

CABINET
20 SEPTEMBER 2016

HEAD OF PLANNING
REPORT NO PLN1631

Waverley Borough Pre-Submission Draft Local Plan Part 1: Strategy and Sites Consultation

1. Purpose of Decision

- 1.1. This report provides a summary of the content and issues set out in the Waverley Borough Pre-Submission Draft Local Plan Part 1: Strategy and Sites¹ consultation with regard to any cross boundary issues that may impact on Rushmoor Borough. The closing date for submission of comments is 3rd October 2016.

2. Context

- 2.1. Before moving to the detail of the Waverley Local Plan consultation, it is useful to provide some context for Rushmoor's interest in the preparation of the document. The requirement for joint working on strategic planning matters is rooted firmly in national policy, to which all Councils are required to adhere in Local Plan preparation.
- 2.2. Hart, Rushmoor and Surrey Heath Councils form a single [Housing Market Area](#) (HMA), known as the Hart, Rushmoor and Surrey Heath (HRSH) HMA. Waverley Borough Council forms part of the adjoining West Surrey HMA, along with Guildford and Woking Councils. These HMAs are based on key linkages such as cross boundary commuting patterns and migration trends, and focuses on those neighbouring authorities with the strongest links. Whilst there are strong justifications for the authorities to work in these two groups, it is important to acknowledge the close links between these two market areas and the complexity across the wider sub-region.
- 2.3. The [National Planning Policy Framework](#) (NPPF) requires local planning authorities to ensure that their Local Plans together meet the full, objectively assessed needs for market and affordable housing in the HMA within which they fall. Hence, we would expect Waverley to work with its HMA partners in the first instance to meet its housing needs.
- 2.4. These policy requirements in the NPPF, particularly regarding the need for LPAs to work together to deliver outcomes on strategic cross boundary planning issues, are relevant to the preparation of our Local Plans. This includes addressing unmet development needs in neighbouring (HMA) authorities, where reasonable to do so. Effectively, this obligation placed on LPAs under the statutory "duty to cooperate" is a replacement for the strategic planning framework formerly provided by regional plans. Where

¹ The Waverley Borough Pre-Submission Draft Local Plan Part 1: Strategy and Sites, and supporting documentation, can be viewed at www.waverley.gov.uk/localplan

Local Plans do not conform to national policy requirements, they are at significant risk of being found unsound.

- 2.5. In January 2013, Waverley Borough Council submitted a Core Strategy to the Secretary of State for examination. The Core Strategy included a requirement for 5,060 homes between 2006 to 2028, an average of 230 homes per year. This was lower than the South East Plan² housing requirement of 250 homes per year. At that time, Rushmoor Borough Council made a number of comments and raised some objections to the Core Strategy. These are summarised in Appendix 1.
- 2.6. During the examination of the Waverley Core Strategy in 2013, the Inspector raised some concerns regarding the duty to cooperate with neighbouring authorities and meeting housing need. Rushmoor participated in the first day of the public hearing sessions, which focussed on these issues. At the end of the first session the Inspector decided not to continue with the public hearings and wrote to Waverley Borough Council setting out his preliminary view and the Council made the decision to withdraw the Core Strategy.
- 2.7. Since this decision, Waverley Borough Council has been preparing a new Local Plan. However, it is keen to stress that this did not require it to go back to the start of the process and the evidence and consultation undertaken for the Core Strategy has been drawn on in the preparation of the new Local Plan (Part 1).
- 2.8. As part of the preparation of the Rushmoor Local Plan, we published in February 2015 a document, which set out a series of “duty to cooperate frameworks”, identifying potential cross boundary strategic issues, and establishing with whom the Council would need to engage on those issues. This report focuses on the areas of the Waverley Borough Local Plan Pre Submission Draft relevant to these cross boundary issues.

3. Housing

Meeting housing needs

- 3.1. The draft Plan includes Policy ALH1 (The Amount and Location of Housing), which sets out a spatial development strategy for the delivery of housing. This states that the Council will make provision for at least 9,861 net additional homes in the period from 2013 to 2032 (equivalent to at least 519 homes a year). This would meet Waverley Borough’s objectively assessed housing need (OAHN) within its administrative area. It is noted that the requirement set out in the Policy provides no buffer of additional homes. However, it is noted that the policy wording includes the use of ‘at least’ and the Waverley Land Availability Assessment (August 2016) identifies a total supply of 10,069 homes, a surplus of 208 homes over the plan period.

² South East Plan, the regional plan (or Regional Spatial Strategy) for the South East was published in May 2009. The Secretary of State for Communities and Local Government laid a Partial Revocation Order before Parliament and this came into force in 2013, when the majority of the South East Plan (except for Policy NRM6: Thames Basin Heath SPA) was revoked.

- 3.2. As mentioned above, Waverley Borough Council forms part of a HMA with Woking and Guildford Borough Councils. The West Surrey SHMA identified the following OAHN within these authorities:

Guildford	693 homes per year
Waverley	519 homes per year
Woking	517 homes per year

- 3.3. Both Waverley and Guildford Borough Councils are proposing to meet the OAHN for their administrative areas in the latest version of their Local Plans. However, the most up to date plan for Woking is the Core Strategy, which covers the period 2010 to 2027. This Plan seeks to deliver 292 homes per year, which is less than the current identified OAHN and the OAHN identified in the SHMA that existed at the time. The Woking Core Strategy was adopted after the introduction of the NPPF and in reaching its conclusions on the soundness of the Plan the Inspector was mindful of the requirements of the recently introduced NPPF. The three authorities are currently seeking to agree a Statement of Common Ground on housing delivery to explain how the authorities will work together to address housing needs within the HMA.
- 3.4. Waverley Borough Council makes it clear in the supporting documentation that it does not consider that it can sustainably accommodate any unmet need arising from Woking Borough and points out that they have not been formally asked to do so. They consider that the level of growth identified in the Plan represents a considerable step change in delivery compared to previous rates and that they are contributing to a significant boost in housing supply. Rushmoor Borough Council is supportive of Waverley Borough Council's commitment to meet its OAHN within its administrative boundary.

The location of housing

- 3.5. In draft Policy ALH1, each Parish is allocated a number of new homes to accommodate (summarised in Table 1 below). This includes homes already permitted and built since the start of the plan period (April 2013). A summary of the Spatial Strategy is shown on the Key Diagram (Appendix 2).
- 3.6. The amount of housing proposed for Farnham (2,330 homes) has been identified from a number of sources of supply in the Land Availability Assessment (LAA) (August 2016). This includes 1,234 homes identified as committed, consisting of completed units, planning permissions and windfalls³. The remainder (1,096 homes) will be delivered on strategic sites or on other potential housing sites identified in the LAA (2016). The non-strategic housing sites from the LAA (2016) have not been allocated in the Local Plan (Part 1), but will be allocated in the Farnham Neighbourhood Plan or Local Plan (Part 2).

³ Windfall sites are sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously-developed sites that have unexpectedly become available.

Table 1: Summary of Amount and Location of Housing proposed in Policy ALH1 of the Waverley Local Plan (Part 1)

Parish/Location	Number of new homes
Main Settlements	8,520
<i>Consisting of:</i>	
<i>Farnham</i>	<i>2,330</i>
<i>Godalming</i>	<i>1,240</i>
<i>Haslemere</i>	<i>830</i>
<i>Cranleigh</i>	<i>1,520</i>
<i>Dunsfold Aerodrome new settlement</i>	<i>Up to 2,600</i>
Large Villages	700
Smaller Villages	305
Windfall Sites	185
Other Locations⁴	151
Total	9,861

- 3.7. The draft Local Plan allocates nine strategic sites for housing across the Borough (shown on the Key Diagram in Appendix 2). Three of these sites are located in and around Farnham (listed below in Table 2). The potential number of homes identified on these strategic sites, delivers less than half of the 1,096 homes that need to be found in and around Farnham. As noted above, the remaining capacity has been identified on non-strategic housing sites in the LAA (2016) and will be allocated in the Farnham Neighbourhood Plan or Part 2 of the Local Plan. A summary of the locations and expected yields of these sites are shown in Appendix 3.
- 3.8. Rushmoor Borough Council does not have any comments on the sites and is content that none of the sites proposed are within the broad area Waverley Borough Council has identified as being part of the revised Farnham and Aldershot Strategic Gap (discussed later in this report).

Table 2: Strategic Sites allocated for housing in Farnham

Policy	Strategic Site Address	Total Dwellings	Dwellings permitted (as at 1/4/16)	Outstanding Dwellings
SS1	Coxbridge Farm, Farnham	350	0	350
SS2	Green Lane, Badshot Lea, Farnham	100	0	100
SS3	Woolmead, Farnham ⁵	100	45	55

⁴ 151 dwellings have been built or have an outstanding planning permission in areas not listed in Policy.

⁵ A town centre site allocated for a mix of uses including around 100 homes and 4,200 sq m of replacement retail floorspace

- 3.9. As shown in Table 1 above, a significant proportion of the requirement is due to be delivered in the form of a new settlement at Dunsfold Aerodrome, known as Dunsfold Park. Dunsfold Park has operated as an aerodrome since 1942 and is currently used as a private unlicensed airfield and is home to over 100 local businesses. The site is not within the Green Belt or Area of Outstanding Natural Beauty (AONB).
- 3.10. There are some concerns about how certain it is that this site will provide residential development and question whether the proposed quantum of housing is achievable. If the site did not come forward, this could result in either an inability to meet its OAHN or increasing pressure to deliver the shortfall in and around Farnham. However, Rushmoor Borough Council is supportive of the positive stance taken on enabling this site to deliver a significant proportion of its housing requirement and therefore enabling Waverley Borough Council to deliver against its OAHN.

4. Economic Development

Meeting Employment Needs

- 4.1. The draft Plan includes Policy EE1 (New Economic Development) which includes the provision of development for economic growth and meets the needs identified in the Waverley Employment Land Review (ELR) (2016). Rushmoor Borough Council acknowledges the role of the Borough in the Enterprise M3 Local Enterprise Partnership (LEP) Strategic Economic Plan (SEP) and that its economic base is made up predominantly by Small and Medium Enterprises (SME). Its positive approach to meeting employment needs and protecting and enabling employment uses through the Local Plan is supported.
- 4.2. The ELR assesses the Borough's employment floorspace and land requirements based on three scenarios:
- i. Experian – based on the outputs of Experian's employment forecasting model
 - ii. Trend – based on Waverley's historical job levels between 1997 and 2013
 - iii. Economic Strategy Aligned - uses the trend based scenario as its starting point but makes a number of assumptions to better align it with the Waverley Economic Strategy 2015 to 2020.
- 4.3. The ELR concludes that the Economic Strategy Aligned scenario is the most realistic projection of future employment levels and land requirements for the Borough because it takes into account both past trends and future aspirations. The Waverley Economic Strategy sets out a vision to continue current economic prosperity and diversity, while safeguarding and enhancing the attractive character and high quality of life within the borough. This approach supports modest levels of employment growth, at appropriate locations to maintain Waverley's attractive character and high quality of life.

- 4.4. The authority has prepared evidence independently of Guildford and Woking Borough Councils, which are part of the West Surrey Functional Economic Area (FEA). Therefore, it is difficult to determine the extent that employment land needs are being met across the FEA, at this time. Rushmoor Borough Council would welcome working closely with Waverley Borough Council on any cross boundary issues relating to employment needs that arise as we both progress our Local Plans.
- 4.5. The draft Local Plan allocates one strategic site for employment at Water Lane, Farnham. Rushmoor Borough Council supports the allocation of this site and has no site specific comments to make.

Retail and Town Centres

- 4.6. It is noted in the Local Plan that there is a relationship between town centres in Waverley serving the needs of shoppers in neighbouring centres in the area and visa versa. This includes reference made in the Local Plan to the Blackwater Valley, Aldershot and Farnborough Town Centres and Farnborough Gate Retail Park. Rushmoor is supportive of the ambition for Waverley to strengthen its retail offer in its town centres and note that the evidence has identified the need for retail floorspace in order to maintain constant market share. However, it would be helpful if greater clarity is provided on the scale of retail development to be delivered in the main centres to meet these needs.

5. Infrastructure and Transport

- 5.1. The draft Local Plan states that to date, and subject to mitigation, transport studies have not identified any insurmountable constraints on the capacity of the highway network to accommodate the proposed level of growth. It is important to note that both the Waverley and Guildford Local Plans have been progressed on the understanding that improvements will be made to the A3 trunk road within the next Road Investment Strategy (RIS) period for 2020-2025. The evidence to support the Local Plan has also factored in the planned improvements to mitigate the impacts from the development of Wellesley.
- 5.2. Rushmoor Borough Council has reviewed the evidence prepared to support the Local Plan and has had the benefit of an officer meeting with Waverley Borough Council's Transport Planner to discuss this evidence in detail. We are supportive of the range and extent of evidence prepared to support the Local Plan, including joint modelling of the Waverley and Guildford Local Plans. However, some concerns have been raised that the planned improvements identified in the Waverley Strategic Highway Assessment (2016) could result in vehicles re-routing which could have negative cross boundary transport impacts.
- 5.3. Therefore, we have agreed to engage further with Waverley Borough Council and seek to engage with Guildford Borough Council, Hampshire County Council and Surrey County Council to ensure that any potential cross

boundary strategic transport issues arising from development proposed in these areas are appropriately mitigated and to work jointly on enabling these mitigation solutions to be delivered.

6. Gypsies, Travellers and Travelling Showpeople

- 6.1. The draft Plan includes Policy AHN4 (Gypsies, Travellers and Travelling Showpeople Accommodation) which states that provision will be made for Gypsy, Travellers and Travelling Showpeople in accordance with the Waverley Traveller Accommodation Assessment.
- 6.2. A Traveller Accommodation Assessment (TAA) was carried out in 2014 using a common methodology agreed by all Surrey local planning authorities. The TAA and an update to that report in 2016 identifies a need for 11 additional pitches for Gypsies and Travellers and three Travelling Showpeople plots between 2012-2017. Using a compound growth rate of 3% there is a further requirement for 39 pitches for Gypsies and Travellers and three Travelling Showpeople plots from 2017 to 2027.
- 6.3. It is noted that since these reports were undertaken, the definition of a traveller in the Planning Policy for Traveller Sites (PPTS, 2015) has been amended so that persons who have ceased to travel permanently are no longer defined as a Gypsy or Traveller. In the light of this, Waverley Borough Council intend to review the methodology and once new evidence of needs is complete, Part 2 of the Local Plan will identify and allocate sites required to meet these needs.
- 6.4. Rushmoor Borough Council has no comments to make on this issue.

7. Natural Environment

Green Belt Review

- 7.1. 61% of the Borough is within the Green Belt. National planning policy requires that Green Belt boundaries are only amended in exceptional circumstances and that this must be undertaken as part of the Local Plan process. Following advice from the Inspector on the withdrawn Core Strategy, the Council considered it necessary to review its strategy for the delivery of housing and that a Green Belt boundary review was required.
- 7.2. The Green Belt Review (2014) made a number of recommendations, which will inform the proposed changes to the Green Belt in the Local Plan. These included recommendations to remove areas from the Green Belt, designate new areas as Green Belt and the removal of villages within the Green Belt.
- 7.3. One proposed change of relevance to Rushmoor, is for the area of land to the north east of Farnham and around Compton and Badshot Lea to be designated as Green Belt. It considers that this would provide an opportunity for a modest extension of the eastern edge of Farnham, providing a long-term boundary for its long-term containment and would also complement the

existing Green Belt land to the south and east, including Green Belt in Guildford Borough. The area of land to be proposed for designation is shown in Appendix 4.

- 7.4. Rushmoor Borough Council has no comments to make on this issue.

Farnham/Aldershot Strategic Gap

- 7.5. The Farnham/Aldershot Strategic Gap is an existing local policy designation which identifies an area between Farnham, Badshot Lea and Aldershot and has played an important role in preventing the coalescence of Farnham and Aldershot. Waverley Borough Council has commissioned a review⁶ of local landscape designations, such as the Strategic Gap, to inform the Local Plan. This review recommended a much more focussed policy is developed to safeguard the strategically important land separating Farnham and Aldershot.
- 7.6. Waverley Borough Council has decided to defer the changes to the Strategic Gap to Part 2 the Local Plan. In the meantime, the existing defined area and accompanying saved Local Plan Policy C4 will be retained. However, it has given an indication of the broad area they expect to designate in the Local Plan Part 1 (Appendix 5).
- 7.7. Rushmoor Borough Council previously raised an objection to the Waverley Core Strategy, because of concerns about the proposal to review the designation in a subsequent document and that the policies, as worded, potentially left land between Aldershot and Farnham vulnerable. Rushmoor Borough Council is supportive that Waverley Borough Council has since undertaken a review of this designation and we look forward to working with the Authority, during the preparation of Part 2 of the Local Plan, to ensure that the gap between Farnham and Aldershot is protected.

Thames Basin Heath Special Protection Area

- 7.8. It is noted that Waverley Borough Council has recently approved changes to the Thames Basin Heaths Special Protection Area (TBHSPA) Avoidance Strategy. This sets out the Council's approach in seeking to avoid the effect of a net increase in population within 5 km of the SPA, and how it proposes to discharge its legal obligations under the 'Habitats Regulations'⁷. This means providing or contributing towards Suitable Alternative Natural Greenspace (SANG) and contributing towards a programme of Strategic Access Management and Monitoring (SAMM) of the SPA itself.
- 7.9. This review has enabled it to identified sufficient SANG capacity to mitigate the expected number of homes within the 5km buffer zone of the SPA. The accompanying papers also identify a number of options for future SANG. Rushmoor Borough Council is keen to work closely with Waverley Borough

⁶ Waverley Borough Council Landscape Study (2014)

⁷ The Conservation of Habitats and Species Regulations 2010

Council and other adjoining local authorities to explore opportunities for the delivery of shared SANG.

8. Flooding

8.1. Waverley Borough Council has updated the Level 1 Strategic Flood Risk Assessment (SFRA) for the new Local Plan. The application of the sequential test⁸ for Level 1 showed that it was not possible to accommodate all of the OAHN in areas with lower probability of flooding (i.e. EA Flood Zone 1). The Exception Test⁹ can therefore be applied and the Council has commissioned a Level 2 SFRA to assess sites with an element of flood risk. This included an assessment of two sites in Farnham:

- West of Badshot Lea, Farnham
- Coxbridge Farm, Farnham

8.2. It is noted in the assessment of the site in Badshot Lea that there is risk of surface water and sewerage flooding and that the cumulative impact of urban development on the site may increase the risk of surface water flooding. The report makes a number of recommendations and in conclusion both sites were considered to have a relatively low flood risk suitability score. Rushmoor Borough Council supports the recommendations of the Level 2 SFRA in order to prevent cumulative impact of development increasing risk of surface water flooding in this area.

9. Conclusions

9.1. Rushmoor Borough Council is supportive of the strategy set out in the Waverley Borough Pre-Submission Draft Local Plan (Part 1) Strategy and Sites, and looks forward to continuing to work with Waverley as its Local Plan progresses, and to continue to engage in discussions on relevant cross boundary strategic planning issues as work on the new Rushmoor Local Plan evolves.

10. Recommendations

10.1. It is recommended that Cabinet endorse the content of this report as the basis for Rushmoor's response to the Waverley Borough Pre-Submission Draft Local Plan Part 1: Strategy and Sites Consultation.

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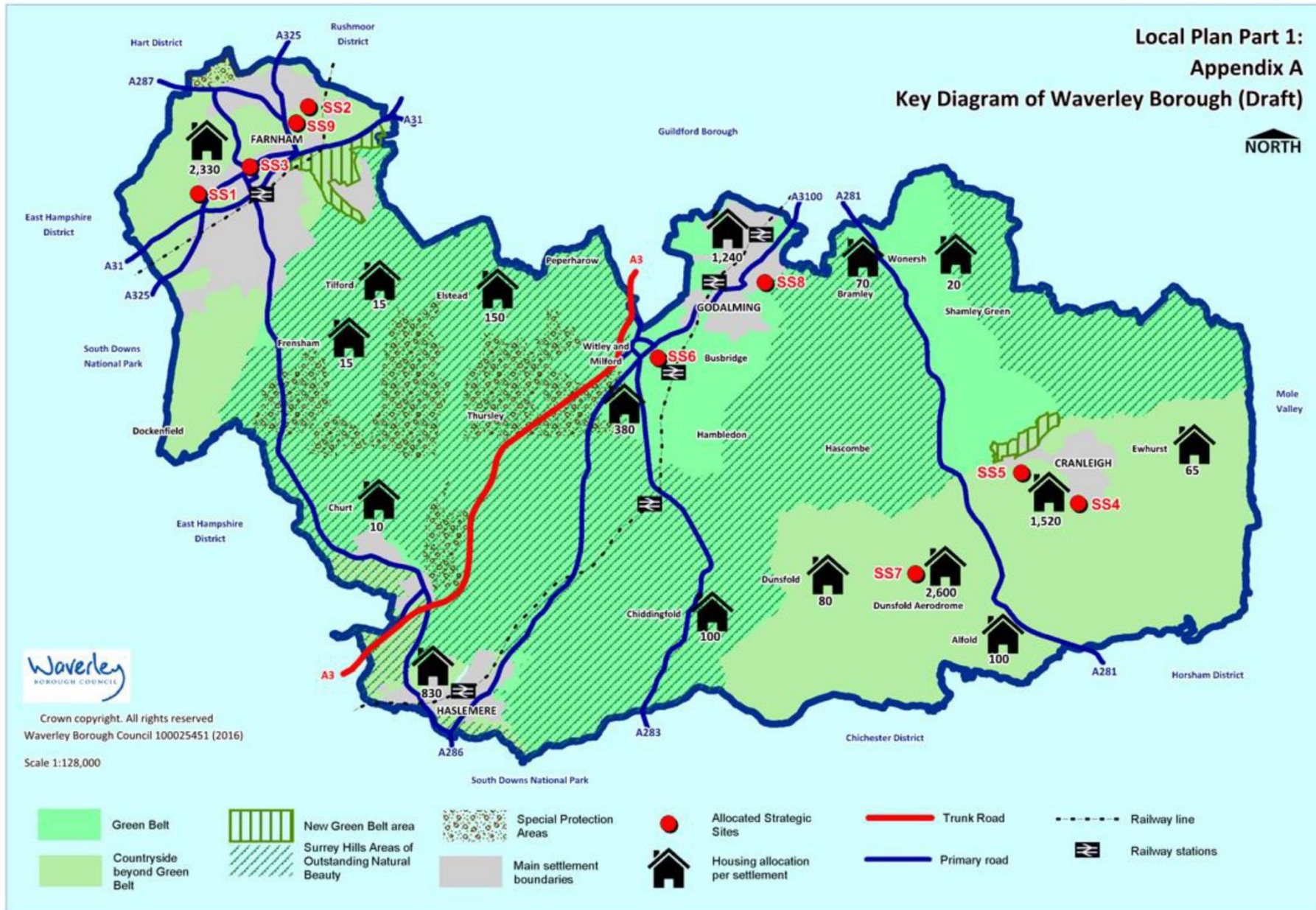
⁸ The aim of the Sequential Test is to steer new development to areas with the lowest probability of flooding. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding (NPPF para 101).

⁹ NPPF para 102

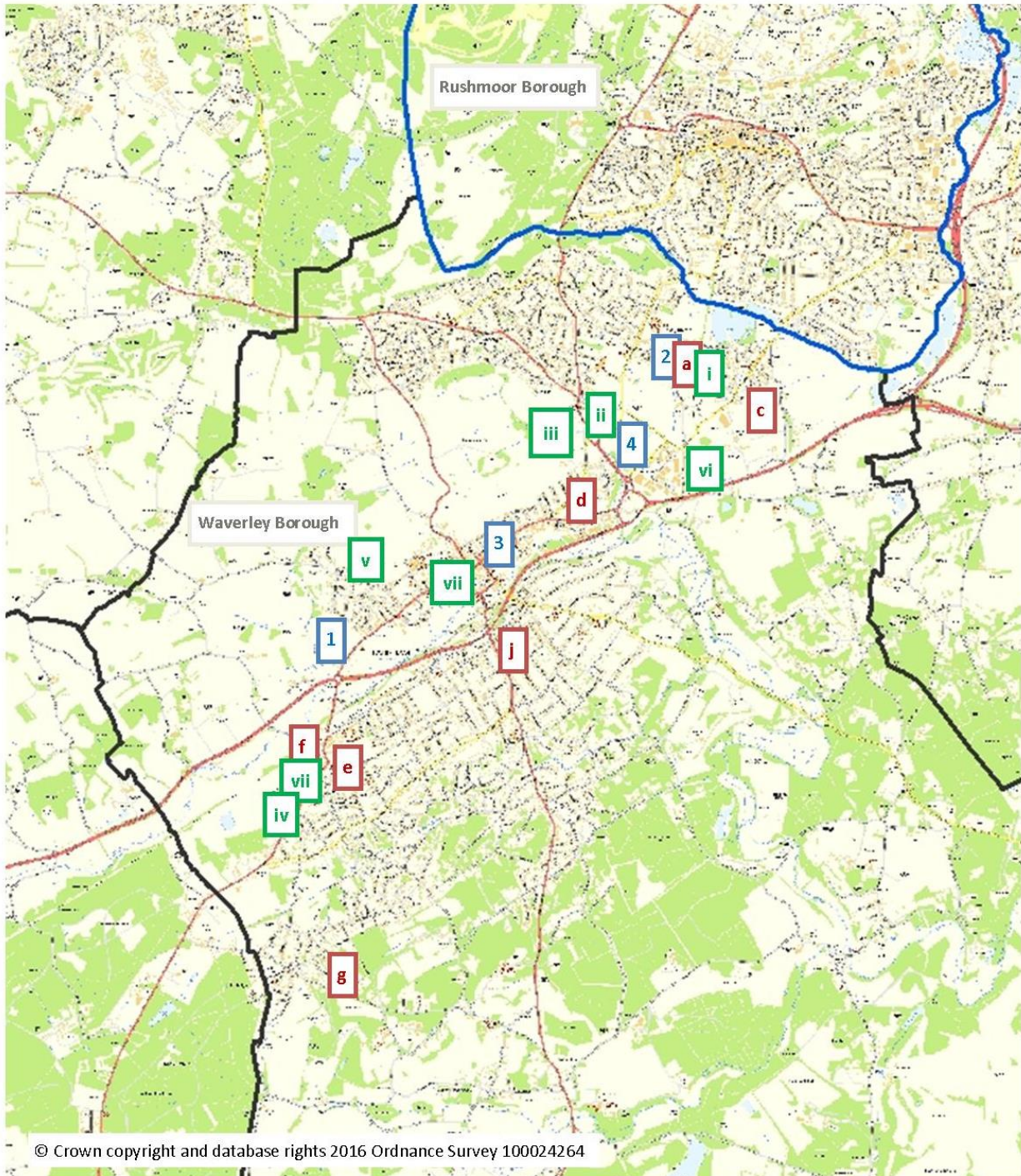
Appendix 1: Summary of objections raised by Rushmoor Borough Council during the Waverley Core Strategy Pre-Submission consultation in 2012.

Policy/Issue	Summary of Comments
Identification/Allocation of Greenfield Sites	The Core Strategy identified a housing supply from greenfield sites, but these were not allocated or shown in the plan. Therefore, we commented we were not able to judge the impact of proposed development around Farnham.
Justification used for setting a housing figure lower than South East Plan requirement	The justification used for setting a low housing figure was that need would be met in neighbouring authorities. This included specific reference to Rushmoor exceeding its South East Plan target figure and the number of homes being delivered at Aldershot Urban Extension (Wellesley). However, this justification was used in the absence of effective dialogue with us and we commented that this excess was required for Rushmoor to meet its own high levels of housing need identified in the Hart, Rushmoor and Surrey Heath Strategic Housing Market Assessment (SHMA).
Thames Basin Heaths Special Protection Area	There was a lack of certainty regarding the ability to mitigate the impact of proposed development on the Thames Basin Heaths Special Protection Area (TBH SPA)
Town Centres/Retail	We were concerned that the Strategy encouraged growth in the town centres, but gave no indication of the scale of this growth. We commented that the current pull on shoppers from Farnborough and Aldershot could be exacerbated if the town centre were to grow beyond anticipate growth in retail expenditure over the plan period.
Farnham and Aldershot Strategic Gap	The Core Strategy stated that the Farnham/Aldershot Strategic Gap would be reviewed at the next stage. We expressed concern that whilst the Strategic Gap was supported by the Core Strategy, the wording leaves the gap vulnerable and it was not clear if the proposed development on greenfield land around Farnham will have an impact on the Gap.

Appendix 2: Key Diagram (Source: Waverley Borough Pre-Submission Draft Local Plan Part 1 - Appendices)



Appendix 3: Location of sites in and around Farnham allocated and/or identified in the Waverley Local Plan (Part 1), Farnham Neighbourhood Plan or Land Availability Assessment (2016).



Sites identified and/or proposed for allocation in and around Farnham:

Strategic Sites proposed for Allocation in Local Plan Part 1

Strategic Housing Sites:

1. Coxbridge Farm - 350 homes
2. Land West of Green Lane - 100 homes

Mixed Use Site:

3. The Woolmead, Farnham - 100 homes and 4,200 sq m of replacement retail floorspace

Employment Site:

4. Water Lane

Sites identified in Farnham Neighbourhood Plan¹⁰

Housing Allocations

- a. Part of SSE Depot, Lower Weybourne Lane and adjoining land - 100 homes
- b. Land west of Green Lane, Badshot Lea (**see no. 2 above**) - 110 homes
- c. Land at Little Acres Nursery and south of Badshot Lea - 125 homes
- d. Land between Hale Road and Guildford Road - 10 homes
- e. Colemans Yard, Wrecclesham Road - 10 homes
- f. Coal Yard, The Street, Wrecclesham Hill - 15 homes
- g. West of Switchback Lane, Rowledge - 10 homes
- h. The Woolmead (East Street) (**see no. 3 above**) - 100 homes
- i. Coxbridge Farm, off Alton Road (**see no. 1 above**) - 350 homes
- j. Part of Farnham College (Tennis Courts) - 15 homes

Business Site Allocation:

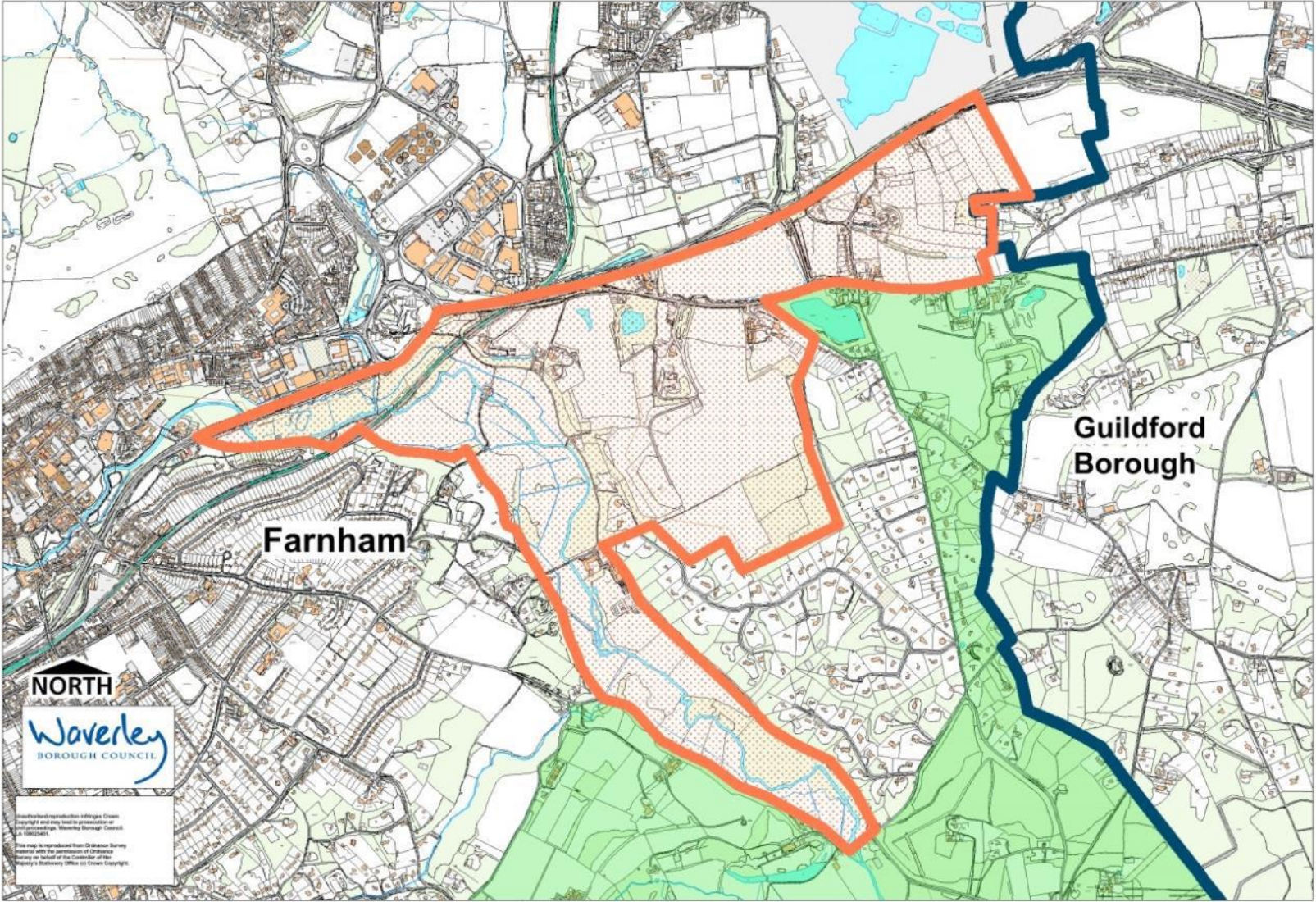
- k. Water Lane (**see no. 4 above**)

Sites identified in the LAA (not including those proposed for allocation in the Local Plan and/or neighbourhood plan)

- i. Land West of Badshot Lea - 90 homes
- ii. Land to the south of Monkton Lane - 56 homes
- iii. Land at Hale Road - 70 homes
- iv. Garden Style, Wrecclesham Hill - 65 homes
- v. Land to the rear of Three Styles Road - 40 homes
- vi. 25-27 Hurlands Close - 10 homes
- vii. Stephenson's Engineering, Wrecclesham Hill - 13 homes
- viii. Town centre sites, including:
 - Victoria House, South Street - 8 homes
 - The Bush Hotel, The Borough - 5 homes
 - 2-3 The Borough - 11 homes

¹⁰ On some of the sites proposed for allocation in the Neighbourhood Plan, the approximate capacity of the site differs from the conclusions of the Waverley Borough Council LAA (2016)

Appendix 4: The Area of Compton, Farnham proposed for designation as Green Belt (Source: Waverley Borough Pre-Submission Draft Local Plan Part 1)



Appendix 5: The Farnham/Aldershot Strategic Gap (Source: Waverley Borough Pre-Submission Draft Local Plan Part 1)

