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Dear Ms Humphrey

Guildford Borough Council New Local Plan consultation – Issues and Options

Thank you for consulting Waverley Borough Council on your Local Plan issues and options. This matter was considered by the Council's Executive at its meeting on 5th November, when it agreed to make the following response on behalf of Waverley Borough Council:

Chapter 1 – “Introduction”

Question 1 – Strengths and Weaknesses

Response: It is not clear why having a large and growing population is regarded as a weakness. The Council also notes that in the section on the economy and jobs, strengths include the statement that Guildford is the most competitive non-metropolitan centre in the UK and that it is a sub-regional centre and the principal shopping centre in Surrey.

Question 3 – Vision and Objectives

Response: Shouldn't the objectives be more explicit in recognising the sub-regional role that Guildford plays in terms of a centre for employment, education, leisure and retailing?

Chapter 2 – “Planning for the homes we need”

General response: It is noted that this section contains a number of detailed questions about densities, thresholds for affordable housing etc. but does not present any options about the overall number of new homes.

Chapter 3 – “Planning for the economy and jobs”

Question 11 – Approaches to meeting existing and new employment needs

Response: It is noted that there is a reference to housing costs influencing commuting patterns and the document states that it is important that commuting both in and out of the borough is reduced. It is not clear how this might be achieved.

Question 12 – Approaches to development in town centres

Response: Waverley Borough Council notes the comment in paragraph 3.41 about keeping more spending within the borough's centres. It is important that in planning for growth/development in Guildford town centre, account is taken of the potential impact on nearby centres, such as Godalming.

Chapter 4 – “Planning for access and transport”

Question 14 – Options for balancing development with traffic and congestion

Response: A key issue will be to ensure that the number of homes being planned for takes account of the economic needs of the borough and contributes to addressing the commuting patterns identified above.

Chapter 5 – “Planning for infrastructure and services”

Question 16 – Infrastructure issues

Response: It is essential that, in planning for the infrastructure needed to support growth within Guildford Borough, any cross boundary infrastructure issues are identified and addressed.

Chapter 6 – “Planning for the Environment”

Question 17: Green Belt, Countryside and green open spaces

Response: Under the duty to co-operate this Council would welcome collaboration in relation to work involving Green Belt boundary reviews close to the Waverley boundary.

Chapter 8 – “Cross boundary issues”

Question 23 – strategic cross boundary issues

Response: Whilst it is important to identify the potential impacts of single large developments that may be planned close to the Waverley boundary, it is also important that the potential cross-boundary impacts of the overall level of growth planned for Guildford Borough are identified and addressed.

In terms of specific issues relating to Waverley, additional matters not identified include:

- Cross boundary impacts from town centre development on neighbouring centres;
- Gypsy and Traveller issues, particularly in relation to transit sites;

- Cross boundary housing and business needs

Chapter 9 – “Planning for sites and spatial options”

Question 24 – choices for meeting housing needs

Response: It is noted that a range of scenarios is identified in terms of the amount of housing and the components of this. These range from 7,517 homes in Example 1 to 21,456 homes in Example 7. In practice, however, it is difficult to comment on these without an indication of the housing need/demand within Guildford. Although the “How Many Homes” background paper is helpful, it does not indicate what the Council believes is its ‘objectively assessed’ need, which will not be known until the Council updates the Strategic Housing Market Assessment (SHMA).

Although comments are invited on some of the specific opportunities for housing growth, the cross boundary implications can only properly be assessed when considering the combination of options and the cumulative cross boundary impact arising from these.

Question 26 - Land surrounding Ash and Tongham

Response: Given the proximity of these sites to Waverley it will be important to identify and address any potential cross boundary impacts, for example in terms of transport/traffic and education. In addition, the Council would welcome the opportunity to consider the wider impact of potential land releases in this area not just within Guildford Borough but also any sites that may come forward in Waverley around Badshot Lea and the eastern outskirts of Farnham.

Question 27 – New Green Belt land

Response: The Council would welcome the opportunity to discuss in more detail the options for reviewing Green Belt boundaries in the western part of Guildford Borough and the implications for any similar work within Waverley.

Question 30 – Potential development areas around other villages and settlements

Response: The Council notes that this question relates specifically to settlements in neighbouring boroughs where expansion to these settlements would involve land within Guildford Borough. Examples given include Milford, Farncombe, Bramley and Godalming. If these options are to be considered further then early discussion with Waverley Borough Council is essential. In addition, it must be recognised that in practice such developments would be likely to make a greater contribution to meeting needs arising in those settlements (i.e. outside Guildford Borough).

Question 31 – Significant expansion of existing villages

Response: The document identifies the potential to make a significant expansion to an existing village. One of the areas identified is land between Flexford and Normandy which could possibly provide 2,700 new homes. Given that this is relatively close to Waverley, it would be essential that any assessment of the impact of such a development, and the infrastructure required to support it, takes full account of cross-boundary impacts.

General comment on potential development sites

Response: The Council notes that some of the specific sites identified in the document are either close to or adjoin the Waverley boundary. In particular sites 27, 51, 52, 53 and 60. The Council would welcome the opportunity to comment on these in more detail and, if they are to be pursued, to discuss the potential cross boundary impacts and how these can be mitigated.

As explained elsewhere, the Council is also concerned to ensure that the cumulative impact of the various development opportunities are assessed and include considering cross boundary impacts.

Question 34: SANG issues

Response: The Council would welcome having an on-going dialogue with Guildford Borough to enable consideration of cross boundary SANG issues, including the identification of new or expanded SANG.

Conclusions

Planning for future development in Guildford has the potential to have a significant impact on Waverley. It is essential, therefore, that there is a commitment to continued liaison and, where appropriate, joint working between Guildford and Waverley. This should include the identification of housing and employment needs and the extent to which they have cross boundary implications. It should also include considering the implications for neighbouring authorities arising from the role that Guildford plays as a sub-regional centre for employment, jobs, leisure and shopping. Finally it should include the cross boundary impacts, including impacts on infrastructure, arising from both individual sites and the cumulative impact from the overall amount of growth that Guildford plans for.

Yours sincerely



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