

ENVIRONMENT AND HOUSING SCRUTINY COMMITTEE**4 SEPTEMBER 2007****SITE ALLOCATIONS DRAFT ISSUES AND OPTIONS****SUMMARY**

The Site Allocations Development Plan Document (DPD) will form part of the Guildford Development Framework (GDF). This report outlines the procedure for the first full public consultation stage of the Site Allocations DPD and proposes that the attached text be forwarded to the Executive on 6 September 2007 for agreement for public consultation from November 2007 to January 2008.

1. INTRODUCTION

- 1.1 The Site Allocations Development Plan Document (DPD) is being produced as part of the Guildford Development Framework (GDF). It will identify specific proposals to deliver the 'spatial strategy' and policy framework set out in the Core Strategy, including sites identified to deliver housing and other major development needs such as employment, retail, leisure, any known transport improvements, potential areas of open space and amendments to sites for preservation, such as the environmental protection of Sites of Nature Conservation Importance (SNCI's).
- 1.2 The proposed Issues and Options consultation text was presented to the Guildford Development Framework (GDF) Members' Working Group on 31 July 2007. The document has been updated to address the comments raised.

2. ISSUES AND OPTIONS CONSULTATION

- 2.1 The proposed text of the Issues and Options paper is set out in Annex I. It includes the list of sites that have been suggested through the Early Stakeholder and Community Engagement. The consultation response form is set out in Annex II. Respondents are requested to comment on the development potential of the sites suggested and propose any other potential development sites in the Borough.
- 2.2 It is recognised that, without any prior knowledge, the subject of Site Allocations could be difficult to understand and potentially worrying for those residing in close proximity to a site that has been included. Great emphasis has been placed on explanation and ease of understanding – for example, a full description of the role of Site Allocations within the GDF (Annex I - Section A), information about the key issues (Annex I - Section B), emphasis on the status of the Issues and Options consultation paper (Annex I - Section A and Section C) and the inclusion of a glossary (Annex I - Section D).
- 2.3 The consultation paper will be supplemented by a collection of Site Proformas, giving factual information, a map and a photograph (or aerial photograph where more appropriate, for example, large rural sites without any built form) for each site listed in Section C of Annex I. Examples of the Site Proforma are attached in Annex III. Examples of Ward location maps are attached in Annex IV. Where multiple representations have been made for the same site (but in many cases with slightly different site boundaries), the site has been listed once in the consultation list with corresponding site reference numbers. All site boundaries will be shown in the Site Proforma.

2.4 A Sustainability Appraisal will be carried out prior to the consultation to consider the likely significant sustainability effects of the sites suggested. An Appropriate Assessment is also required prior to the consultation to test the impact of the suggested sites and associated proposed uses on the Thames Basin Heath Special Protection Areas and objectives of the Habitat Regulations. The Sustainability Appraisal Report will be available for consultation alongside the Issues and Options paper. It is not necessary to consult on the Appropriate Assessment as it forms part of the GDF evidence base. Both reports will inform the selection of sites for the Preferred Options stage.

2.5 Respondents will be asked to submit comments using the form set out in Annex II, and return it using the freepost envelope provided. There will also be the opportunity to submit comments online.

3. SURREY COUNTY COUNCIL

3.1 Surrey County Council Highways Authority has indicated that it can provide comments on each site suggested at the Early Stakeholder and Community Engagement stage. Where appropriate, this information will be fed into the Site Proforma, taking the form of brief notes under 'other constraints'.

4. THRESHOLD

4.1 At the Early Stakeholder and Community Engagement stage, a site area threshold of 0.4ha or more was set. However, due to the possibility of higher density developments in sustainable locations and not wanting to limit potential on small sites, the threshold has been relaxed downwards in the Issues and Options consultation.

5. ADDITIONAL CONSULTATION

5.1 An additional, second Issues and Options consultation may be required in April/May 2008 to consult on sites that were suggested during the consultation in November 2007 – January 2008. A Sustainability Appraisal and Appropriate Assessment will also be needed of the additional sites to inform the Preferred Options.

6. CONSULTATION PROCEDURE

6.1 Land registry searches are currently being carried out on all site suggestions to ensure that contact is made with the landowner(s). The letter (which was approved by the GDF Members' Working Group on 21 June 2007) will be sent out shortly. Members will receive an electronic copy of the letter for information and the list of suggested sites.

6.2 During the consultation itself, all those whose details are listed on the GDF consultation database, all those who submitted a site suggestion, and all identified landowners will be sent a copy of the Issues and Options consultation paper and response form. The Specific Consultation Bodies (as set out in Appendix 1 of the Statement of Community Involvement) will also be sent a copy of the Site Proformas (CD format). This includes all Parish Councils.

6.3 The consultation material will be available online and in hard copy at the Planning Reception, Millmead and at Guildford, Horsley, Ash and mobile libraries. There will

be promotions at local events, such as the Guildford Farmers' Market, and visual displays in public buildings e.g. Spectrum.

- 6.4 The consultation paper will be piloted. Up to twenty non-planning Council staff will be asked to read the text in the consultation paper and provide comments. A further pilot will be carried out when the text has been formatted by the Graphics Assistant to make sure the layout is comprehensible. Plain English advice will also be obtained from the Communications Team.

7. GYPSY AND TRAVELLER SITES

- 7.1 To be consistent with Government guidance to regional planning bodies, any suitable housing sites which come forward through the Site Allocations DPD process may also be suitable sites for Gypsies and Travellers.
- 7.2 Section B (Annex I, page 7) of the draft Issues and Options document introduces the issue of Gypsy and Traveller accommodation in the Borough and of the requirement to carry out a Gypsy and Traveller Accommodation Assessment (GTAA).
- 7.3 The Site Proforma does not list the source of the site suggestions. The Gypsy and Traveller sites that are being put forward at this stage are mainly from a report to the Council's former Policy and Resources Committee on 29 January 1992. This does not mean that other potential sites will not be considered as the Council proceeds through the Site Allocations process. This is the last time potential Gypsy and Traveller sites were reviewed. The list of sites does not include Wyke Avenue and Lakeside Close, but does include Home Farm. Whittles Drive, Normandy, is shown as a potential Travelling Showmen site. The existing site at Whittles Drive has a temporary planning permission for 12 pitches, which expires in December 2008.
- 7.4 At this stage, the list of sites shows the suggested use as submitted by the respondent to the Early Stakeholder and Community Engagement. Therefore, at present, the only sites suggested as potential Gypsy and Traveller sites are those put forward from the 1992 review. However, before the list of suggested sites (Section C Annex I) and in the background information section (Section B Annex I), it is made clear that any sites suitable for residential development may also be suitable Gypsy and Traveller sites, and that such sites will be selected sequentially. Detailed assessment will inform suitability. Further potential Gypsy and Traveller sites may come forward as sites can still be suggested at the Issues and Options stage.

8. COMPLIANCE WITH THE CORE STRATEGY

- 8.1 The drafting process has raised methodological questions in relation to conducting the early stage of the Site Allocations DPD close to the Core Strategy submission. There are currently no examples of good practice elsewhere, as no Site Allocations DPDs have yet been through the LDF examination process. Advice was therefore sought from the Government Office for the South East (GOSE) and the Planning Inspectorate with regard to the requirement to accept site suggestions that do not comply with the Core Strategy's spatial approach (for example, greenfield sites). Informal discussions suggested that Officers should not judge site suggestions before considering public comment. It was decided to proceed by allowing submissions of any sites that were deemed by the respondent to have development potential.
- 8.2 Feedback has now been received from the Planning Inspectorate, which advises that as the Core Strategy is close to submission stage (the stage at which the Council formally puts the document forward as a sound document), any sites that are

included in the Site Allocations Issues and Options DPD as potential development sites should logically be compliant with the spatial strategy set out in the Core Strategy. In other words, the spatial debate that was conducted at the Issues and Options stage of the Core Strategy in March – April 2005 should not be re-opened.

- 8.3 It must be noted that the Site Allocations DPD does not solely consider sites for residential use, but also for other uses. For example, a site that has been suggested in the Green Belt may not be suitable for private residential development, but there may be scope for other uses e.g. recreational/agricultural. To provide criteria relating to the suitability of all land uses in relation to location designations at the Early Stakeholder and Community Engagement stage would have been confusing for the reader and difficult to achieve. At that stage, allowing submission of any site was therefore the most practical way to proceed.
- 8.4 It is, therefore, important to list all sites that have been suggested so far in the Site Allocations Issues and Options consultation paper to avoid disappointing the initial respondents and ensure proper consideration of their proposal (see Section C of Annex I for the full list of site suggestions). However, prior to the list of suggested sites, the explanatory text emphasises that sites which are compliant with the Core Strategy will be the Council's first choice when allocating sites. It is not the intention to raise expectations, therefore, explanation is needed of the likelihood of a site suggestion progressing to the Preferred Options stage.

9. TIMESCALES

- 9.1 As set out in the March 2007 Local Development Scheme (LDS), the Site Allocations Issues and Options consultation will run from November 2007 to January 2008. It is anticipated that the consultation will commence on 21 November 2007 and finish on 30 January 2008. This allows adequate time for respondents to obtain the supplementary consultation documents and acknowledges the Christmas holiday period.

10. DATA PROTECTION

- 10.1 The factual information in the Site Proforma is the only site information to be published. If a request is made to view the information that was submitted and any information collected on the site, access will be allowed, under the Freedom of Information Act.

11. CONCLUSION

- 11.1 The Site Allocations DPD Issues and Options consultation will run from November 2007 to January 2008 and be in accordance with the adopted Statement of Community Involvement (February 2007). The consultation will provide the opportunity to comment on potential development sites that have been suggested and to put more sites forward.
- 11.2 The Site Allocations Issues and Options consultation paper is recognised as potentially contentious, especially if misinterpreted. Every attempt has been made to make the text 'user friendly', comprehensible and to avoid the Council appearing to 'promote' sites that are not compliant with the Core Strategy. The piloting of the consultation and input from the Communication Services, alongside any recommendations made by Members will help to ensure the consultation runs as smoothly as possible and respondents clearly understand what information is being requested.

12. RECOMMENDATION

- 12.1 At its meeting on 6 September 2007, the Executive will be requested to approve the following recommendations:
- (I) That the draft Site Allocations Issues and Options consultation text (Annex I and Annex II) and accompanying information (Annex III and Annex IV) be approved for public consultation; and
 - (II) That the Head of Environmental Policy and Design Services be authorised, in consultation with the Lead Member for Environment, to make further amendments to the text (Annexes I – IV) in light of the pilot study, comments made by Communications Services, Sustainability Appraisal, Appropriate Assessment, advice from GOSE and liaison with key statutory consultees.
- 12.2 The Committee is asked to submit its comments on the above recommendations for consideration by the Executive on 6 September 2007.

Background Papers:

Statement of Community Involvement (February 2007)

Previous Issues and Options consultation papers (can be viewed on the Council's website at www.guildford.gov.uk > Planning & Building Control > Consultations > Previous GDF Consultations.)

Core Strategy submission document - www.guildford.gov.uk > Planning & Building Control > Guildford Development Framework > Core Strategy – and Item 7 on this agenda.

Site Allocations DPD report to the GDF Members Working Group 21 June 2007 (Item 5)

Originator:

Heather Sandall, Environmental Policy and Design Service
Direct Line: 01483 444465
E-Mail: heather.sandall@guildford.gov.uk

Darren Carroll, Environment Policy and Design Service
Direct Line: 01483 444669
E-Mail: darren.carroll@guildford.gov.uk