy SP3 relates to urban focus and urban renaissance. It states that the prime focus for development in the south east should be urban areas, in order to foster accessibility to employment, housing, retail and other services, and avoid unnecessary

travel. It states that local authorities should formulate policies to concentrate development within or adjacent to the region's urban areas, with a target of at least 60% of new development being on PDL.

The Surrey Sustainable Community Strategy

16 The draft Surrey Sustainable Community Strategy (SSCS) was published for consultation between November 2008 and February 2009. It is a plan for achieving a better Surrey, as set out in the Vision for Surrey in 2020. Where relevant, it is important that the LDF Core Strategy takes account of priorities identified in the Community Strategy.

17 The SSCS identifies 10 priorities, to be addressed through five thematic partnerships. The priorities most relevant to the issue of housing supply are:

- Improve the global competitiveness of Surrey's economy through sustainable growth;
- Make Surrey's economy more inclusive;
- Help people in Surrey to achieve more sustainable lifestyles; and
- Create better, more sustainable developments that deliver more social, environmental and economic benefit.

18 In relation to the economy, the SSCS refers to the high house prices in Surrey and the need to provide more affordable homes for key workers, lower earners, young people and migrant workers.

19 One of the Thematic Groups deals with Housing, Infrastructure and Environment. It envisages a Surrey in which housing is affordable, built in sustainable communities with supporting infrastructure. It also refers to facilities being within easy access to reduce car-use and travel options being better organised, helping Surrey to achieve a low carbon society.

20 The Group recognises that the challenge is to provide the level of development necessary to meet people's needs and sustain a successful economy while preserving Surrey's character and natural environment.

Housing Supply in Waverley

21 As explained above, the majority of new housing in Waverley has traditionally come forward on windfall sites. It has also been the case that the Council has consistently managed to meet its annual housing requirement through development within settlements, without the need to identify and release greenfield sites. In fact, over the first three years of the South East Plan period (2006-2009), annual completion rates averaged 342 dwellings, exceeding the 250 per annum required by the South East Plan.

22 Notwithstanding this, PPS3 requires a new approach which is less reliant on windfall sites. In previous housing projections, the Council would have made an assessment of likely future supply based on past performance. This “windfall allowance” would have been included in the Council’s projections for future housing supply.

23 Since the introduction of PPS3, there have been other LDF Core Strategy Examinations where the role of windfall sites has been considered. The Planning Inspectorate has also considered this issue in the document “Local Development Frameworks (Examining Development Plan Documents: Learning from Experience)” September 2009. Evidence from these suggest that it may be difficult to justify an allowance for windfall sites in the first 10 years of the 15-year period. Even in the period from years 11-15, it is expected that local authorities wishing to include an allowance for windfalls will have to have good reasons for doing so.

The Strategic Housing Land Availability Statement (SHLAA)

24 An important piece of evidence relating to housing supply is the Strategic Housing Land Availability Assessment (SHLAA). The SHLAA was produced by Baker Associates on behalf of the Council. It was carried out in two phases. The first phase sought to identify potential sites within existing settlements. The threshold was to seek to identify sites capable of accommodating six or more additional dwellings.

25 The second phase was to examine the potential for greenfield releases around the four main settlements of Farnham (including Badshot Lea), Godalming, Haslemere (including Beacon Hill and Hindhead) and Cranleigh, together with the five next largest villages, namely, Bramley, Chiddingfold, Elstead, Milford and Witley. This second phase also involved looking at some specific brownfield sites in rural locations (Dunsfold Park, the Weyburn Engineering and Tanshire Holdings sites outside Elstead, Milford Hospital and the Shackleford Mushroom Farm).

26 The SHLAA is not a static document. The Council is already working on an update to the SHLAA to ensure that the evidence on housing supply is as up-to-date as possible when the Core Strategy is finalised.

The Current Housing Supply Position in Waverley (as at 1st April 2009)

27 In terms of meeting the housing requirement for the South East Plan Period of 2006 to 2026, the following initial sources of supply have been considered:-

- Houses already completed in the period 2006 to date;
- Unimplemented or partially implemented planning permissions;
- Sites where there is a resolution to grant permission;
- Sites already identified in the Waverley Borough Local Plan 2002 that are considered to have development potential, (such as Milford Hospital, the town centre key sites and the land at Bourne Mill)

28 In addition, the SHLAA identifies specific sites within settlements that are considered to have potential to deliver housing.

29 The approach to meeting the South East Plan housing target has been to start by identifying sources of new housing within the settlements. Therefore, the options on which the Council is consulting all have one thing in common. They all presuppose that a proportion of new housing development will continue to take place within the four main settlements (Farnham, Godalming, Haslemere and Cranleigh), reflecting the broad thrust of national and regional policy. Therefore, the five options that form the basis of this further consultation are all about how to deal with the additional housing that is required over and above what can be provided within the main settlements. An added factor will be what allowance, if any, the Council makes for windfall sites.

30 Two other factors will need to be considered:-

- The SHLAA is not a static document. The published SHLAA is based, in part, on data from 2007 and 2008. The Council is already going through the process of updating the SHLAA. This is particularly with a view to identifying any further opportunities for development within settlements. Clearly if further suitable sites are identified, then this will have the effect of reducing any shortfall. One aspect of this consultation will be an opportunity for landowners, developers etc. to identify any additional sites that should be considered as part of the update to the SHLAA.
- Even though the Council has limited scope to identify a windfall allowance in advance, these site will still come forward. The Council will continue to monitor the amount of new housing that is built on windfall sites. Their contribution towards housing supply will potentially reduce the residual housing requirement to 2026. In turn, this may reduce the amount of greenfield land needed to deliver the required amount of new housing. There will need to be a mechanism to phase/control the release of sites, particularly potential greenfield sites, taking account of the year-on-year monitoring of housing completions and new permissions, set against the overall target.

31 The housing supply position in Waverley as at April 2009 was as follows:

Source	Number of Dwellings	Comments
Completions 2006 -2009	1026	
Outstanding Planning Permissions	623	
Sites where there is a resolution to grant permission	257	This includes the East Street scheme in Farnham
Sites within settlements identified in the SHLAA as having potential for housing	564	This excludes the SHLAA sites where planning permission has been granted since April 2008

Source	Number of Dwellings	Comments
Other identified sites	120	This is Milford Hospital
Total	2590	

Housing Supply Position in Waverley as at April 2009

32 As explained above, there may be scope to include a windfall allowance, particularly in the final 5 years of the 15 year period. The Council will keep this under review as the Core Strategy is developed and as this issue continues to be clarified through LDF examinations and other sources. As it stands, however, it is considered that there may be a reasonable case to make some allowance for windfalls after the first 10 years of the plan period. The justification for this would be:-

- Given the character of Waverley, it is difficult to identify in advance specific sites within the built-up areas.
- Notwithstanding this, delivery of these sites continues to be high, as evidenced by past completion rates. For example, between 2001 and 2009, completions on small sites (1-9 dwellings net) represented 38% of total completions in Waverley, with an average of 102 completions on small sites each year;
- The current SHLAA has not identified any specific sites within settlements that are likely to deliver housing in years 11-15. However, it is unrealistic to suggest that no sites within settlements will come forward in that period.

Other Sources of Evidence

33 As part of the development of the LDF Core Strategy, a number of other evidence documents have been produced. Those of particular relevance to the housing options are:

- **The Draft Settlement Hierarchy**
- **The Strategic Housing Market Assessment (SHMA)**
- **The Employment Land Review (ELR)**

34 The Settlement Hierarchy places the settlements in Waverley in different categories based on the range of services available. The Hierarchy gives a measure of the sustainability of each settlement and provides valuable evidence that will support the assessment of where new housing should be directed. The latest version of the Draft Settlement Hierarchy is available to view as supporting evidence for this consultation.

35 The Council has also published a Strategic Housing Market Assessment (SHMA), which was commissioned jointly with Guildford and Woking Borough Councils, and an Employment Land Review (ELR). Both of these documents are available to view and download on the Council's web site.

36 The ELR considers both the current supply of employment land in Waverley and provides an assessment of likely demand for employment land over the plan period. A summary of the key findings from the SHMA, is attached as **Appendix 3**.

37 In addition to these, the Council is working on further evidence documents that will inform final choices about the preferred location of new housing, as follows:-

- **Strategic Flood Risk Assessment (SFRA)** - The Council already has information identifying the areas at highest risk from river flooding. However, the Council has also commissioned consultants to carry out a Strategic Flood Risk Assessment (SFRA), which will provide information on the risks of all forms of flooding. This document will influence final choices about broad locations and specific sites for future housing. It is currently anticipated that the SFRA will be completed in March 2010.
- **Transport Assessment** - Discussions are already taking place with Surrey County Council and the Highways Agency regarding the transportation implications of the Core Strategy and, in particular, the implications in terms of the location of housing. This is an iterative process in that it is not possible to properly assess the transportation issues without some quantitative indication of where housing will be located. The work on the Transport Assessment will continue during and beyond the Housing Options consultation and will clearly be a factor when the Council selects its preferred strategy for housing delivery.

Infrastructure Delivery

38 Another key consideration is infrastructure. Issues about infrastructure figure prominently in the responses received to date on the LDF. Given the emphasis on delivery, it is a requirement that the Core Strategy be accompanied by an Infrastructure Delivery Plan (IDP). This will identify the new/improved infrastructure that will be required to support the additional housing, together with the arrangements for delivery. This means working closely with the key infrastructure and service providers in the area, including the utility companies, transport providers and service providers such as the education authority and the Primary Care Trust (PCT).

39 There have already been a number of discussions with the key infrastructure and service providers. To date these have not thrown up any locational issues of such significance that they prevent specific housing options being considered. However, it became clear that until the housing options are quantified further, it is difficult for the service/infrastructure providers to provide more specific responses. The dialogue with these service providers will continue and this consultation on further housing options will be an opportunity to engage with these providers to obtain a clearer indication of the implications for current and future infrastructure provision arising from the options.

Feedback from Consultations to Date

40 As explained above, there have already been consultation events linked to this issue. In particular, the consultation on the Core Strategy Topic Papers, which took place in between February and April this year, gave the opportunity for the local community and other interested parties to comment on some choices relevant to the amount and location of housing. Attached as **Appendix 4** is a summary of the responses to the Topic Paper consultation that are relevant to the broad location of housing.

Factors affecting the Decisions about the Location of Housing

41 As indicated in PPS3, there are a number of factors that determine both the broad strategy for the location of housing as well as choices about specific sites. These include:

- Strategic designations like the Metropolitan Green Belt (MGB)
- National and international designations such as the AONB, SPAs, SACs
- Local landscape and townscape designations (such as conservation areas, special character areas, strategic gaps etc.)
- Physical constraints such as areas liable to flooding
- Local housing needs
- Access to services, public transport etc
- Climate change factors
- Existing land use (for example where development would result in loss of existing uses such as commercial land or land used for community facilities)
- The availability and capacity of existing infrastructure and the scope to improve or expand infrastructure to meet demands arising from new development.

Housing Options for Consideration

42 As previously explained, the common factor in all the identified options is that development within settlements will continue to make a significant contribution towards housing supply. This is as it should be, given the national and regional policies encouraging development on previously developed land and in the most accessible locations.

43 Given past completion rates, it is likely that the SHLAA underestimates the potential that exists within settlements. The fact that a new windfall site is not identified in the SHLAA does not mean that it is unacceptable. These unidentified sites will continue to come forward.

44 Phase 2 of the SHLAA sought to identify possible opportunities for development adjacent to the main settlements and the five largest villages. This exercise has identified sites for further consideration which, it is estimated, could deliver in the region of 4198

and 4280 dwellings, if all developed. This is well in excess of any potential shortfall and means that the Council will have to make choices about the best approach for meeting any shortfall.

45 In addition, there may be other greenfield sites that will emerge through the process and that could be as suitable or more suitable than sites identified in the current version of the SHLAA.

46 The response to this consultation will help the Council to decide broadly what approach should be taken to meeting any shortfall between what can reasonably be accommodated within the main settlements and the overall housing target

47 Before the Core Strategy is finalised, it will be necessary to further refine the options to develop a mechanism for weighing up the relative merits of possible sites and broad locations.

48 For example, how much weight should be given to the impact of the Thames Basin Heaths SPA? This affects development opportunities in most of Farnham. If it is proposed that a proportion of the housing requirement should be in Farnham, within the zone affected by the SPA, then it will be necessary to have an avoidance strategy, including the identification of Suitable Alternative Natural Greenspace (SANG) to deal with the impact of this new housing. However, there is also the option of considering whether the Waverley housing requirement could be met without the need to build house within the zone of influence of the SPA.

49 South East Plan Policy NRM6 deals specifically with the Thames Basin Heaths SPA. It indicates that priority should be given to directing development to those areas where potential adverse effects can be avoided without the need for mitigation measures. However, if this approach were taken it would have potentially significant implications for other parts of Waverley, given that Farnham has traditionally delivered about a third of the new homes built in the Borough. Consideration of such an approach would also need to be balanced against other factors and constraints influencing the location of development elsewhere in Waverley.

50 For example, there is the issue of the Green Belt. If the Council took the view that all existing Green Belt land should be safeguarded, then it would have the effect of preventing the release of new greenfield sites across much of Waverley.

51 Planning Policy Guidance Note (PPG)2 sets out the national policy on green belts. It makes it clear that the Green Belt boundary should only be altered in exceptional circumstances. Therefore, if the Council were seeking to alter the Green Belt boundary it would need to demonstrate that it had considered the opportunities for development within urban areas contained by the Green Belt and beyond the Green Belt. The main settlements in Waverley are affected by the Green Belt to different degrees. Godalming is surrounded by the Green Belt and the Green Belt abuts Haslemere for much of its northern and western side. Farnham lies largely beyond the Green Belt, as does Cranleigh.

52 PPG2 has specific advice concerning villages in the Green Belt. In Waverley, most of the villages are within the Green Belt. The main villages lying beyond the Green Belt are Dockenfield, Dunsfold, Alfold and Ewhurst. Currently, the villages within the Green Belt are “washed over” by the Green Belt rather than being excluded from it. PPG2 advises that if only very limited development in the form of infilling were proposed then the Green Belt can wash over the settlement. However, if development other than infilling, including limited expansion, were proposed then the village should be inset (i.e. excluded from the Green Belt). This will be a factor when considering the contribution of villages to meeting housing supply. For those villages outside the Green Belt, the current approach in Waverley is that these are washed over by the countryside notation rather than being specifically excluded from it. Local Plan policy RD1 identifies specific villages with a settlement boundary and allows for some limited development within these villages. Other smaller and loose-knit villages are subject to the general Green Belt/countryside policies.

53 Another factor will be accessibility to jobs services etc. As previously explained, the broad thrust of national and regional policy means that the focus should be on developing in the most accessible locations. On this basis, development in less accessible settlements is likely to be more limited.

54 A further factor will be the availability of infrastructure and, where needed, the scope to improve/expand infrastructure. This will be informed by the outcome of further consultation with key service and infrastructure providers.

How Many Homes to Plan For and When?

55 Before considering the options for where housing might go, it is necessary to consider how many houses to plan for. This question was asked in the consultation on the Core Strategy Topic Papers earlier this year. The majority of those who responded at that time were of the view that the Council should only plan for the 5,000 new homes.

56 What Waverley must do is to plan to deliver at least 5,000 new homes as required by the South East Plan. The South East Plan says that local authorities can, if they choose, test higher numbers through their LDFs, provided they are consistent with the principles of sustainable development set out in PPS1 and tested through sustainability appraisal and Habitats Regulations Assessment.

57 The arguments for planning for more than 5,000 new homes include the high level of identified need for affordable housing in Waverley and the demand for market housing. There is also the fact that the South East Plan will be subject to an early review to consider higher levels of house building across the South East.

58 On the other hand, it will be a challenge delivering the 5,000 new homes, given the shift in national policy away from windfalls and the implications for Waverley in terms of possible greenfield releases. Moreover, Waverley is not a sub-region or growth area within the South East Plan and is not seen as a focus for growth. Whilst it may be the

case that a revised South East Plan will require higher levels of housing, that is not the case now. Therefore, the Council's focus will be on the immediate task of delivering the 5,000 new homes required by the South East Plan.

Options for the Location of Development

Waverley Borough Council | Housing Options Technical Document

59 The options presented for comment have been derived from the relevant planning policy context; the previous consultations and the evidence base, particularly the SHLAA, draft Settlement Hierarchy and the Housing Market Assessment. Account has also been taken of the recent planning appeal decision in relation to the new settlement proposal at Dunsfold Park. To put the options in context, the current approach to housing provision is to focus on development within settlements, particularly the four main settlements. Some limited development is also allowed within the villages specifically covered by Local Plan Policy RD1. There is also a policy *Local Plan Policy H6) allowing for small scale schemes for affordable housing within or adjoining villages where a need has been identified.

60 In addition to setting out the strategy for housing delivery, the Core Strategy should also set out the role of the different settlements. This should include identifying what type of development, if any, will be allowable within settlements. In relation to the options below, where development is envisaged within/around villages, it is anticipated that the type and amount of development will have regard to the size and function of the settlement and the availability of infrastructure and services. It is also envisaged that whatever option is chosen there would still be a policy allowing for small scale affordable housing schemes to meet identified needs in the villages.

61 Each option assumes that a proportion of the required housing will be provided within the main settlements of Farnham (including Badshot Lea), Godalming, Haslemere and Cranleigh. Therefore, the options are all about where to locate the additional housing required to meet the South East Plan requirement.

62 The following five options have been identified for consultation:-

OPTION 1: Development within the main settlements of Farnham (including Badshot Lea), Godalming, Haslemere and Cranleigh, with any shortfall being met being met by selected releases of land around these settlements.

Advantages	Disadvantages
<ul style="list-style-type: none"> • Potentially the most sustainable option in terms of locating development where there is the best access to jobs, services etc. • Could be more deliverable as “available” sites have been put forward through the Strategic Housing Land Availability Assessment (SHLAA). • More flexible and easier to control the release of land, including phasing, compared to Options 4 or 5 	<ul style="list-style-type: none"> • Impact of new development more concentrated than in an option that distributes development more widely. • Less scope to meet the local market demand for private housing in the villages.

OPTION 1

Options for the Location of Development

Waverley Borough Council | Housing Options Technical Document

OPTION 2: Development within the main settlements of Farnham (including Badshot Lea), Godalming, Haslemere and Cranleigh, with any shortfall being met by selected releases of land around these settlements and within and potentially around Beacon Hill, Hindhead and the five largest villages of Bramley, Chiddingfold, Elstead, Milford and Witley.

Advantages	Disadvantages
<ul style="list-style-type: none"> • It could provide additional development to sustain and support the local services that exist in these large villages. • More scope to meet the local market demand for private housing in these larger villages compared with Options 1, 4 or 5. • Some potential "available" sites have been identified in the Strategic Housing Land Availability Assessment (SHLAA). • More flexible and easier to manage the release of land, including phasing, compared to Options 4 or 5. 	<ul style="list-style-type: none"> • Potentially less sustainable than Option 1 in terms of access to services, jobs etc. particularly for those villages without a rail link. • Potential impact on the Green Belt if the villages in question were identified for limited expansion. • Could have a negative impact on the delivery of affordable housing only schemes if landowners chose not to release sites on the edge of villages in the hope that they could sell or develop them for private housing. • Less scope to meet the local market demand for private housing in the smaller villages than with Option 3.

OPTION 2

OPTION 3: Development within the main settlements of Farnham (including Badshot Lea), Godalming, Haslemere and Cranleigh, with any shortfall being met by selected releases of land around these settlements and within and potentially around the villages generally.

Advantages	Disadvantages
<ul style="list-style-type: none"> • Impact of new development less concentrated. • More scope to meet the local market demand for private housing in the villages than with the other options. • Depending on scale/location of development, could assist in supporting the retention of local services. • More flexible and easier to manage the release of land, 	<ul style="list-style-type: none"> • Depending on the amount of development, this is potentially a less sustainable option than either Option 1 or Option 2 in terms of access to jobs, services etc. Even if it helps to support the limited local services, the need to travel to access other services increases. None of the additional villages in this option have rail access, so in terms of public transport they are more reliant on local bus services. • Could have a negative impact on the delivery of affordable housing only schemes if

Advantages	Disadvantages
including phasing, compared to Options 4 or 5.	<p>landowners chose not to release sites on the edge of villages in the hope that they could sell or develop them for private housing.</p> <ul style="list-style-type: none"> Depending on size/location, it may be more difficult to introduce new development in/around smaller settlements without impact on the countryside compared with development in/around larger settlements.

OPTION 3

OPTION 4: Development within the main settlements of Farnham (including Badshot Lea), Godalming, Haslemere and Cranleigh, with and any shortfall being met by a single urban extension to one of the main settlements.

Advantages	Disadvantages
<ul style="list-style-type: none"> The potential benefits arise principally from the scope to maximise economies of scale in terms of new infrastructure and services to support the development. There is also the opportunity to address climate change and sustainability issues on a larger scale by, for example, the use of renewable/low carbon technology. 	<ul style="list-style-type: none"> Potential impact of a single large development on an area's character and existing infrastructure. Could be difficult to identify a single location suitable for this amount of development. Makes management of housing supply more difficult because it is an “all or nothing” option. Less responsive to wider social and economic needs across the Borough than with Options 1-3.

OPTION 4

OPTION 5: Development within the main settlements of Farnham (including Badshot Lea), Godalming, Haslemere and Cranleigh, with any shortfall being met by a new freestanding settlement.

Advantages	Disadvantages
<ul style="list-style-type: none"> As with Option 4, the potential benefits arise principally from the scope to maximise economies of scale in terms of new infrastructure and services to support the development. There is also the 	<ul style="list-style-type: none"> Potential impact of a single large development on an area's character and existing infrastructure. The Dunsfold Park scheme failed on appeal due to the unsustainable location of the site in transport terms,

Advantages	Disadvantages
<p>opportunity to address climate change and sustainability issues on a larger scale by, for example, the use of renewable/low carbon technology.</p> <ul style="list-style-type: none"> In the planning appeal decision concerning the proposed new settlement at Dunsfold Park, the appeal inspector and the Secretary of State acknowledged that there were some advantages with that specific proposal, such as the low carbon lifestyle, the level of affordable housing proposed and the conclusion that the development would not materially harm the character and appearance of the countryside. 	<p>the impact of traffic on the local road network, and the conflict with planning policy arising from the siting of a major housing and industrial development in a rural area.</p> <ul style="list-style-type: none"> It may be difficult to identify a sustainable location for a new settlement in Waverley. If the objective were to avoid development of this scale in the Green Belt, then the options in terms of location are very limited. Makes management of housing supply more difficult because it is an “all or nothing” option. Less responsive to wider social and economic needs across the Borough than with Options 1-3.

OPTION 5

63 The consultation questionnaire provides the opportunity to indicate to the Council any other options or combination of options that could be considered.

Summary of Main Issues in Planning Policy Statement (PPS) 3 Regarding the Location of New Housing **Appendix 1**

Waverley Borough Council | Housing Options Technical Document

Appendix 1 Summary of Main Issues in Planning Policy Statement (PPS) Regarding the Location of New Housing

1.1 PPS3 was published in November 2006 and represents a step-change in the way that local authorities plan for the delivery of housing. Local authorities are expected to be much more pro-active in identifying deliverable sites for housing. This has major implications for areas like Waverley where, in the past, housing targets have been met by the continued emergence of windfall sites (i.e. sites that the Council has not previously identified and allocated for housing).

1.2 PPS3 expects the planning system to deliver:

- High quality, well-designed housing
- A mix of housing, both market and affordable, to support a wide variety of households
- A sufficient quantity of housing
- Housing development in suitable locations, which offer a good range of community facilities and with good access to jobs, key services and infrastructure
- A flexible and responsive supply of land that makes efficient use of land, including the re-use of previously developed land where appropriate.

In terms of the location of housing, local authorities should set out criteria to be used in identifying broad locations and specific sites, taking account of:

- The spatial vision for the local area
- Evidence of current and future levels of need and demand, as well as the availability of suitable sites and viable sites
- The contribution to be made to cutting carbon emissions by focusing development in locations with good transport accessibility by means other than the car and where it can readily and viably draw its energy supply from decentralised systems based on renewable and low-carbon technology
- Any physical, environmental, land ownership, land use, investment constraints or risks
- The options for accommodating new housing growth (examples include re-use of vacant and derelict sites or industrial and commercial land; mixed-use town centre development; additional housing in existing residential areas, expansion of settlements through urban extensions; and creation of new settlements.
- Accessibility to existing local community facilities, infrastructure and services, including public transport. The location of housing should facilitate the creation of communities of sufficient size and mix to justify the development of and sustain community facilities, infrastructure and services.
- The need for housing in rural areas, including villages, in order to enhance or maintain their sustainability
- The need to develop mixed, sustainable communities across the wider local authority area as well as at neighbourhood level.

1.3 One of the key objectives of PPS3 is to make effective use of land, by re-using previously developed land (PDL). The national target is that at least 60% of new housing should be on PDL. It is expected that there is also a regional target for development of PDL and that the LDF should have a PDL target and trajectory.

1.4 PPS3 is also concerned with the efficient use of land. Local authorities can set local density policies, but until these are in place, the national indicative minimum density is 30 dph. PPS3 sets out a number of factors to consider where a local authority wants to plan for or agree to densities below 30 dph.

1.5 In terms of land supply, the Government's objective is to ensure that the planning system delivers a flexible, responsive supply of land. Having regard to the principles of Plan, Monitor, Manage, local authorities are expected to develop policies and strategies to ensure that sufficient, suitable land is available to achieve their housing and PDL delivery objectives. For Waverley, this means setting out in the LDF the strategy for delivering the required housing, including identifying broad locations and specific sites, to enable a continuous delivery of housing for at least 15 years from adoption (i.e. until 2026).

1.6 Local authorities should identify enough specific **deliverable** sites to deliver housing for 5 years. (**Deliverable** means the site must be **available, suitable and achievable**).

1.7 Local authorities should also identify a further supply of specific **developable** sites for years 6-10 and, where possible, years 11-15. ("Developable" sites should be in a suitable location for housing and with a reasonable prospect of being available to be developed at the point envisaged.) Where it is not possible to identify specific sites for years 11-15, then broad locations for future growth should be indicated.

1.8 Existing planning permissions can be included, but only where the local authority can demonstrate that the sites are developable and likely to contribute to housing delivery at the point expected.

1.9 With regard to windfall sites, PPS3 states that these should not be included in the first 10 years of land supply, unless the local authority can provide robust evidence of genuine local circumstances that prevent specific sites being identified.

Summary of the Main Issues in the South East Plan (2009) Regarding the Location of New Housing **Appendix 2**

Waverley Borough Council | Housing Options Technical Document

2.1 Clearly the South East Plan policies of particular relevance are those relating specifically to housing delivery (policies H1 and H2). Policy H1 deals with the regional allocation of housing numbers, including Waverley's 250 per annum. Policy H2 deals with the management of the delivery of housing in the region. This policy identifies a number of factors that need to be considered when planning for the delivery of new housing. One of these identifies the need to address any backlog of unmet housing needs within the first 10 years of the plan.

2.2 There are also many other policies in the South East Plan that will have a bearing on decisions made about where housing should go. These include cross-cutting policies on issues such as infrastructure and climate change, policies relating to employment, built environment policies and policies on natural resource management, including the specific policy relating to the Thames Basin Heaths SPA.

2.3 In the chapter setting out the Spatial Strategy for the region, Policy SP3 relates to urban focus and urban renaissance. It states that the prime focus for development in the south east should be urban areas, in order to foster accessibility to employment, housing, retail and other services, and avoid unnecessary travel. It states that local authorities should formulate policies to concentrate development within or adjacent to the region's urban areas. It also has a target of at least 60% of new development being on PDL.

2.4 In the section relating to supporting rural communities, it states that although policies in the Plan seek to focus new development into and around existing larger settlements, there remains a need to recognise that local authorities should consider the need to plan for some new development outside these areas to support rural communities and services.

2.5 Policy H5 deals with housing design and density. It states that in conjunction with the delivery of high quality design and to make best use of available land and encourage more sustainable patterns of development, higher housing densities will be encouraged, with an overall regional target of 40 dwellings per hectare over the plan period. Local authorities are expected to reflect this target with appropriate local variations in their LDFs. Alongside this is Policy H6, which encourages making better use of existing housing stock, for example, through encouraging conversion of larger houses into flats in appropriate locations and where this is consistent with meeting local housing needs.

2.6 The chapter on management of the built environment also contains a number of policies that have some relevance to the issue of where and how to locate housing. These are:

- Policy BE1 – Management for an Urban Renaissance
- Policy BE2 – Suburban intensification
- Policy BE3 – Suburban Renewal
- Policy BE4 – The Role of Small Rural Towns ('Market Towns')
- Policy BE5 – Village Management

2.7 With regard to Policy BE2, the supporting text acknowledges the pressure for new development that is faced in many suburban areas. It states that at present much of the infill and intensification in these areas is viewed in a negative way and dealt with on an incremental and piecemeal basis, placing undue pressure on local infrastructure and services. The plan states that there is a need for a positive and planned approach to intensification, with clear guidance set out in local development documents and/or supplementary planning documents, based upon neighbourhood assessments of character and capacity. There is also the opportunity for LDFs to seek to identify neighbourhoods that may present development opportunities.

Main Issues Arising from the Strategic Housing Market Assessment **Appendix 3**

Waverley Borough Council | Housing Options Technical Document

Strategic Housing Market Assessment (SHMA)

3.1 This was commissioned jointly with Guildford BC and Woking BC and published in February. It considers both the need for subsidised affordable housing and likely demand for market housing. It also provides information on the needs of specific groups such as students, older people and households with special needs.

3.2 In terms of national policy, the key outputs expected from an SHMA are:-

- The likely proportion of households that require market or affordable housing (i.e. x% market housing and y% affordable housing);
- The likely profile of household types requiring market housing eg multi-person, including families with children (x%), single person (y%), couples (z%); and
- The size and type of affordable housing required.

3.3 In terms of subsidised affordable housing, the SHMA identifies a net annual need of 515 dwellings. The recommended proportion of the total housing supply that should be affordable is 40%.

3.4 In terms of social rented housing, the main need is for one and two bedroom units. In terms of other forms of subsidised affordable housing (such as shared ownership housing) the greatest need is for two and three bed units.

3.5 With regard to market housing, the expectation is that the SHMA will consider the profile of households requiring housing rather than seeking to identify a specific percentage of one-bed, two-bed etc. Based on the Household Survey that was carried out as part of the SHMA, the profile of household types requiring market housing is:-

Household Type	Proportion
Single pensioner	7.4%
2+ pensioners	6.1%
Single non- pensioner	12.7%
Childless couple	35.6%
Other multi-adult	7.8%
Lone parent	2.4%
2+ adults and 1 child	15.5%
2+ adults, 2 + children	12.4%

Household Survey Results (SHMA)

Summary of Responses to the Core Strategy Topic Paper Consultation Relating to the Location of New Housing **Appendix 4**

Waverley Borough Council | Housing Options Technical Document

Appendix 4 Summary of Responses to the Core Strategy Topic Paper Consultation Relating to the Location of New Housing

Introduction

The issue of the amount and location of new housing was considered as part of the consultation on the Topic Papers for the Core Strategy, which took place between February and April 2009. The Town and Country Topic Paper included questions regarding:

- TC1: How many new homes should we plan for?
- TC2: Where should new homes be built?
- TC3: Should the Council include an allowance for “windfall sites” in its overall housing strategy?
- TC4: In principle, should the Council seek to control the amount of unplanned housing that comes forward?

Responses to the Consultation

Comments were made by individuals and organisations (that include the CPRE, amenity groups and residents’ associations) and developers/agents/landowners. In terms of specific consultees, those responding included: SEERA, SEEDA, Environment Agency, Natural England, English Heritage, Surrey County Council, Southern Water, Thames Water and the Highways Agency.

In total there were 149 respondents to the Topic Paper consultation. Responses mainly came in the form of choosing set answers to specific questions set out in the Council’s questionnaires on the Topic Papers. However, some respondents also chose to set out written comments to the Topic Papers in addition to or instead of the set answers given in the questionnaires.

Whilst the feedback from the consultation is valuable, the statistical analysis of the consultation responses to the questionnaires and the written comments needs to be put in context. Taking account of the overall number of responses and that the responses came from a mix of individuals and organisations, they do not comprise a wholly representative cross-section of the population or the other organisations and individuals who have an interest in Waverley.

The responses and written comments to the above questions include responses to the Council’s Topic Paper on the Draft Spatial Portrait, Spatial Vision, Core Objectives and Strategy Issues where it was considered that they have implications for the strategy for developing new housing. Summaries of the comments are set out below.

Issue TC1 - How many new homes should we plan for?

On the question of how many homes to plan for, there were 100 respondents, comprising developers, organisations and individuals. 69% of respondents felt that the Council should be planning to deliver only the 5,000 homes rather than more, with 31% favouring the option of actively planning to deliver more than 5000 new homes.

Specific written comments on this issue were also split between the two options. On the one hand there were comments that the figure of 5,000 is significantly above that which the draft South East Plan thought sustainable. Waverley is a rural borough that is not designated for growth in the South East Plan. It is covered in places by constraints including the Surrey Hills AONB, Green Belt and SPA, SAC. Therefore, it will be difficult not have an impact on the environment and infrastructure if it is to meet the 5000 as a minimum figure. It was pointed out that the South East Plan encourages local authorities to consider higher allocations, rather than 'does not prevent' as stated in the Topic Paper – the comment being that the emphasis in the Topic Paper was wrong.

On the other hand it was argued that the housing target in South East Plan is a minimum target as it is not a matter of just meeting housing numbers. The Council must aim to meet housing need as it is desperately needed to meet general affordable housing needs as well meeting the needs of specific groups, such as the elderly and students. This may mean allocating sites solely or mainly for affordable housing. Household projections, housing growth aspirations and current economic conditions could also mean planning for more than 5,000 homes and looking beyond 2026. A point also raised was that the Council should not only plan for but also commit itself to the delivery of 5,000 new homes.

Some of the comments made it clear that the evidence base will inform the Council whether they should plan for more houses than that required in the South East Plan and whether the numbers are deliverable. Environmental issues such as the provision of infrastructure such as drainage, sewage, and flood risk management also need to be considered.

Issue TC2 - Where should new homes be built?

There was a mixed response on the options about where development should be located. The following sets out the results from the questionnaires and some of the comments relating to where housing should go.

Option TC2A: Development within towns and villages. Effectively a continuation of the Council's current policy and would limit most new housing development to locations within the current settlement boundaries in the Local Plan. These comprise Farnham, Godalming, Haslemere and Cranleigh and all the villages identified under RD1.

22% of respondents to the questionnaires preferred the option of containing development to sites within settlements.

It was considered by some respondents that this approach would be the most sustainable location for new development with best access to infrastructure, services, transport and employment, in line with the South East Plan and the Regional Economic Strategy. The Core Strategy should make better use of urban housing stock to promote urban

Appendix 4 Summary of Responses to the Core Strategy Topic Paper Consultation Relating to the Location of New Housing

renaissance. Developing within the towns and villages should be used to create locally distinctive places. Affordable housing is best delivered within existing settlements where services and facilities are available.

In the opinion of some, development outside settlements will have a negative impact on the environment and the open countryside. It could lead to urban sprawl; it would be less sustainable and would render settlement boundaries meaningless.

It was suggested that the identification of sites in the main towns should be based on a sequential approach with town centre sites considered first, followed by edge of centre sites and out of centre sites. For others, previously developed sites should be considered first. However, it was suggested that the location of development on brownfield sites within settlements would also need to take into account biodiversity and environmental interests.

There was the comment that the evidence base would inform the selection process for choosing sites. Development on brownfield sites could also have implications for flooding given that town centres are usually based around rivers, and pollution. The opportunity should be taken to undertake remediation measures.

Option TC2B: Development within towns and villages together with some of the required new housing provided on identified sites on the edge of the towns and larger villages

The option of having development within towns and villages, together with some new housing being on identified sites on the edge of the towns and larger villages, received the highest response (33% of the 81 respondents)

This option was considered preferable by some respondents because, like Option TC2A, it was sustainable in directing development to where access to facilities, services, transport and infrastructure is the greatest.

Such an approach, it was argued, should sequentially consider brownfield sites on the edge or close to the towns and larger villages first. However there was also a view that relying just on brownfield land would undermine an approach that seeks to meet housing needs and balances housing and employment growth.

It was commented that undertaking green field releases and smaller scale local reviews of Green Belt boundaries is acceptable under the South East Plan. If development takes place on green field sites then certain mitigations in relation to biodiversity and conservation should be undertaken.

Option TC2C: Development within Towns and Villages, with some of the required new housing being provide on the edge of towns and villages generally irrespective of their size

The option of locating development within towns and villages, with some new development on the edge of towns and villages generally was favoured by 12% of respondents to the questionnaires.

The written comments show there is support for development in rural areas because it will increase the sustainability of village schools and other education facilities as well as meeting local housing needs. It was also considered that a pragmatic view should be taken about the reliance on private cars in rural areas. A balance must be struck to avoid refusing very worthy applications purely on the grounds that they fail to meet unrealistic sustainable transport aspirations.

This approach was also attractive to some respondents because they felt that development within the towns and villages and outside the larger towns and larger villages would overload these settlements. However, spreading development to the edge of towns and villages irrespective of size must be on carefully selected sites.

Option TC2D:Development within towns and villages, together with some of the required new housing being provided in a new settlement or a single urban extension.

The option of having development within the towns and villages, together with some new housing being provided in a new settlement or a single major urban extension was the second highest favoured option with 32% of respondents to the questionnaire preferring it.

Written comments include one that stated that any urban extensions should be limited to the four main settlements. Extensions to other settlements should be limited to “exception” sites solely for affordable housing to meet local needs.

One view was that any attempt to build a large urban extension would seriously undermine the existing character of the Borough. Another was that a single large extension would not be able to respond to the wider social and economic needs of the borough and towns, as it would leave other towns and the larger villages with little scope to meet their needs. It would result in a substantially larger single centre and place considerable pressure on the infrastructure of a single settlement.

There was a mixed opinion on a new settlement. On the one hand it was considered that the location of development is incorrectly being driven by the proposed settlement hierarchy that relies entirely on the current pattern of accessibility to services, jobs and

Appendix 4 Summary of Responses to the Core Strategy Topic Paper Consultation Relating to the Location of New Housing

public transport and not on other aspects of reducing climate change. The provision of a new settlement could achieve this. However, it is important to be clear about where the location of a new settlement should be otherwise this option would be meaningless. It is also not clear whether the other options are realistic in achieving the amount of development needed and what impact they would have on issues such as congestion, infrastructure and environmental and planning constraints.

Other respondents took a different view commenting that it is unlikely that there will be a suitable location for a single new settlement in Waverley, as confirmed by the South East Plan (Proposed Changes). A new settlement will not be able to meet the employment, shops and service needs of the new community compared to existing or new provision in an existing settlement. New homes and the provision of new facilities/service in a new settlement could be detrimental to the viability of existing settlements.

General considerations for the location of development

Written comments also included a number of issues that the Council need to consider when deciding where major housing development should take place. These include protecting landscapes, habitats, sites, species and floodplains and promote sustainable transport patterns. Development should deliver significant benefits for natural environment including climate change mitigation and adaptation measures as well as provision for access and recreation and minimise impact on neighbouring uses.

It is important to identify the very different characteristics of each of the Borough's settlements including parking/traffic issues. Development should fit sensitively into its surroundings, and where "low density" areas are designated in the Local Plan these should be retained. Development should create high quality locally distinctive places.

The economic situation also needs to be taken into account. Locations will need to consider the implication of the financial downturn on the housing market and development viability.

Where development is needed inside settlements then this could be achieved by moving under utilised recreational space and allotments that are presently located inside settlements to undeveloped land outside settlements. The land inside settlements left vacant could then be developed. Such land swaps would allow the Council to achieve improvements in recreational and other facilities without prejudicing existing planning policies.

Other issues raised include taking into account cross boundary issues, such as the impact of developing Whitehill/Bordon in East Hampshire and its impact on the Waverley's infrastructure and facilities.

Development should help deliver a balance of housing and employment in the most sustainable locations to meet housing needs and help provide appropriate accommodation for existing and new businesses.

In general terms it was pointed out that it is quicker to deliver infrastructure on a small number of clearly defined large sites than it is to deliver on a large number of small sites that may not be clearly defined.

There was concern about the Council's approach regarding the Thames Basin Heaths SPA. The view was expressed that the Council and Government have promoted unlimited development around the SPA without the required Waddenzee 'convincing evidence' for justification. The comment was also made that the Core Strategy cannot predetermine the review of the mini-plan and that the draft South East Plan states an acceptance that development in Waverley can be accommodated outside the Thames Basin Heaths SPA Zone of Influence.

It was also commented that the Core Strategy does not mention any potential Major Developed Sites within the Green Belt. The Core Strategy cannot be delivered without their consideration. Major Developed Sites have particular significance and should not be placed by omission in the category of a windfall site.

Specific Areas for Development

Responses by landowners/developers promoted a number of different sites and settlements across the Borough where housing should go for a number of reasons. Similarly a number of areas and settlements have been suggested where development should not take place because of constraints.

Issue TC3 - Should the Council include an allowance for windfall sites in its overall housing strategy?

The view on allowing windfalls was mixed, with 51% of the 79 respondents to the questionnaires saying that there should be no allowance for windfalls in the first 10 years of the strategy and 49% taking the opposite view.

There was a clear view from some that there is no evidence to support windfalls and therefore should not be included in the first ten years of the Core Strategy.

Some respondents' case against windfalls was that they do not provide certainty and it will be difficult for infrastructure and service providers to plan investment. In terms of flooding, windfalls will not allow for sites to be identified and cannot be sequentially tested through the Strategic Flood Risk Assessment. It also places pressure on lower value land values and the consequent loss of other uses to other uses.

Another reason for not having a windfall allowance is that they can involve the subdivision of existing dwelling houses and their gardens. This has a detrimental impact on the character of the area that the site lies within, wildlife, and can result in run off and flooding caused by an increase in the built form. For some, windfalls should only be used to exceed the minimum housing targets set out in the South East Plan

Appendix 4 Summary of Responses to the Core Strategy Topic Paper Consultation Relating to the Location of New Housing

On the other hand, some respondents felt that Waverley could justify a windfall allowance. It is a rural Borough. Historically this is the process that has delivered the greater proportion of new housing in the Borough and there is no reason why this would not continue. Without windfalls there will be pressure to deliver housing sites on green field sites.

Some respondents felt that windfalls could support wider development and housing goals to meet housing needs and help form part of the five year housing supply.

One respondent also linked the issue of windfalls to the SPA issue in Farnham. The comment was that there should not be an allowance for windfalls in the first ten years. If Waverley cannot identify specific sites in Farnham for the first ten years then there is no need for a mini plan.

Issue TC4 – In principle should the Council seek to control the amount of unplanned housing that comes forward?

There was a mix of views on this issue. In terms of answers to the questionnaires, 68% of the 75 respondents favoured the option of having a policy to control the release of unplanned windfall sites in circumstances where it could be demonstrated that the required amount of housing can be delivered without reliance on these sites.

The other 32% responses to the questionnaires favoured the option of not having a policy to control the release of windfall sites. Respondents felt that the approach should not stop windfall sites that are appropriate for development.

Question TC5- What types of windfall development should the Council seek to control and why?

In response to the supplementary question in the questionnaire and written comments the following are the types of windfall sites that respondents have suggested should be controlled.

Development that:

- Results in the subdivision of garden land as it ruins the character of an area (the most frequent comment). Gardens are important not only for environmental reasons but also because it has a detrimental impact on the local character of communities.
- Results in overcrowding and pressure on the road system and infrastructure.
- Detrimentally affects protected low-density areas. The density should not be increased by infilling.
- Tries to avoid a mix of housing.
- Does not give 'certainty' to the public and developers. Windfalls are not a plan.
- Is poorly designed and eco unfriendly.
- Does not allow infrastructure providers to plan investment.
- Results in the loss of land or buildings that are valuable to the community.
- Reduces the provision of affordable housing.

- Does not support the housing strategy.
- Is in the floodplain and in areas that have drainage restrictions.
- That allows for protection of infrastructure, which includes foul and surface water sewers.
- Complies with a phasing of development strategy.
- Is not appropriate for the size of the settlement it is linked to and its existing infrastructure and facilities.

Tandridge District Council has a policy where windfalls of over 5 units or above (or 0.2 ha) are controlled where the Council's rolling 5-year housing supply figure is exceeded by more than 20%. Some respondents felt that Waverley could have a similar approach.

One comment stated that there should not be an assumption that all windfall sites automatically are entitled to development.

Waverley Borough Council | Housing Options Technical Document