

Elstead and Weyburn Neighbourhood Plan

Site Selection and Boundary Changes

February 2020

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1.0 Introduction

1.1 This Site Selection and Boundary Changes report outlines the decision-making process undertaken by the Elstead and Weyburn Neighbourhood Plan Working Group (“the Working Group”) as part of the preparation of the Neighbourhood Plan. The structure of the report is broadly:

Section 2: Site Selection Overview

Section 3: Boundary Changes Overview.

2.0 Site Selection Overview

2.1 A site assessment process has been undertaken by the Working Group as part of the preparation of the Neighbourhood Plan. A key purpose of undertaking the site assessment process was to assist the Working Group in considering the potential sites in a structured and detailed way. It has been an iterative process and the findings at each stage have made an important contribution to the plan-making process.

2.2 To date, a total of ten sites have been identified and considered as part of the site assessment process, these being:

Site 1: Milford Road

Site 2: Land at Four Trees

Site 3: The Croft

Site 4: Land off West Hill and Crest Hill

Site 5: Sunray Farm

Site 6: Bargate House

Site 7: Church Farm and West Brook Cottages

Site 8: Land east of Red House Lane

Site 9: Land at Red House Farm

Site 10: Land at Kingsmede Elstead Park.

2.3 A plan showing the location of the 10 sites is included as Appendix 1.

2.4 In addition to the Strategic Environmental Assessment (SEA) and the Habitat Regulations Assessment (HRA) processes, which has also informed site selection decision-making, the site assessment process has comprised three broad elements:

Element 1: Waverley Local Plan Part 1 and the emerging Local Plan Part 2

Element 2: AECOM Site Assessment

Element 3: Supporting a Walkable Neighbourhood.

Element 1: Waverley Local Plan

2.5 In 2017, the Waverley Local Plan Part 1 (WLPP1) identified the land associated with Site 2: Land at Four Trees and Site 3: The Croft as 'Broad areas for potential adjustment to Green Belt boundary'. In 2018, the emerging Waverley Local Plan Part 2 (WLPP2) proposed Sites 2, 3 and 5 (Sunray Farm) to be allocated for residential development:

Site 2 (Site DS25): estimated 20 dwellings

Site 3: (Site DS23) – estimated 35 dwellings

Site 5: (Site DS24) – estimated 12 dwellings.

2.6 As part of the WLPP2 process, Elstead Parish Council submitted representations to Waverley Borough Council (WBC). A copy of the representations are included as Appendix 2. The representations did not object to the principle of development on the three proposed sites, or the overall number of homes to be delivered within the Neighbourhood Plan area over the period up to 2032. However, soundness concerns were submitted relating to the number of estimated homes proposed on each site. The Parish Council's principal concerns were:

- a) By locating the bulk of new development at 2 remote and less sustainable sites, in preference to a more accessible site closer to village services and facilities, they do not meet the test of sustainability;
- b) They do not give priority to previously developed land;
- c) They do not reflect local policies and plans.

Element 2: AECOM Site Assessment

- 2.7 In 2017, the Woking Group appointed AECOM to undertake a site assessment process to provide an independent assessment of the potential housing sites. The AECOM process assessed the sites using a standard Strategic Housing and Economic Land Availability Assessment (SHELAA) style methodology, taken from the Government’s Planning Practice Guidance (PPG).
- 2.8 The AECOM Site Assessment (2017) is available of the Elstead Parish Council website (<https://elsteadvillage.co.uk/neighbourhood-plan/>) and a summary of the assessment outcome for each of the assessed sites is set out below:

Site		Site Assessment Summary
2	Land at Four Trees	This site has been assessed as suitable and available for development in the 2016 LAA. It would therefore be an appropriate site to be allocated for housing in the Neighbourhood Plan. If this site is selected for proposed allocation by the Neighbourhood Plan Steering Group, and accepted by Waverley Borough Council, the Neighbourhood Plan proposal would be implemented through a Green Belt boundary change which would form part of the Local Plan Part 2. This Green Belt amendment would need to be formally adopted by Waverley Borough Council prior to the Neighbourhood Plan’s independent examination otherwise the Neighbourhood Plan would fail to comply with national and strategic local policy.
3	Land to the rear of the Croft	This site has been assessed as suitable and available for development in the 2016 LAA. It would therefore be an appropriate site to be allocated for housing in the Neighbourhood Plan. If this site is selected for proposed allocation by the Neighbourhood Plan, and accepted by Waverley Borough Council, the Neighbourhood Plan proposal would be implemented through a Green Belt boundary change which would form part of the Local Plan Part 2. This Green Belt amendment would need to be formally adopted by Waverley Borough Council prior to the Neighbourhood Plan’s independent examination otherwise the Neighbourhood Plan would fail to comply with national and strategic local policy.
1	Milford Road	The site is considered suitable for allocation but does have some significant constraints. The site is on the eastern edge of Elstead and opposite existing residential properties located along Milford Road. The site is well screened by existing mature/dense vegetation but views are possible immediately to the north. However, it is considered long distance views from Surrey Hills AONB and AGLV are extremely limited. Any adverse impact could be mitigated through planting of trees/hedges along the northern and eastern boundaries of the site.

Site	Site Assessment Summary		
		<p>Access to the site could be made from Milford Road via an existing access but would need to be carefully designed so that the necessary standards regarding visibility splays can be met.</p> <p>The suitability of the site would still be subject to the land being removed from the Green Belt. The site lies within a SSSI (Site of Special Scientific Interest) Impact Risk Zone and the 400m Zone of Influence around the Wealden Heaths Phase 1 SPA). Proposals for residential development will need to demonstrate that there would not be a significant adverse effect on the SPA. The impact of proposals will be considered on a case-by-case basis. Where necessary, a project specific Habitats Regulations Assessment will be required. However, as the site is located within the 400m Zone of Influence (which does not mean that development cannot take place) priority should be given to alternative sites further from the SPA.</p> <p>If this site is selected for proposed allocation by the Neighbourhood Plan Steering Group, and accepted by Waverley Borough Council, the Neighbourhood Plan proposal would be implemented through a Green Belt boundary change which would form part of the Local Plan Part 2. This Green Belt amendment would need to be formally adopted by Waverley Borough Council prior to the Neighbourhood Plan's independent examination otherwise the Neighbourhood Plan would fail to comply with national and strategic local policy.</p>	
4	Land off West Hill and Hill Crest	<p>The site is not considered suitable for allocation. The site is located on a plateau within the centre of Elstead and would be highly visible from the village as well as the wider Surrey Hills AONB and AGLV. The site is also located adjacent to a Grade II listed building and the Elstead Conservation Area and it is likely that a development of this scale would have a significant adverse impact on these assets. The site contains two footpaths which provide a tranquil route between the east and west parts of the village. The redevelopment of the site would adversely affect the amenity value of the footpaths. Traffic impacts could be adverse on Hill Crest and West Hill which are currently quiet cul-de-sacs as they would see a noticeable increase in vehicle movements.</p> <p>The site also contains one Tree Preservation Group (WA57) which could be lost as a result of the redevelopment of the site. However, this could be mitigated through careful design.</p>	
5	Sunray Farm, West Hill	<p>The site is considered suitable for allocation but does have some significant constraints. The site is located on the edge of the western inner side of Elstead immediately adjacent to existing residential properties and within walking distance of a number of local services including the local primary school. The site is a mixture of fields, hardstanding and buildings and therefore, some parts of it can be considered previously developed land. The development of the site would result in the redevelopment of a number of derelict buildings which would bring the site back into a positive use, improving the amenity of the area. The western part of the site is flat but the levels of the site do rise to the east. This topography, coupled with the</p>	

Site	Site Assessment Summary	
	<p>residential properties to the west and dense mature vegetation to the north and south screens the site from views in the wider Surrey Hills AONB and AGLV. There are some gaps within the vegetation to the east but further planting along this boundary would aid in containing the development and minimising its impact on the AONB/AGLV.</p> <p>Any adverse landscape impacts could be further mitigated through restricting development to the western part of the site which is currently brownfield, on lower land and screened well by existing vegetation and residential properties.</p> <p>Land within the western part of the site could be left as open space. The suitability of the site would still be subject to the land being removed from the Green Belt. The site lies within a SSSI Impact Risk Zone, 5km Zone of Influence around the Wealden Heaths Phase 2 Special Protection Area and the 1km Zone of Influence around the Wealden Heaths Phase 1 Special Protection Area. Proposals for residential development must demonstrate that there would not be a significant adverse effect on the SPA. The impact of proposals will be considered on a case-by-case basis. Where necessary, a project specific Habitats Regulations Assessment will be required.</p> <p>If this site is selected for proposed allocation by the Neighbourhood Plan Steering Group, and accepted by Waverley Borough Council, the Neighbourhood Plan proposal would be implemented through a Green Belt boundary change which would form part of the Local Plan Part 2. This Green Belt amendment would need to be formally adopted by Waverley Borough Council prior to the Neighbourhood Plan's independent examination otherwise the Neighbourhood Plan would fail to comply with national and strategic local policy.</p>	
6	<p>Bargate House</p> <p>The site is considered suitable for allocation but does have some significant constraints. The site forms part of the gardens at Bargate House and is completely screened from public view by mature/dense vegetation, Bargate House and additional residential properties to the southwest. The site is not visible from the wider Surrey Hills AONB or AGLV and therefore the redevelopment of the site would have a negligible impact on the AONB and AGLV.</p> <p>The site is located within the Westbrook Green Conservation Area and within close proximity to a number of listed buildings. However, it is considered that a design sensitive to these historic assets is achievable. The indicative capacity is based on 30-50 dwellings per hectare but it is likely that due to the setting the number of homes on this site that would be supported by WBC would be lower (e.g. 12 as a maximum) The site is located immediately adjacent to a Site of Nature Conservation Importance and therefore measures will be required to ensure the special qualities of the area are not adversely affected as a result of the redevelopment.</p>	

Site	Site Assessment Summary	
	<p>The suitability of the site would still be subject to the land being removed from the Green Belt. The site lies within a SSSI Impact Risk Zone, 5km Zone of Influence around the Wealden Heaths 2 Special Protection Area and the 1km Zone of Influence around the Wealden Heaths Phase 1 Special Protection Area. Proposals for residential development must demonstrate that there would not be a significant adverse effect on the SPA.</p> <p>The impact of proposals will be considered on a case-by-case basis. Where necessary, a project specific Habitats Regulations Assessment will be required.</p> <p>If this site is selected for proposed allocation by the Neighbourhood Plan Steering Group, and accepted by Waverley Borough Council, the Neighbourhood Plan proposal would be implemented through a Green Belt boundary change which would form part of the Local Plan Part 2. This Green Belt amendment would need to be formally adopted by Waverley Borough Council prior to the Neighbourhood Plan's independent examination otherwise the Neighbourhood Plan would fail to comply with national and strategic local policy.</p>	
7	<p>Church Farm and West Brook Cottages</p> <p>The site is considered unlikely to be suitable for allocation.</p> <p>The site is located within the Westbrook Green Conservation Area and immediately adjacent to one Grade II*, two grade II listed buildings and one Site of Archaeological Interest. It is considered likely that the redevelopment of the site for housing would erode the existing setting of the Grade II* listed building which currently enjoys a spacious, rural setting. However, sensitive design, including limiting the amount of built development within close proximity to the listed building, could result in an acceptable scheme.</p> <p>The site is well screened by dense/mature vegetation to the south and residential properties to the north, east and west. As such, the site is not visible from the wider AONB/AGLV. The suitability of the site would still be subject to the land being removed from the Green Belt. The site lies within a SSSI Impact Risk Zone, 5km Zone of Influence around the Wealden Heaths Phase 2 Special Protection Area and the 1km Zone of Influence around the Wealden Heaths Phase 1 Special Protection Area. Proposals for residential development must demonstrate that there would not be a significant adverse effect on the SPA. The impact of proposals will be considered on a case-by-case basis. Where necessary, a project specific Habitats Regulations Assessment will be required.</p> <p>If this site is selected for proposed allocation by the Neighbourhood Plan Steering Group, and accepted by Waverley Borough Council, the Neighbourhood Plan proposal would be implemented through a Green Belt boundary change which would form part of the Local Plan Part 2. This Green Belt amendment would need to be formally adopted by Waverley Borough Council prior to the Neighbourhood Plan's independent examination</p>	

	Site	Site Assessment Summary	
		<p>otherwise the Neighbourhood Plan would fail to comply with national and strategic local policy.</p>	
8	Land east of Red House Lane	<p>The site is considered suitable for allocation but does have some significant constraints. The site includes land to the rear of properties along Red House Lane and this type of 'back garden' development would be out of character in this part of Elstead which is predominantly linear. Any development would be screened by residential properties and existing mature/dense vegetation. However, there are gaps in the vegetation to the west and south which do offer views of the site from the wider Surrey Hills AONB and AGLV. However, the planting of screening vegetation along these boundaries would ensure that the redevelopment of the site would have a limited impact on the AONB and AGLV.</p> <p>A Phase 1 Ecology Survey (24 July 2017) has been undertaken on behalf of the landowner by Bright Green Environmental. In summary, following the implementation of avoidance/ precautionary, mitigation and enhancement measures the redevelopment of the site would not have an impact on the site's biodiversity. An Arboricultural Impact Assessment has been undertaken on behalf of the landowner by Bright Green Environmental and has identified that following the assessment of a preliminary design two category B trees and five category C trees would need to be removed to make way for development. The impact of this is considered low as all high quality trees would be retained.</p> <p>The suitability of the site would still be subject to the land being removed from the Green Belt. The site lies within a SSSI Impact Risk Zone, the 400m Zone of Influence around the Wealden Heaths Phase 1 SPA and 5km Zone of Influence around the Wealden Heaths Phase 2 Special Protection Area. Proposals for residential development must demonstrate that there would not be a significant adverse effect on the SPA.</p> <p>The impact of proposals will be considered on a case-by-case basis. Where necessary, a project specific Habitats Regulations Assessment will be required. However, as the site is located within the 400m Zone of Influence (which does not mean that development cannot take place) priority should be given to alternative sites further from the SPA.</p> <p>If this site is selected for proposed allocation by the Neighbourhood Plan Steering Group, and accepted by Waverley Borough Council, the Neighbourhood Plan proposal would be implemented through a Green Belt boundary change which would form part of the Local Plan Part 2. This Green Belt amendment would need to be formally adopted by Waverley Borough Council prior to the Neighbourhood Plan's independent examination otherwise the Neighbourhood Plan would fail to comply with national and strategic local policy.</p>	

Site		Site Assessment Summary
		A 'transition' policy could also be included within the Neighbourhood Plan to ensure that an appropriate transition is made between open countryside and the built development of Elstead.
9	Land at Red House Farm	<p>The site is considered suitable for allocation but does have some significant constraints. The site is very well contained with existing mature/dense vegetation providing screening to the east, south and west and residential properties to the north provide further screening. However, although the site is immediately adjacent to existing residential properties it would extend Elstead further south.</p> <p>Glimpsed views of the site are possible from the residential properties, farmer's access in the southeast corner and the public rights of way which are adjacent to the site. However, these views could be screened through boundary planting and the residual effect on the Surrey Hills AONB or AGLV is not considered to be unacceptable. The suitability of the site would still be subject to the land being removed from the Green Belt. The site lies within a SSSI Impact Risk Zone 5km and is immediately adjacent to the Wealden Heaths Phase 1 SPA. Proposals for residential development must demonstrate that there would not be a significant adverse effect on the SPA.</p> <p>The impact of proposals will be considered on a case-by-case basis. Where necessary, a project specific Habitats Regulations Assessment will be required.</p> <p>However, as the site is immediately adjacent to the Wealden Heaths Phase 1 SPA (which does not mean that development cannot take place) priority should be given to alternative sites further from the SPA.</p> <p>If this site is selected for proposed allocation by the Neighbourhood Plan Steering Group, and accepted by Waverley Borough Council, the Neighbourhood Plan proposal would be implemented through a Green Belt boundary change which would form part of the Local Plan Part 2. This Green Belt amendment would need to be formally adopted by Waverley Borough Council prior to the Neighbourhood Plan's independent examination otherwise the Neighbourhood Plan would fail to comply with national and strategic local policy.</p>

2.9 The overall AECOM Site Assessment conclusion outlines:

"The summary table shows that both LAA sites [Sites 2 and 3] are considered to be appropriate for allocation in the Neighbourhood Plan but with significant constraints. Six of the sites submitted through the Neighbourhood Plan Steering Group's call for sites (three of which were discounted as part of the LAA 2016) are considered suitable with however, significant constraints. These constraints apply to all of the sites as Elstead is washed over

by the Surrey Hills AONB and AGLV and is within close proximity to the Wealden Heaths Phases 1 and 2 SPA and the Wealden Heaths Phase 1 SAC. The presence of these designations is not considered to rule development out at these sites as it is considered through sensitive design and the use of appropriate mitigation measures development can be acceptable when considered in the context of meeting Elstead's housing need. Furthermore, three of the sites (1, 8 and 9) are located within the 400m Zone of Influence around the Wealden Heaths Phase 1 SPA. Although their location within this Zone of Influence does not exclude development it is considered that priority should be given to alternative sites further from the SPA.

One of the sites submitted through the Neighbourhood Plan Steering Group's Call for Sites is not considered suitable for allocation. Site 4 is not considered suitable due to its location on a plateau which would result in any redevelopment becoming a prominent fixture within the Surrey Hills AONB and AGLV.

The site assessment therefore shows that there are eight sites in total that are potentially suitable to be put forward as proposals for housing allocations as part of the Elstead and Weyburn Neighbourhood Plan, if the identified constraints were resolved. These eight sites are a 'pool' of potential development locations which in total could accommodate approximately 167 homes; however only a small number of these would need to be selected to meet the housing requirement of 67."

Element 3: Walkable Neighbourhood

- 2.10 As referred above, Elstead Parish Council submitted representations to the WLPP2 process raising soundness concerns that insufficient consideration or weight had been given to seeking to locate new homes as close as possible to existing key facilities and services, but also maximising the use of previously developed land (See Appendix 2). With this in mind, the Element 3 process has considered how new housing delivered can support and enhance Elstead village as being a 'Walkable Neighbourhood'.
- 2.11 The National Planning Policy Framework (NPPF) outlines (paragraph 7) the purpose of the planning system is to contribute to the achievement of sustainable development. To achieve sustainable development the NPPF sets out (paragraph 8) three overarching objectives (economic, social and environmental), which are interdependent and need to be pursued in mutually supportive way so that opportunities can be taken to secure net gains across each of the different objectives.

- 2.12 Specifically regarding the social objective, the NPPF outlines the need to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being.
- 2.13 The NPPF principles of achieving sustainable development are intended to be applied at all levels of plan- and decision-making. Indeed, one of the key planning objectives listed within the WLPP1 is to ensure that the design, form and location of new developments contribute to the creation of sustainable communities that are attractive, safe and inclusive.
- 2.14 LPP1 Policy ST1 encourages new development to be located where opportunities for sustainable transport modes can be maximised, reflecting the amount of movement generated, the nature and location of the site and recognising that solutions and measures will vary from urban to rural locations. Policy TD1 seeks to ensure that new development is designed so that it creates safe and attractive environments that meet the needs of users and incorporate the principles of sustainable development.
- 2.15 The NPPF outlines (paragraph 102) that opportunities to promote walking, cycling and public transport use should be identified and pursued from the earliest stages of plan-making and development proposals.
- 2.16 In promoting healthy and safe communities the NPPF (paragraph 91) promotes social interaction through amongst other things creating strong neighbourhood centres and street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods and active street frontages.
- 2.17 Whilst requiring plan-makers to promote development which encourages walking and cycling, neither the NPPF nor the accompanying National Planning Practice Guidance (PPG) advise on acceptable walking distances to bus stops, railway stations or local facilities and services, leaving plan-makers to devise their own estimates.

- 2.18 However, the Government's recently published National Design Guide¹ (NDG), October 2019 defines 'walkable' as: "*Local facilities are within walking distance, generally considered to be no more than a 10 minute walk (800m radius)*". The NDG encourages creating compact forms of development as this brings people together to support local public transport, facilities and local services. Compact forms of development make destinations easily accessible by walking or cycling wherever this is practical and helps to reduce dependency upon the private car (paragraph 63 and page 20).
- 2.19 The 10 minute walk (800m radius) has been a long established and accepted principle. The Manual for Streets (Department for Transport, 2007²) promotes the concept of walkable neighbourhoods and these are typically characterised by having a range of facilities within 10 minutes' (up to about 800m) walking distance of residential areas which residents may access comfortably on foot (paragraph 4.4.1) However, it is noted that the Manual does outline that 800m is not an upper limit and refers to the Planning Policy Statement 13 (which has since been superseded by the NPPF) which stated that walking offers the greatest potential to replace short car trips, particularly those under 2 km.
- 2.20 Although walking has the potential to replace short car journeys under 2km it is noted from the National Travel Survey 2018 that for trips up to 1 mile (1,600m) 80% were undertaken by foot, but just over 10% of trips between 1 and up to 5 miles (1,600m and 8,000m) were undertaken by foot.
- 2.21 Given the above, to ensure Elstead village remains as a compact, healthy and safe walkable neighbourhood, where feasible and subject to other relevant planning matters, site selection preference has been given to development sites that maximise walking opportunities to key existing community facilities and services. Ideally, the majority of existing local facilities and services should be within 800m of the development site.

Preferred Housing Sites

- 2.22 Informed by the Site Assessment process outlined above, the SEA and HRA and community feedback to date has identified the following three sites as the preferred housing sites:

Site 2: Four Trees

Site 3: The Croft

¹

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/843468/National_Design_Guide.pdf

² https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/341513/pdfmanforstreets.pdf

Site 5: Sunray Farm.

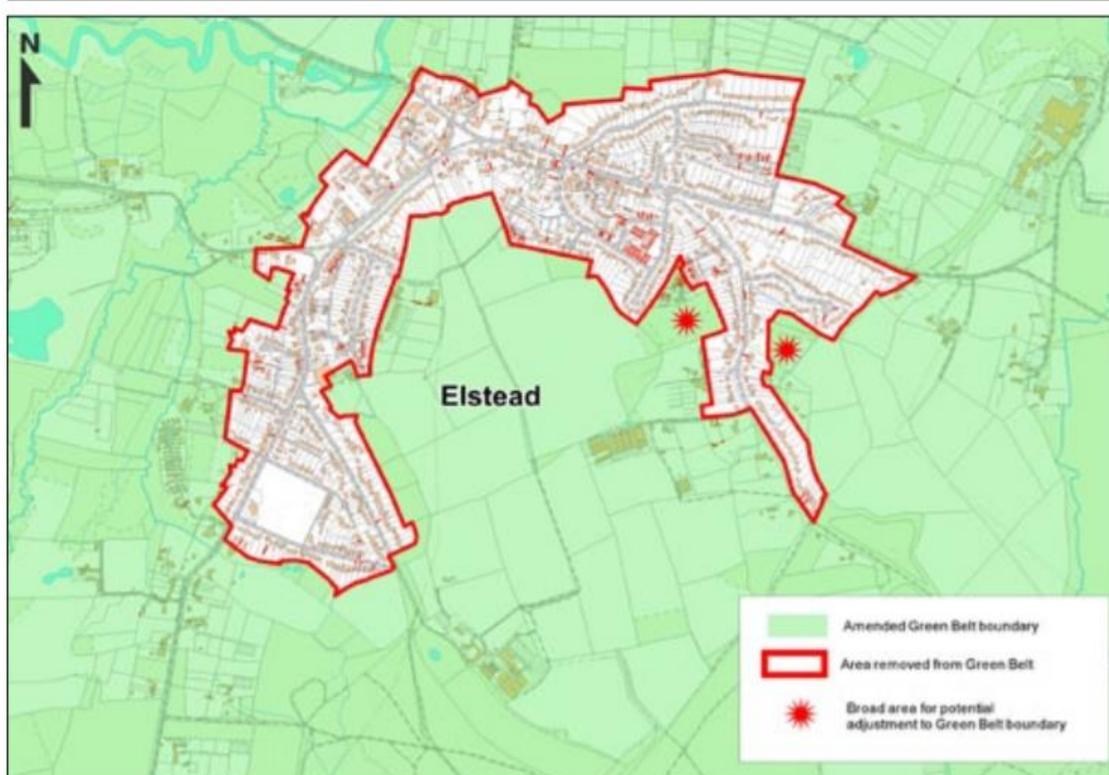
- 2.23 To support the walkable neighbourhood concept and maximise previously developed land, the preferred approach will be to maximise the development potential of Site 5: Sunray Farm.

3.0 Boundary Changes

3.1 As part of the WLPP1 process exceptional circumstances were demonstrated to justify the amendment of the Green Belt boundary in order to facilitate the development needs over the period up to 2032 and to promote sustainable patterns of development. Specifically regarding Elstead, paragraph 13.22 of the WLPP1 states:

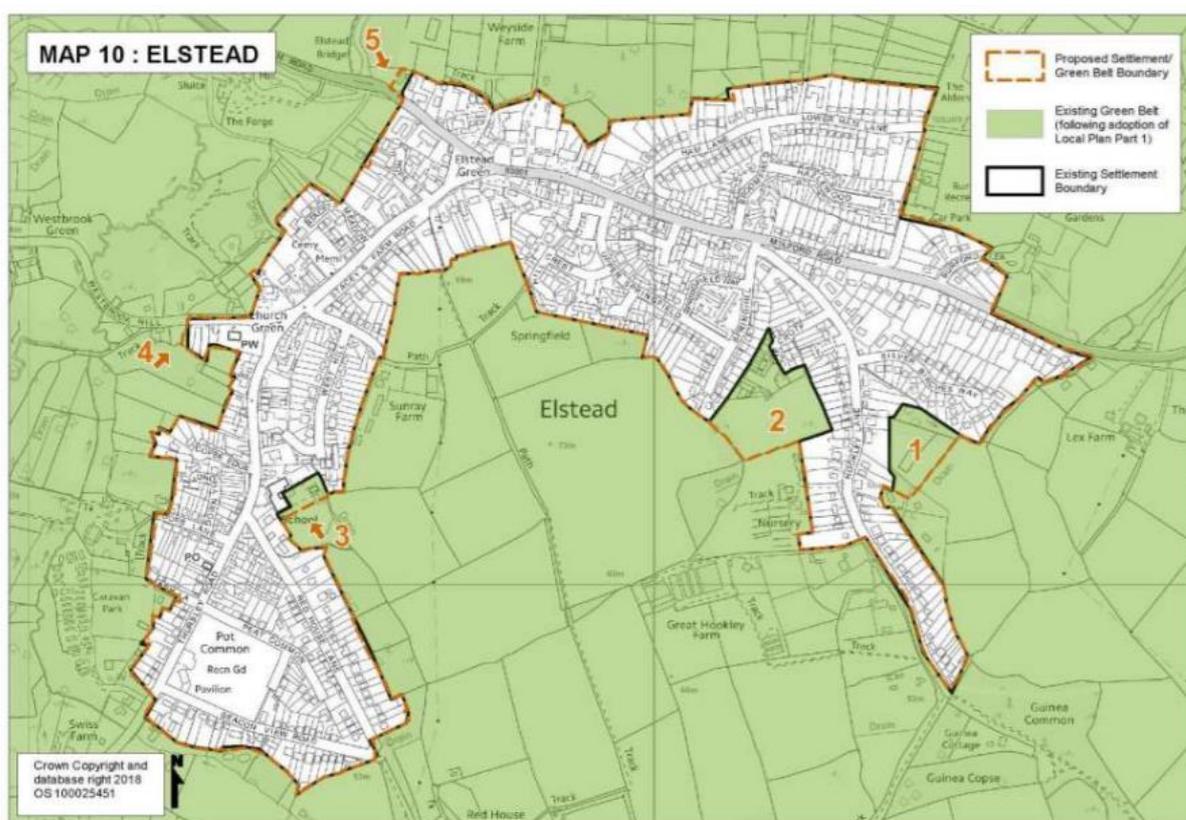
"The Local Plan insets Elstead from the Green Belt, based on the current settlement boundary defined in the 2002 Local Plan. There are some sites considered suitable for meeting future housing needs that would require adjustment to the existing settlement boundary. These are indicated on Plan 4. In addition, there may be other potentially suitable sites that will emerge through the Neighbourhood Plan process. The precise definition of the new settlement boundary will be identified in Local Plan Part 2."

Plan 4. Removal of land within Elstead from Green Belt



3.2 As part of the emerging WLPP2 process, WBC proposed five amendments to the settlement boundary around Elstead. The methodology applied by WBC is set out within **Appendix 3**. The relevant Elstead extracts from the WLPP2 consultation document are provided below:

Map 10: Elstead			
Anomaly	Area affected	Amendment	Justification
1	Land to the east of Four Trees, Hookley Lane	Extend the boundary to include field.	Criterion 3: Area identified in Local Plan Part 1 for removal from the Green Belt and is a potential site allocation.
2	Land to the south of The Croft	Extend the boundary to include field and built development.	Criterion 3: Area identified in Local Plan Part 1 for removal from the Green Belt and is a potential site allocation..
3	St. James C of E Primary School	Extend the boundary to meet physical features at St. James C of E Primary School.	Criteria 1, 2, 5: Since Local Plan 2002, there have been two extensions to the school, and an extension to the playground to the rear of the school. The proposed boundary follows physical features (hardstanding surfaces) and the outbuildings within the school's curtilage.
4	Land adjacent to 11 Westbrook Hill	Extend the boundary to include the whole of the outbuilding and follow defined physical features.	Criteria 1 & 5: The current boundary cuts through an outbuilding and therefore does not follow any physically defined features. There is no clear reason why the outbuilding should not be included and also follow physically define features.
5	Withybridge House, Farnham Road.	Extend the boundary to include Withybridge House.	Criterion 4: Although on the edge of the settlement, Withybridge House relates well to adjacent properties which are within the settlement boundary. It would therefore seem sensible to include the dwelling with the boundary. However, inclusion of the whole of the curtilage is not considered to comply with criterion 7.

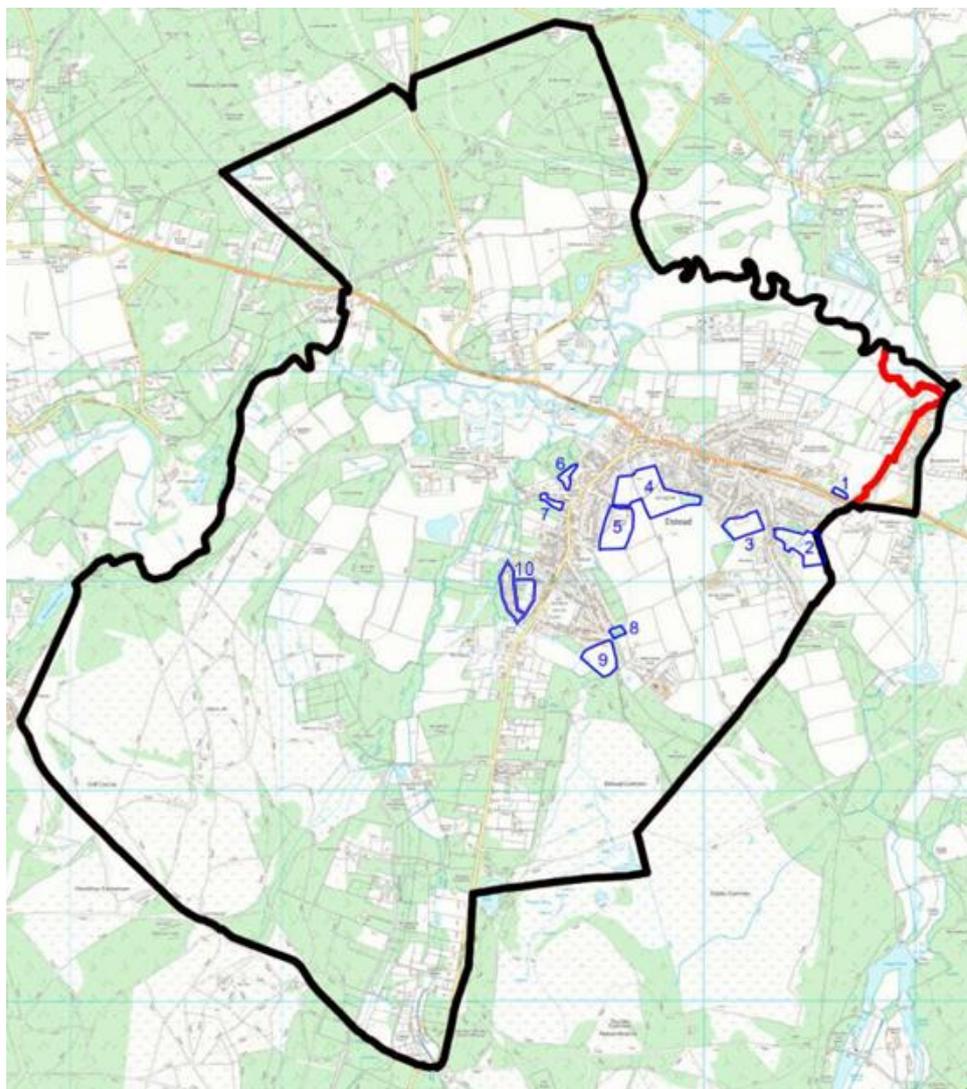


3.3 As part of the preparation of the Elstead and Weyburn Neighbourhood Plan consideration has been given to the settlement boundary in order to allocate the preferred development sites (Policies H1, H2, H3 and H4). The Working Group has reviewed the boundary work undertaken as part of the WLPP2 process but also undertaken a further refined review of the boundary using WBC's settlement boundary assessment criteria (Appendix 3). The Working Group's settlement boundary review had proposed the following amendments to the settlement boundary:

Anomaly	Area Affected	Amendment	Justification
1	Land at Four Trees (Site 2)	Extend the boundary to include the development area.	Criterion 3: Area identified in Local Plan Part 1 for removal from the Green Belt and is draft Neighbourhood Plan site allocation.
2	The Croft (Site 3)	Extend the boundary to include the development area.	Criterion 3: Area identified in Local Plan Part 1 for removal from the Green Belt and is draft Neighbourhood Plan site allocation.

Anomaly	Area Affected	Amendment	Justification
3	St. James C of E Primary School	Extend the boundary to meet physical features at St. James C of E Primary School	Criteria 1, 2, 5: Since Local Plan 2002, there have been two extensions to the school, and an extension to the playground to the rear of the school. The proposed boundary follows physical features (hardstanding surfaces) and the outbuildings within the school's curtilage.
4	Land adjacent to 11 Westbrook Hill	Extend the boundary to include the whole of the outbuilding and follow defined physical features.	Criteria 1 & 5: The current boundary cuts through an outbuilding and therefore does not follow any physically defined features. There is no clear reason why the outbuilding should not be included and also follow physically define features.
5	Withybridge House, Farnham Road	Extend the boundary to include Withybridge House	Criteria 4: Although on the edge of the settlement, Withybridge House relates well to adjacent properties which are within the settlement boundary. It would therefore seem sensible to include the dwellings with the boundary. However, inclusion of the whole of the curtilage is not considered to comply with criterion 7.
6	Sunray Farm (Site 5)	Extend the boundary to include the development area.	Criterion 3: The area is draft Neighbourhood Plan site allocation.
7	Moors Cottage	Extend the boundary to include Moors Cottage	Criteria 4: Although on the edge of the settlement, Moors Cottage relates well to adjacent properties which are within the settlement boundary. It would therefore seem sensible to include the dwellings with the boundary.
8	Little Barn	Extend the boundary to include Little Barn	Criteria 4: Although on the edge of the settlement, Little Barn relates well to adjacent properties which are within the settlement boundary. It would therefore seem sensible to include the dwellings with the boundary.
9	Brook House	Extend the boundary to include Brook House	Criteria 1 & 4: Although on the edge of the settlement, Little Barn relates well to adjacent properties which are within the settlement boundary. It would therefore seem sensible to include the dwellings with the boundary. The proposed boundary follows physical watercourse.

Potential Housing Sites



- Site 1: Milford Road
- Site 2: Land at Four Trees
- Site 3: The Croft
- Site 4: Land off West Hill and Crest Hill
- Site 5: Sunray Farm
- Site 6: Bargate House
- Site 7: Church Farm and West Brook Cottages
- Site 8: Land east of Red House Lane
- Site 9: Land at Red House Farm
- Site 10: Land at Kingsmede Elstead Park.

Appendix 2

Elstead Parish Council's Representations to the Waverley Local Plan Part 2 Consultation



ELSTEAD PARISH COUNCIL

Mrs Juliet Williams – Clerk

Email:elsteadpc.clerk@gmail.com

Chairman: Mr P.W. Murphy

25th June 2018

LPP2, Planning Policy,
Planning Services,
Waverley Borough Council,
The Burys,
Godalming
GU7 1HR

Dear Sir/Madam

LOCAL PLAN PART 2 – PREFERRED OPTIONS CONSULTATION

REPOSE FROM ELSTEAD PARISH COUNCIL – SITES FOR HOUSING

1 This document contains the comments by Elstead Parish Council on the ‘Preferred Options Consultation’ (POC) launched by Waverley BC as part of its preparations for the production of its Local Plan Part 2 (LPP2).

2 The Parish Council will also be commenting separately on WBC’s proposals in the same document for minor revisions to the settlement boundary.

Background

3 Local Plan Part 1 (LPP1) requires that the Elstead and Weyburn Neighbourhood Plan Area (E&WNHPA) shall provide sufficient land to accommodate a minimum of 160 new dwellings over the LP period (2013-2032). Of these 101 have already been built or have received planning consent, including 69 at the former Weyburn Works site. This leaves a minimum of 59 sites still to be allocated (not 67 as incorrectly indicated in the POC).

4 The Parish Council and the E&WNHP Steering Group had planned to include site allocations in its forthcoming plan. It had identified 2 appropriate sites capable of accommodating more than the minimum number of 59 dwellings. These sites were Sunray Farm (approx. 35-40 homes) and Croft 2 (28 homes).

5 WBC planners opposed the proposed development at Sunray Farm and instead promoted the development of an alternative site at 4 Trees, Hookley Lane, close to the Croft 2 site. The opposition from WBC planners effectively forced the PC and the NHPSG to abandon the plans to include housing sites in the E&WNHP.

6 In consequence, site allocations in the Elstead and Weyburn NHP area now fall to be determined as part of the LPP2 process. Here the POC document proposes that the bulk of the new homes to be built in the E&WNHP Area should be on the 2 sites in Hookley Lane, Croft 2 (35 dwellings) and 4 Trees (20 dwellings), with only 12 to be built at Sunray Farm. WBC also propose that both the Hookley Lane sites should be removed from the Green Belt in order to allow their use for housing.

7 Elstead PC considers these proposals to be unsound, for the reasons set out below.

Planning Framework

8 Local Plans need to conform to national policies set out in the National Planning Policy Framework (NPPF). Currently, the NPPF is under review and a revised draft was published earlier in 2018. It is likely that LPP2 will fall to be examined under the terms of the revised draft, which is expected to be finalised later this summer.

9 So far as the identification of housing sites in the E&WNHPA is concerned, the key sections of the NPPF are those dealing with the removal of land from the Green Belt in order to provide land for housing. In this context, the revised draft NPPF contains some important changes to the previous NPPF, viz:

- It gives priority to the use of previously developed land (PDL)
- It allows local policies, including NHPs, to make detailed amendments to GB boundaries where a strategic plan (eg LPP1) has demonstrated that changes to GB boundaries are necessary, eg to provide land for housing.

At the same time, the draft replacement NPPF retains the over-arching requirement that the need to promote sustainable development should be taken into account when reviewing Green Belt boundaries.

10 Elstead PC considers that WBC's proposals on site allocations and on the removal of land from the GB are not consistent with either the current NPPF or new draft NPPF. WBC's choice of sites fails to meet the sustainability requirement in the current NPPF and in terms of the changes contained in the new draft it fails to give priority to PDL and to take proper account of local policies. These points are dealt with in more detail below.

Sustainability

11 The supporting documents to the POC include a Sustainability Appraisal prepared by Atkins. Each of the three Elstead sites has been assessed as part of this study. Unfortunately, the appraisal is superficial and in particular lacks detail on the comparative merits of each of the sites. Furthermore, in the case of Sunray Farm the assessment is based on a much smaller number of homes than the E&WNHP team had in mind (12 as against 40). This led to a downgrading of the Sunray Farm site, but even then it scored higher than 4 Trees.

12 A more detailed sustainability assessment is therefore needed, which is capable of demonstrating the differences between each of the sites in terms of the key sustainability

elements. Chief of these is proximity to local services and the impact of development on traffic volumes. It is clearly important, in terms of reducing reliance on journeys by car and reducing traffic congestion (objective 14 in the LPP2 sustainability objectives), to locate new development as close as possible to existing services. Similar considerations apply in respect of objective 11 (improving access to local services and facilities). Each of the 3 sites needs therefore to be assessed against these objectives, which the Atkins study has failed to do.

13 The annex attached to this document contains a detailed analysis of the distances between each of the three sites and the key services and facilities available in Elstead. It conclusively demonstrates that the Sunray Farm site outperforms both of the Hookley Lane sites to an exceptional degree, particularly in regard to the majority of the most frequently accessed services and facilities (specifically the school and pre-schools, the main village shop, village hall, café, public houses, restaurants).

14 The implications of this study are quite clear. Both of the Hookley lane sites are so far distant from most of the village services and facilities (in most cases over 1km) that their future residents would be likely to access these by car rather than on foot or by bicycle. This would have major implications for traffic volumes and congestion, not only in Hookley Lane itself but for the rest of the village, particularly those parts adjacent to the main facilities. Already these areas (around the school and the main village green) are subject to serious parking and traffic problems which would only be exacerbated by large-scale development at these two remote sites in the village.

15 Sunray Farm, by contrast, is within easy walking distance (ie less than 500-600m) from the majority of services and facilities. Development at this site would therefore give rise to many fewer journeys by car and would significantly reduce the traffic impact of new development. It is therefore a much more sustainable site than either of the Hookley Lane sites in these respects.

16 The Atkins study marks down the sustainability of Sunray Farm because WBC have allocated to it only 12 dwellings. The site as a whole is however capable of accommodating up to 40 dwellings, which would allow for the same or indeed superior mix of dwellings than Croft 2 (to which Atkins attributes a high sustainability score on account of its capacity to accommodate a better mix of dwellings than either of the other 2 sites).

17 Overall, in terms of proximity to services and facilities and capacity to accommodate a wide range of home types Sunray Farm is clearly the most sustainable of the three identified sites and should be given priority on this account.

Previously Developed Land

18 Croft 2 and the whole of 4 Trees other than the dwelling are greenfield sites (the hard standing at 4 Trees – a former tennis court - is part of a residential garden and is therefore excluded from the definition of previously developed land). Sunray Farm, by contrast, in whole or in part falls within the definition of previously developed land owing to its established use for private equestrian purposes. A substantial part of the site, containing

several equestrian and former agricultural buildings together with a large exercise area, was the subject of a planning consent granted in 2012 for change of use from agricultural to equestrian. The remainder of the land has been used since 2012 for the keeping (feeding and exercising) of horses accommodated in the associated buildings. It is likely also that the land had been used a lengthy period prior to 2012 for keeping horses as the poultry farm originally on the site ceased operations over 30 years ago.

19 As Sunray Farm has been used for the keeping of horses for at least the last 6 years, a material change of use will have taken place *for the whole site* unless enforcement action is taken to prevent horse keeping on the adjacent pasture. Such action would no doubt be regarded as oppressive and inexpedient and therefore seems unlikely. The conclusion therefore must be that in law, and following the effluxion of time (4 years), the whole of the land will be regarded as previously developed land.

20 The new draft NPPF requires that where it is necessary to release land in the Green Belt for development (as is the case for Elstead), 'plans should give first consideration to land which has been previously developed'. Clearly WBC's proposals fall short of adhering to this requirement because they provide for only a relatively small part of the site to be released for development, while much larger areas of the entirely greenfield land at 4 Trees and Croft 2 have instead been put forward for release from the Green Belt.

21 Elstead PC further believes that the release of only a small part of Sunray Farm site (ie that part containing most of the buildings and the exercise area) would render the development unviable, as the value of the buildings themselves is likely to amount to a large proportion of the value of the land so released. It would also leave an area of 'orphan' land around the site which, dissociated from the buildings which serve it, would have no practical use.

Green Belt

22 WBC argue that 4 Trees and Croft 2 should be removed from the Green Belt, in preference to Sunray Farm, because to do so would 'round off' the settlement area and in consequence the impact on the Green Belt would be lessened. WBC also argue, in their GB Settlement Boundary Review Topic Paper, that the Sunray Farm site has no defined and permanent boundaries facing the open countryside to the east and north.

23 The NPPF, both the current version and the new draft, make no mention of 'rounding off'. What it does say is that, when defining Green Belt boundaries, the boundaries should be capable of clear definition, 'using physical features that are readily recognisable and likely to be permanent'. Croft 2 has boundaries which are reasonably permanent. 4 Trees is adjacent to development on 2 of its 3 sides, but the third side faces open country, with only a hedge in between. Sunray Farm intrudes into the Green Belt more than either of the other 2 sites, but is distinguished from much of the surrounding open land by the sharply rising land on its northern and eastern boundaries, which in addition makes it less visible from the neighbouring land. It is also well screened by an established hedge and tree line. These boundaries are for the most part clear and likely to be permanent. The WBC Topic Paper is therefore highly misleading in this regard.

24 One of the main objectives of the Green Belt is to maintain the ‘openness’ of the countryside. Sunray Farm contains several redundant and partly derelict agricultural buildings which significantly detract from the ‘openness’ of this section of the Green Belt. It is arguable therefore that the loss of this land to the Green Belt would be mitigated by the fact that it contains such buildings, whose removal would enhance the amenity of the adjacent area.

25 In purely Green Belt terms, there is no clear justification for giving the 2 Hookley Lane sites priority over Sunray Farm for removal from the GB. There is moreover little justification for removing land from the GB in order to provide land for housing when the result would be to put the houses in the wrong place.

Access Issues

26 Both of the Hookley Lane sites are located off a long and narrow cul-de-sac, with a narrow pavement running along one side of the road only. Hookley Lane is regularly used by heavy vehicles accessing a distribution centre at Great Hookley Farm, as well as by many horse riders visiting the common land lying at the end of the lane. Its junction with Springfield and the Milford Road is already congested at busy times. The service road to Croft 2 is extremely narrow and is inadequate to cope with a more than doubling of the number of homes which it would have to serve. The residents of Hookley Lane and of the original Croft development therefore have serious concerns about the traffic implications of two large new housing sites accessing the lane. They note that WBC has not undertaken any traffic survey to support its proposals.

27 The Parish Council takes these concerns seriously. Although the development of the whole of Sunray Farm would itself have significant traffic implications for the West Hill access road and its junction with Thursley Road, the Council believes that on balance these are likely to be more manageable than those arising from the development of both sites off Hookley Lane. West Hill is a much shorter and somewhat wider road, with wide pavements on both sides. It is therefore better placed to accommodate an increase in traffic than is Hookley Lane.

Local Policies

28 Had the E&WNHP been able to proceed as planned, it would have included Sunray Farm as the primary housing site, accommodating around 35-40 dwellings, with Croft 2 as a second site accommodating no more than 28 dwellings (but subject to the caveat that the access to the Croft site would need to be substantially improved to cope with the increased traffic). These plans were the subject of a consultation and open forum held in July 2017. Within the village there was widespread support for these proposals, while at the same time there was strong opposition to the development of both Hookley Lane sites. These 2 preferred sites would together have more than met the target of a minimum of 59 dwellings.

29 Regrettably, the E&WNHP proposals for housing sites were opposed by WBC and in the face of this opposition it was not possible to proceed with them in the plan. But they

remain the PC's preferred options for LPP2, for the reasons set out above. They continue to enjoy broad support within the parish and we are confident that the responses to the POC will confirm this.

30 Paragraph 135 of the new draft NPPF provides that 'where a need for changes to green Belt boundaries has been demonstrated through a strategic plan (ie LPP1), detailed amendments to those boundaries may be made through local policies, including neighbourhood plans'. Assuming that this draft is adopted as the replacement NPPF, Elstead PC considers that WBC is under a duty to reflect the blocked E&WNHP housing site policies in its review of GB boundaries, or failing that to permit the E&WNHP team to draw up its own boundaries instead.

Conclusions

31 Elstead PC submits that in terms of both the current and new draft NPPF's WBC's proposals for housing site allocations in Elstead are unsound because:

- By locating the bulk of new development at 2 remote and less accessible sites, in preference to a more accessible site closer to village services and facilities, they do not meet the test of sustainability;
- They do not give priority to previously developed land.
- They do not reflect local policies and plans.

32 Elstead PC would wish to discuss these concerns in more detail with WBC officials once the consultation is complete, in order to identify a mutually acceptable solution prior to the publication of a draft LPP2.

Please see the annex following which supports our views.

Kind regards

Juliet Williams
Clerk - Elstead Parish Council

ANNEX

Facility/Service	Sunray Farm	4 Trees	Croft 2	
St James' School	120	1500	1480	
Village Hall/Rainbows Pre-School/ Youth Centre	180	1140	1120	
Spar Store/Post Office	440	880	860	
Doctors' Surgery	520	640	620	
Thursley Rd Rec/Main Sports Pavilion/ Peter Pan Pre-School	600	1940	1920	
Dentist	500	780	760	
Pharmacy	800	480	460	
Little Barn Cafe	260	1100	1080	
British Legion Club	270	1110	1090	
St James' Church	260	1300	1280	
URC Church and Hall	720	560	540	
Woolpack PH	540	760	740	
Golden Fleece PH	560	920	900	
Mill PH	880	1240	1220	
Burford Lodge Rec /Tennis Club	1260	660	640	
Pangs Lodge Restaurant (Currently Closed)	130	1490	1470	
Nearest Bus Stop	200	360	340	
Telephone Exchange (to provide fast download Full Fibre)	130	1470	1450	

Notes

1 The figures show the distances in metres between the service/facility and the nearest pedestrian access point to each of the 3 sites.

2 The figures are rounded to the nearest 10 metres.

3 The distances are calculated on the basis of the shortest pedestrian route. But where the distance is more than 800m (half mile), the distance reflects the shortest route by vehicle.

Waverley Borough Council's Settlement Boundary Review

Criteria

The settlement boundaries should identify the area in which development is likely to be considered acceptable. These boundaries will reflect the extent of the main built up area, planning permissions and site allocations.

The boundary should:

1. Where practical, clearly follow defined physical features such as walls, fences, hedgerows, roads and streams.
2. Include built and commenced development, which has followed the adoption of Local Plan 2002, which physically relates to the settlement boundary.
3. Include sites with planning permissions and site allocations which physically relate to the settlement boundary.
4. Take into account the visual character of the settlements, the density and pattern of built development.
5. Include the curtilage of a property that relates more closely to the built up area (e.g. a garden) and where inclusion or possible development would not harm the structure, form and character of the settlement.
6. Include small pieces of land, below the threshold for allocation, which directly relates to the built up area and would be rounding off the boundary.

It should exclude:

- i. Large gardens or other areas whose inclusion or possible development would harm the structure, form and character of the settlement. This includes extended curtilages of properties that relate more closely to the open countryside.
- ii. Isolated and sporadic development that is clearly detached from the main built up area.
- iii. Low density residential areas, including single properties, which may have wooded or uncultivated curtilages