

## ANNEXE 2

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Date: 4<sup>th</sup> September 2014

Dear Sir/Madam

### **DRAFT GUILDFORD BOROUGH LOCAL PLAN: STRATEGY AND SITES – CONSULTATION**

Thank you for consulting Waverley Borough Council on the above document. This matter was considered by the Council's Executive at its meeting on 2<sup>nd</sup> September, when it agreed to make the following response on behalf of Waverley Borough Council.

#### **Policy 2 – Borough Wide Strategy Housing Provision**

Waverley supports the housing target set out in Policy 2 of 652 new homes per annum from 2011 to 2031 (13,040 new homes) as it is the level of housing need that has been objectively assessed in the draft Guildford SHMA January 2014. The SHMA states that 671 new homes are needed, but that the amount has been reduced to take account of the impact that students have on housing need.

Paragraph 4.9 of Guildford's Housing Topic Paper states that, after applying constraints, Guildford is able to demonstrate that it can meet its objectively assessed need and therefore cannot justify a housing target lower than the objectively assessed need. Waverley supports this approach. Given the environmental constraints in Waverley, the Council considers that any housing target in Guildford less than the objectively assessed needs would put pressure on Waverley as they are both within the same housing market area. Guildford's approach to meeting all their housing needs should continue, even if the joint SHMA that is currently being undertaken by Guildford, Waverley and Woking shows a higher number of homes needed for Guildford than the current evidence in the SHMA demonstrates.

#### **Policy 2 and 13 - Economic Development**

Guildford has an important economic role in the region which influences Waverley's economy in terms of the provision of jobs and businesses that have strong commercial links with businesses in our borough. It is therefore important to Waverley that the Guildford Local Plan maintains this role but also ensures that Guildford's growth does not weaken Waverley's economy.

Policy 2 (and consequently Policy 13) states that Guildford will allocate between 21.6 ha and 29.2 ha of employment land that will provide between 10,900 and 14,800 new jobs.

The explanatory text to Policy 13 in paragraph 4.153 states that the draft Employment Land Assessment (ELA) 2014 identifies a residual need for between 10 and 17.6 ha of employment land. This suggests that the allocation in the draft Local Plan is over-providing. However, it is not clear how the requirement referred to in both the policy and the explanatory text was arrived at, as the latest draft ELA 2014 is not publicly available. Waverley cannot, therefore, comment fully on these proposals until then. It is essential that the ELA contains a rigorous analysis of commuting patterns.

### **Policy 8 - Surrey Hills Area of Outstanding Natural Beauty**

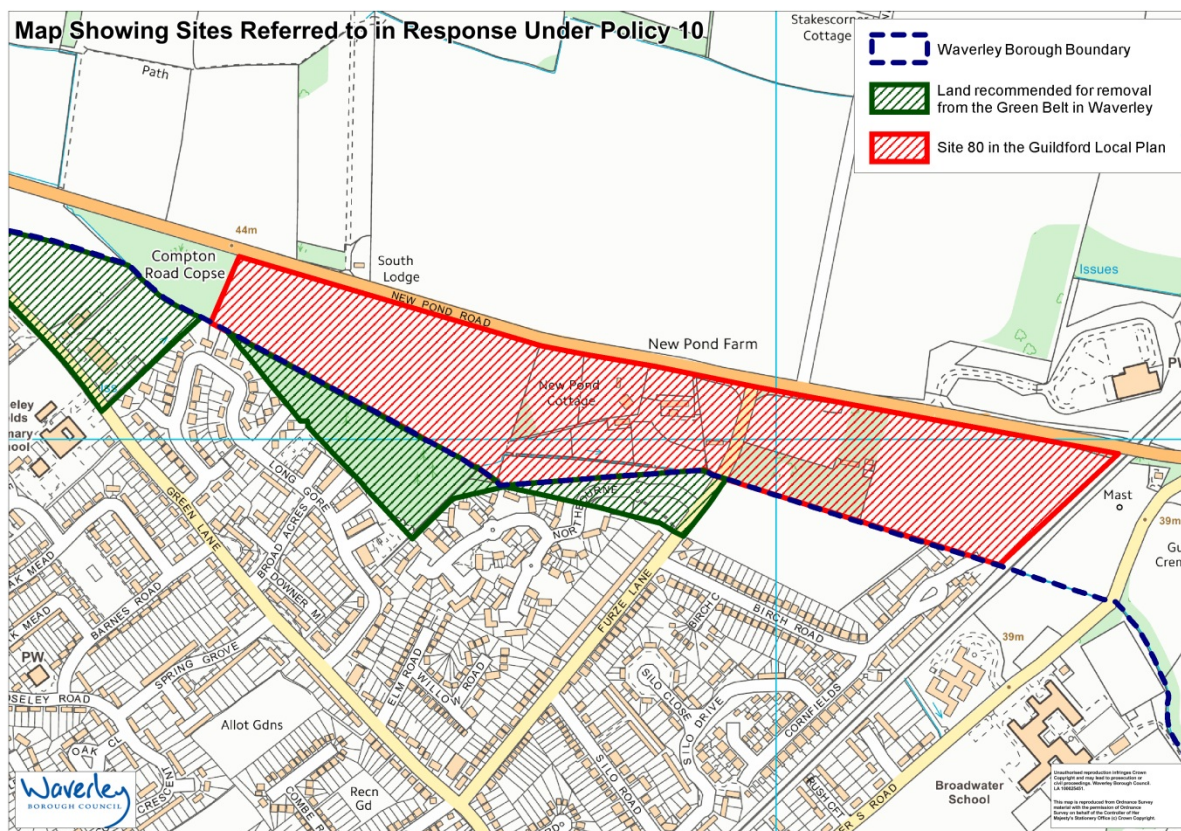
Waverley's approach to the Area of Great landscape Value (AGLV) is to retain its designation until such time Natural England completes its review on the boundary of the Surrey Hills Area of Outstanding Natural Beauty (AONB). Waverley's current policies combines the policy for the AONB and the AGLV despite the latter being a local rather than a national designation.

Given that the AGLV is a county wide designation and Guildford and Waverley adjoin each other, it is important that the approach to development within the AGLV is consistent between the authorities. Waverley therefore supports the approach in Policy 8 of the draft Guildford Local Plan to keep the boundaries for both the AONB and the AGLV until such time as a review by Natural England is undertaken. Waverley also supports Policy 8 where it states that proposals in the AGLV will need to demonstrate the same consideration of the principles for development set out for the AONB or against criteria that is to be subsequently set out in the Local Plan: Delivering Development. However, Waverley will want to ensure that the criteria in any subsequent development plan document maintain the level of protection for the landscape in the AGLV until the AONB review is completed.

### **Policy 10 – Green Belt and the Countryside**

The Council notes that Guildford has undertaken a review of its Green Belt, in accordance with national policy review, and welcomes this. Waverley has also recently carried out a Green Belt review as part of the evidence base for our own new Local Plan. It is therefore important that Guildford and Waverley work closely together to ensure consistency of approach under the duty to cooperate. We therefore welcome the references to joint working and consistency of approach in paragraph 4.113 of the Draft Local Plan and in paragraph 4.17 of the Green Belt and countryside Topic Paper.

One of the proposed changes relates to land south of New Pond Road, adjoining Farncombe, to the north of the built up area of Godalming. This site is contiguous with Waverley Borough. It is proposed that this site (ref. no.80) would be removed from the Green Belt (up to New Pond Road) and would be developed for about 100 homes in years 6-10 of the plan period. Waverley's Green Belt Review has found that New Pond Road (B3000) would constitute a definite and defensible northern edge to Farncombe and that there may be some potential to remove a small amount of land from the Green Belt up to this road without causing significant harm, provided that this is done in conjunction with Guildford Borough Council. For ease of reference, a map showing both your site 80 and the land recommended for removal from the Green Belt in the Waverley Green Belt Review is shown below.



However, notwithstanding the administrative boundary and in which local authority they are located, should these parcels of land be released from the Green Belt, they would effectively constitute an urban extension to Godalming. The occupiers of the new homes would primarily look to Godalming to supply their services and facilities, for example education and shopping, and it would be important to address any cross-boundary impacts of the development. Therefore, the Council would request some reassurance that the relationship with Godalming is explicitly acknowledged and that the resultant infrastructure impacts of the development on the town are fully addressed and shared with Waverley through any subsequent planning application.

### Policy 11 – Ash and Tongham Strategic Location for Growth

It is stated in Table 1 that the Ash and Tongham area will deliver 1,215 net new homes. However, the table at the start of the 'Planning for sites' supporting document states that the total number of homes to be delivered in the same area (on sites 53-56) would be 1,564 and, in addition to this, that sites 78 and 79 would be developed for 62 and 71 homes respectively. The inconsistency is confusing and should be addressed. Whatever the correct number, a significant number of new homes are proposed in the Ash and Tongham growth area. Additional employment land is proposed in this area as well, for example on site 55. The area is close to the Badshot Lea area of Farnham and the Council would welcome the opportunity to discuss with you the wider impact of any potential land releases not only in Guildford but also in the eastern outskirts of Farnham. It would be important for these impacts, including impacts on the Thames

Basin Heaths SPA, to be addressed in the subsequent Supplementary Planning Document and any subsequent planning applications.

### **Policy 15 and 16 – Guildford Town Centre and District and Local Centres**

Guildford town centre will continue to be promoted as the key retail centre for Surrey, and this is to be expected. Currently the plan proposes some 50,000 sq m gross of comparison floorspace and 13,000 sq m of convenience shopping space. It is noted that the future floorspace requirements do not include the needs of new housing development included in the draft plan, and that the 2011 Guildford Retail and Leisure Needs study is to be updated prior to submission, to reflect this. Once the need is qualified, the council intends to confirm where this will be accommodated within the most suitable designated retail/service centres in the borough. This information will also be included in the publication plan prior to submission.

Guildford exerts considerable influence over Waverley residents' shopping behaviour, although all of its towns and Cranleigh are very successful in retaining local convenience goods expenditure, and we would wish this to continue to be the case. Waverley would therefore wish to comment in more detail once the updated figure is known and sites allocated, to ensure that the vitality and viability of its towns are not compromised.

### **Policy 17 – Infrastructure and Delivery**

The policy is commendably comprehensive, but the supporting text would benefit from more explanation in key areas.

Paragraph 4.199 makes only a passing reference to SANG as a form of green infrastructure which underplays its significance in that respect. It would help to have more explicit reference to the legal obligation to provide mitigation for impacts on relevant SPAs. Furthermore, it should be explicitly acknowledged that this is a cross-boundary issue that is being addressed in conjunction with neighbouring authorities, such as Waverley, with similar obligations.

Paragraph 4.208 needs a clearer reference to the fact that draft infrastructure schedule is very much a 'work in progress'. The preamble text to the schedule in Appendix B does say something along these lines and perhaps could also be included here. In any event, it needs to be acknowledged that the gaps in the schedule regarding costs and/or timing are being addressed, and that the lack of such information should not imply any deficiencies in the deliverability of proposed developments.

### **Policy 19 – Green and Blue Infrastructure**

See comments on Policy 17 (above) regarding SANG.

### **Planning for Sites section**

In addition to the sites adjacent to Farncombe and at Ash and Tongham mentioned above in our comments on Policies 10 and 11, a number of other sites proposed for allocation could impact on Waverley.

Site 68 at Hornhatch Farm, Chilworth (80 homes) is very close to the boundary with Waverley and is close to the villages of Wonersh and Shamley Green. Again, it will be important to consider and address any potential cross boundary impacts, for example in terms of traffic and education.

In addition, there are a number of very large allocations that could potentially impact on Waverley. These include sites 59 and 60 (urban extensions to Guildford, each for 2000 homes or more plus other uses), as well as site 66 at the former Wisley airfield (up to 2100 homes and other uses). These sites are all close to the A3, which passes through Waverley. The Council would welcome the opportunity to discuss the potential cross boundary impacts of these schemes to see how these could be mitigated. As well as their individual impacts, the Council is concerned to ensure that the cumulative impacts of these various developments are assessed.

As a more general point, and in an attempt to be constructive, it would be helpful if the final proposed submission version of the plan could be clearer and more specific on the sites to be allocated and how many homes are proposed. Although these sites are listed in the 'planning for sites' supporting document, the plan itself is quite vague about specific allocations. Table 1 is useful to some extent but it is only a summary. For example, Policy 9 does not mention the site adjoining Farncombe (although it is referred to in paragraph 4.113) and none of the Ash and Tongham sites are mentioned in Policy 11 or the supporting text.

### **Conclusions**

Waverley acknowledges the considerable effort that Guildford is seeking to meet its identified housing needs, and supports the number of homes per annum proposed in the Draft Local Plan. However, as stated in our response to the Issues and Options paper in November last year, future development in Guildford has the potential to have a significant impact on Waverley, both individually and cumulatively. This is especially important given Guildford's sub regional role for employment, leisure and retail.

The Council would again like to stress the importance of, and our commitment to, continued joint working and liaison between Guildford and Waverley as our respective new Local Plans each reach a critical stage.

Yours sincerely,



Graham Parrott  
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