

Haslemere Neighbourhood Plan

Settlement boundaries and windfall background Paper

Introduction

Haslemere town and surrounding villages currently do not have formally recognised settlement boundaries, although there are informal boundaries based on the near complete enclosure of the settlements by protected green spaces (Green Belt, Areas of Outstanding Natural Beauty, Areas of Great Landscape Value, Countryside beyond the Green belt, land owned by the National Trust and the Wealden Heath Special Protection Area). To clarify the situation for future planning purposes the Plan proposes formal, defined and recognised settlement boundaries that maintain and contain the current urban boundaries, to protect the character of the area and prevent unrestricted growth into the countryside.

In order to accommodate all the housing that the Waverley Local Plan Part 1 states is needed, it must be noted that, given that Haslemere is surrounded by protected landscapes, there is not sufficient suitable land identified within the existing built area unless the available sites are developed at reasonable densities and there continues to be a substantial level of windfall development. The community has demonstrated its support for this approach in responses to consultations and the analysis below explains how the housing requirement for Haslemere can be met within the settlement boundaries set by the Neighbourhood Plan and in accordance with the Neighbourhood Plan policies.

It should be noted that over the Plan drafting process the housing targets for the area have increased 3 times from the original 690-790, to 830, to 990 (the last including Woking's unmet need).

Achieving the housing target

The table below demonstrates how the housing target for Haslemere can be achieved within the Neighbourhood Plan settlement boundaries.

Table 1: Haslemere Housing numbers projection

	Hectares	Proposed number of dwellings ¹	Dwellings per hectare
Sites already built or with planning permission granted (1/4/13 – 30/9/20)		528	
Sites within Neighbourhood Plan settlement boundaries or outside the settlement boundaries on previously built land:			
The Heights, Hill Road, Haslemere	1	21	23
West Street, Haslemere (Key site – mixed use)	2.5	40	16 (mixed use)
Wey Hill Fairground, Haslemere (mixed use)	0.6	55	92 (mixed use)
Youth Campus, Haslemere (all affordable)	1	40	41
Baron's Garage, Hindhead	1.6	38	24
Andrews, Portsmouth Road, Hindhead (67 bed care home)	0.55	35	
Hatherleigh	0.49	5	12
34 Kings Road	0.3	5	20
The Old Grove	0.78	18	23
National Trust Car Park, Branksome Place	0.4	<u>13</u>	<u>30</u>
		798	
Windfall estimate (see below)		<u>226</u>	
Total		1,024	
Housing Allocation		<u>990</u>	
Surplus		<u>(34)</u>	

¹ Completions and permissions agreed with WBC as at October 2020. Dwelling numbers for sites based on WBC LPP2 Pre-submission version.

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It should be noted that several of these sites are being proposed in the emerging Local Plan part 2 at densities significantly below the suggested densities in policy H2 of the Neighbourhood plan that encourages developments of 10 or more dwellings to achieve a density of 75dph within 1 km of the station and 45dph for all other areas.

Haslemere’s most notable feature is that it is entirely encircled by protected landscapes, and the value of the area’s ecology, landscapes and natural assets is unique, which means that special consideration needs to be given to protecting the town’s character and environment. WBC’s windfall forecast requires particular consideration, when the objective is to protect and conserve the Green belt, AONB and AGLV and preserving the special character and environment of this town, the gateway to the South Downs National Park.

Windfall

Historically, Haslemere has experienced high levels of windfall development because much of the older housing stock was developed on very large plots of land and many houses have been developed on land which was previously the gardens of neighbouring properties. In addition, the change of use from retail or office space to residential has represented 43% of the windfall housing in recent years².

NPPF Para 68 states “Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:

..... c) support the development of windfall sites through their policies and decisions– giving great weight to the benefits of using suitable sites within existing settlements for homes; “

NPPF para 70 states “Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.”

There is a strong pipeline of windfall sites in the Plan area. Many sites are very small and were not considered when sites were allocated for development in Waverley’s Local Plan Part 2. This is because sites of less than 0.25 hectares and sites expected to deliver less than 5 homes have not been considered for allocation in Local Plan Part 2.³ Based on the densities that the Haslemere Neighbourhood Plan encourages, a site of 0.25ha could deliver well in excess of five homes, subject to fitting well with the site’s setting and topography.

In addition, there are several larger sites which have not been allocated which are mostly located on designated land, several comprise previously built on land with large built footprints. Although development on these sites is constrained, since it would only be permitted if the proposals met the exceptions within National and Local planning policy, it is still possible that some of these sites will produce windfall development in the future.

Table 2: Potential sites not included in Table 1

Site name	Hectares	Land Designations
Critchmere Lane	0.30	
South East of Haslemere Water Treatment Works Sturt Farm	0.78	AONB
North of Saw Mills Sturt Farm	0.79	AONB
Red Court	4.9	AGLV
East of Longdene House	2.00	AGLV, AONB
West Down, Hindhead	0.77	AONB, AGLV
Adjacent to Weydown Hatch, Weydown Road	1.86	Green Belt, AONB

² Change of use windfall 115, Site intensification 150.

³ Waverley Land Availability Assessment (May 2018) page 7 para 2.6 and Appendix 1 p.39 – 43 – 65 sites below threshold (5 units)

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Site name	Hectares	Land Designations
Dene End Farm	0.40	AONB, AGLV
Kingfisher Farm, Sandy Lane	9.82	Green Belt, AONB, AGLV
Woolmer Hill	18.69	Green Belt, AONB, AGLV
Oak Tree Lane	0.73	AGLV
Royal School, Farnham Lane	3.00	Green Belt, AONB

Source: *Waverley Land Availability Assessment (May 2018) and Draft Local Plan part 2*

Haslemere has delivered many homes through windfall development in the past. In the seventeen and a half years ended 30 September 2020 an average of 39 dwellings per annum have been completed on windfall sites in the Plan area. Haslemere's historical windfall completions are as follows:

Table 3: Haslemere's historic windfall completions

Year	Net dwellings on Sites 1-4	Net dwellings on sites 5+	Total Net dwellings
2003/04	9	31	40
2004/05	14	55	69
2005/06	16	83	99
2006/07	16	60	76
2007/08	13	34	47
2008/09	10	34	44
2009/10	12	46	58
2010/11	11	10	21
2011/12	11	8	19
2012/13	5	2	7
2013/14	17	11	28
2014/15	12	29	41
2015/16	13	18	31
2016/17	16	16	32
2017/18	-1	6	5
2018/19	16	20	36
2019/20	10	16	26
2020/21 (Sept 20)	<u>5</u>	<u>0</u>	<u>5</u>
	<u>205</u>	<u>479</u>	<u>684</u>
Average Windfall Completions through September 2020	<u>11.7</u>	<u>27.3</u>	<u>39.1</u>
Average windfall completion for 17 years to March 2020*	<u>11.8</u>	<u>28.2</u>	

Source: *Waverley Borough Council Planning*

* Used by WBC in LPP2

Windfall completions have been low in the last 6 months to 30 September 2020 but this is potentially due to the impact of the Covid 19 pandemic.

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Table 4: Haslemere’s windfall permissions⁴

Year	Net dwellings
2013/14	67
2014/15	30
2015/16	43
2016/17	41
2017/18	38
2018/19 ⁵	75
2019/20	12
2020/21 (Sept 20)	<u>21</u>
	<u>327</u>
Average windfall permissions	<u>43.6</u>

Source: Waverley Borough Council Planning

Tony Burton, an independent Neighbourhood Planning consultant who has worked extensively on the Neighbourhood plan by carrying out two health checks advised that “It is entirely appropriate for the Plan to make an assumption on the supply of new dwellings from windfall sites which reflects local evidence of how many have come forward in recent years.”

Over the past 17 years to 31st March 2020, windfall development has made a regular contribution towards the housing land supply in the Neighbourhood Plan area and it is expected to continue to make a significant contribution especially once the impact of the Covid 19 pandemic and the uncertainty surrounding Brexit recedes. Although CIL rates were introduced for all new development in Waverley from 2019 viability studies carried out on behalf of WBC assert that there should not be an adverse impact on delivery of homes.⁶

Waverley’s data indicates that for small sites of less than 5 dwellings an average of 11.8 dwellings per annum have been delivered. In LPP2, Waverley have applied this rate for the final 9 years of the plan for a total of 106 homes.

For larger windfall sites, WBC estimates that over the past 17 years to 31st March 2020, 28.2 dwellings per annum have been delivered. In LPP2, Waverley have discounted the large windfall rate by 15% and included 2 years’ worth of windfall. Haslemere’s Neighbourhood plan deems 5 years’ worth of the large site windfall rate to be appropriate for the following reasons:

- sites of less than 0.25ha have not being considered for allocation by WBC
- based on the neighbourhood plan density policy 5 dwellings and over can be achieved on very small sites
- there is a good supply of potential sites as demonstrated by the Waverley Land Availability Assessment (May 2018) and Table 2 above.

Five years of 28.2 dwellings per annum discounted by 15% is a total of 120 dwellings through the remaining life of the plan.

The Neighbourhood plan therefore estimates 226 dwellings will be delivered by windfall development over the remaining life of the plan. This is an average of 19 dwellings per annum for the remaining life of the plan. This is conservative given that the average windfall rate for the last 17.5 years has been double at 39 dwellings per annum.

⁴ Excludes Sturt Farm planning permission for 132 homes

⁵ Excludes application for 14 homes at Longdene House which would not be permitted if another site granted permission is completed.

⁶ Waverley CIL Addendum to Viability Study – April 2018 Three Dragons -

https://www.waverley.gov.uk/downloads/file/6065/cil-cd-8_addendum_to_viability_study

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Location of the proposed boundaries

The settlement boundaries are defined as the built-up areas that are bordered by the land designated as Green Belt or Countryside beyond the Green Belt (designation defined in Waverley Borough Council's LPP1). Based on Regulation 14 consultation comments, a small area of land at Hindhead Golf Course, that was drawn inside the NP settlement boundary but is designated AONB, was excluded. The Sturt Farm site that is within AONB, was drawn within the settlement boundary. Some residents suggested that it should be excluded but as it has existing planning permission for 132 homes it has been left inside the settlement boundary.

Some anomalies were identified:

➤ **Land within the NP settlement boundaries with protection**

Land adjacent to the Churt Wynde Reservoir at Beacon Hill was included within the settlement boundary even though it is designated AONB. Though it was not mentioned in feedback during the Regulation 14 consultation, its geo-ecological features have nothing in common with the built area and this in combination with its existing designation were taken into account to exclude this land from the settlement in the post Regulation 14 plan.

➤ **Greenfield land outside the settlement boundary with no protection**

Land adjacent to existing housing on Swan Barn lane that is classified as within the GW5 Landscape Character designation was excluded from the settlement boundary. This site also has existing planning permission won at appeal and is being developed currently. It has now been included within the post Regulation 14 settlement boundary.

There are a number of candidate AONB areas around Haslemere that are currently designated AGLV. These have all been excluded from the NP settlement area. Examples are:

- Land at Red Court
- Land between Bunch Lane and Weydown Road (also designated an ASVI)
- Land north of Critchmere Lane and south of the Hanger Lane estate
- Land at St Edmunds, Hindhead and south of old A3.

There are three areas that are excluded from the settlement as defined by the NP settlement boundaries that are designated Countryside beyond the Green Belt but are not considered candidate AONB. These are the Springhead and River Wey Conservation Area and adjacent small green space, the railway cutting to the north of Haslemere adjacent to Grayswood Road and land at Branksome Place extending southwards to the east of the Holy Cross Hospital. The National Trust Car park at the north end of Branksome Place is proposed for development. It is designated AONB not subject to policy RE3⁷ so is not afforded the protection that AONB usually has. However, any development would be restricted due to its proximity to the Wealden Heaths II SPA and surrounding wildlife corridors as identified in Policy H14. All of these areas remain outside the settlement boundaries in the post regulation 14 Plan as they have high ecological value, proximity to key wildlife protection sites and have few features in common with the built area.

⁷ WBC LPP1 RE3 Landscape Character

New development must respect and where appropriate, enhance the distinctive character of the landscape in which it is located.

i. Surrey Hills Area of Outstanding Natural Beauty

The protection and enhancement of the character and qualities of the Surrey Hills Area of Outstanding Natural Beauty (AONB) that is of national importance will be a priority and will include the application of national planning policies together with the Surrey Hills AONB Management Plan. The setting of the AONB will be protected where development outside its boundaries harm public views from or into the AONB.

ii. The Area of Great Landscape Value

The same principles for protecting the AONB will apply in the Area of Great Landscape Value (AGLV), which will be retained for its own sake and as a buffer to the AONB, until there is a review of the Surrey Hills AONB boundary, whilst recognising that the protection of the AGLV is commensurate with its status as a local landscape designation.