

Guildford Borough Proposed Submission Local Plan: Strategy and Sites Consultation

1. Purpose of Decision

- 1.1 This report provides a summary of the content and issues set out in the Guildford Borough Proposed Submission Local Plan: 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 18th July 2016. The Council commented previously on the draft Guildford Local Plan in 2014, and this report can be viewed at <http://www.rushmoor.gov.uk/article/7210/Cabinet-meeting---15-September-2014>.

2. Context: National Planning Policy

- 2.1 Before moving to the detail of the Guildford 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. Hart, Rushmoor and Surrey Heath Councils are together defined as a [Housing Market Area](#) (HMA), whilst Guildford, Waverley and Woking Councils are working together in the same way. 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 in the first instance. In addition, there are strong links between our two HMAs.
- 2.2 The [National Planning Policy Framework](#) requires Housing Market Area partners 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 Guildford 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 sub-regional plans. Where Local Plans do not conform to national policy requirements, they are at significant risk of being found unsound.

¹ The Guildford Borough Proposed Submission Local Plan; Strategy and Sites, and supporting documentation, can be viewed at www.guildford.gov.uk/newlocalplan

3. Guildford Borough Proposed Submission Local Plan; Strategy and Sites

- 3.1 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 Guildford Borough Proposed Submission Local Plan relevant to these issues.

4. Housing

Meeting housing needs

- 4.1 The draft Plan sets out at Policy SS2 a spatial development strategy; effectively, what type of development, how much of it, and where will it go. In respect of housing, Policy SS2 plans for 13,860 new homes over the Plan period (2013-2033). This equates to an average of 693 net new dwellings a year, and would meet Guildford Borough’s objectively assessed housing need (OAN) within its administrative area.
- 4.2 The Council considers that, in fact, the Plan will meet the OAN with flexibility. The total potential provision of new homes across the plan period (including completions since 2013 and outstanding capacity) is 15,844. This provides 1,984 homes as a buffer. This is not planned over provision, but rather, flexibility that helps to guard against the policies in the plan becoming out of date by failing to deliver a five-year supply of available housing sites. Guildford Borough Council does however make clear in the supporting documentation that it is unable to help with addressing unmet housing needs from within its own Housing Market Area. Rushmoor Borough Council is supportive of Guildford Borough’s commitment to meet its OAN within its administrative boundary.

The location of housing

- 4.3 In terms of the availability of housing sites, an interesting statistic to note is that 89% of Guildford Borough falls within the Metropolitan Green Belt. The Plan sets out in Policy SS2 a spatial hierarchy, which identifies a brownfield first policy including, where appropriate, previously developed land in the Green Belt. The following spatial options are then considered to be the most sustainable locations:

- Guildford town centre
- Guildford, and Ash and Tongham urban area
- Inset villages
- Identified Green Belt villages
- Rural exception housing
- Countryside beyond the Green Belt
- Guildford urban extensions
- New settlement at the former Wisley airfield
- Development around villages

- 4.4 Guildford Borough contains some “Countryside Beyond the Green Belt”, although this notation covers only 2% of the Borough, and is located in the west of the Borough near Ash and Tongham. Mindful of the hierarchy set out in paragraph 4.3 above, and the need to identify enough land to deliver an average of 693 new dwelling a year, the draft Plan contains several housing allocations that fall on land that is subject to this designation.
- 4.5 Policy A29 is the most significant of these allocations, identifying land for approximately 1200 homes around Ash and Tongham. A map showing the distribution of the sites that comprise this allocation is shown at Appendix 1 of this report. In addition to this, there are two other smaller allocations (A27: Warren Farm, Ash Green and A28: Land to the east of White Lane, Ash Green) of 120 units in total, 629 homes with planning permission (net outstanding) and 124 completions since the base date of 2013. In the wider Ash and Tongham area, taking into account completions, permissions and Local Plan allocations, this equals 2,057 homes to be delivered by 2033.
- 4.6 In terms of any potential cross boundary impacts of this development, whilst it is located close to the boundary with Rushmoor Borough, mindful of the constraints noted above, Guildford Borough Council has very limited opportunities to accommodate its objectively assessed housing need. The draft Plan contains a number of other strategic housing allocations, including land at former Wisley Airfield (2,100 homes), Slyfield Regeneration Project (1,000 homes), Gosden Hill Farm (2,000 homes), and Blackwell Farm (1,800 homes). In addition, there are a number of other allocations of around 100 units. Importantly, the evidence supporting the Plan has had to review the function of land within the Green Belt, and facilitate some land releases from it, in order to achieve the scale of residential development required to meet Guildford’s OAN.
- 4.7 Rushmoor Borough Council is supportive of Guildford’s approach of “leaving no stone unturned” in seeking to meet its housing need. This is positive in as much as it is not asking Rushmoor to help meet its housing needs, and in this respect, at this point in time, both authorities can be said to satisfy the “duty to cooperate” on the cross boundary strategic issue of meeting housing needs.

Infrastructure and transport in relation to land around Ash and Tongham

- 4.8 The Strategic Highway Assessment report (2016) sets out that in respect of the development proposed in the Local Plan, *without any mitigation*, the greatest potential impacts are seen on the network in the vicinity of Ash / Ash Vale and travelling north into the borough of Surrey Heath. Some of the trips in Ash / Ash Vale will join the A331 Blackwater Valley Road to travel further afield, but it is likely that a reasonable proportion will travel into the neighbouring boroughs of Rushmoor and Surrey Heath. Some of these roads already experience congestion, despite the model suggesting that existing traffic flows are relatively low.

- 4.9 Policy I1 (Infrastructure and delivery) of the draft Plan requires the infrastructure needed to support development to be provided and available when first needed to serve the occupants and users of the development. Infrastructure includes parks, green spaces and play areas, roads and other transport, schools, flood defences, sporting and recreational facilities, and medical facilities. Policy I3 deals with sustainable transport for new developments, and seeks to ensure that new developments will contribute to the delivery of an integrated, accessible and safe transport system.
- 4.10 Specifically of interest to the strategic allocation around Ash and Tongham, and in the context of paragraph 4.8 above, further information on key infrastructure projects is provided at Appendix C of the draft Plan, in the Infrastructure Schedule. Infrastructure projects LRN9 through to LRN14 relate to improvements to traffic management and environmental improvements in and around Ash, Ash Vale and Tongham, to be funded through a combination of developer contributions and Enterprise M3 Local Economic Partnership Local Growth Fund awards. For example, the schedule identifies LRN14, which is a junction improvement scheme at the connection of the A331 Blackwater Valley Route with the A31 Hog's Back (Tongham). It is important to note that this mitigation is required to enable the development proposed in the Local Plan to proceed.
- 4.11 In this context, Rushmoor Borough Council is supportive of the planning policy framework and detailed infrastructure projects as they relate to the road network, subject to certainty regarding the delivery of these improvements as part of the overall package of implementation of development in and around Ash, Ash Vale and Tongham.
- 4.12 In addition, PED6 sets out a potential expansion of Ash Grange Primary School if required to provide spaces for the primary age children who will live in the new homes to the south and east of Ash and Tongham. These infrastructure proposals are supported by Rushmoor Council, mindful of the strategic allocation for residential development in and around the settlements of Ash and Tongham.

Countryside

- 4.13 Of relevance to Rushmoor, mindful of the allocations around Ash and Tongham, Policy P3 (Countryside) is predicated on the need to ensure that there is no further encroachment into the countryside designation to the west and south of the urban area of those settlements. It notes specifically that any further proposals for development beyond those permitted and allocated would only be allowed provided they would not lead to a greater physical or visual coalescence between the Ash and Tongham urban area and Aldershot. The reasoned justification supporting Policy P3 states that,

“Any development proposals which compromise the integrity of the gap that separates the Ash and Tongham urban area with neighbouring Aldershot will be resisted.”

- 4.14 In the context of the strategic allocation for residential development on land to the south and east of Ash and Tongham, Rushmoor Borough Council welcomes the inclusion of Policy P3 in the draft Plan, and the recognition of the importance of the gap between the Ash and Tongham urban area and Aldershot.

Green Belt

- 4.15 Policy P2 of the draft Local Plan relates to Green Belt. This notes that whilst some land has been removed from the Green Belt to facilitate residential development to meet identified housing needs, the Green Belt boundary has in fact been extended between Ash Green village and the Ash and Tongham urban area in order to prevent coalescence. Whilst not directly adjoining Rushmoor Borough, it is relevant to note and support this proposed addition to the Green Belt, given the supplementary protection it offers to the green infrastructure surrounding Ash and Tongham in the longer term, once the permissions and allocations for this part of Guildford Borough are built out over the period to 2033.

Other policy considerations relevant to the strategic land allocations

- 4.16 In terms of the detail of the proposed housing allocations around Ash and Tongham, other policies in the draft Plan enable the consideration of relevant planning issues; for example, Policy H1 (Homes for all) requires a mix of housing to be provided to meet a range of accommodation needs. Policy H2 (Affordable homes) requires 40% of new homes to be affordable. Policy P5 relates to the Thames Basin Heaths Special Protection Area (SPA), and would prevent proposals that are not supported by measures to avoid and mitigate the adverse effects on the ecological integrity of the SPA. Policy E9 (Local Centres) supports the role of Local Centres as the focus for meeting everyday shopping and service needs, and includes local parades in Ash and Tongham. The suite of policies used to support the determination of proposals for residential development and associated infrastructure, as set out in the strategic allocations in the draft Plan, is supported.

5. Employment

- 5.1 With regard to other potential cross boundary issues, the draft Local Plan sets out policies that provide a strategy for supporting Guildford Borough's strong and vibrant local economy. It allocates 37,200 – 47,200 sq m of office and research and development floorspace (including a 10 hectare extension to Surrey Research Park), and 4.7 – 5.3 hectares of industrial land. It also seeks to protect existing strategic and locally important employment sites.
- 5.2 Rushmoor Council is supportive of Guildford Borough's approach to protecting and enhancing the employment land offer within its administrative area, particularly as the objectively assessed housing need takes account of the need to facilitate the delivery of new homes to help provide a local pool of economically active workforce. Moreover, this is reflective of the Enterprise M3 LEP's Strategic Economic Plan, and the role that Guildford plays in the

economic well-being of the northern part of the LEP area, within which Rushmoor also falls.

6. Transport

- 6.1 As well as Policy I3, Sustainable transport for new developments, the draft Local Plan is also committed to supporting the Department for Transport's Road Investment Strategy (Policy I2), focusing on improvements to the strategic road network (A3 and M25). The draft Local Plan is supported by the Guildford Borough Transport Strategy 2016, which sets out the strategic and local transport infrastructure required to support the development proposed in the Plan.
- 6.2 Rushmoor Borough Council is supportive of the suite of transport policies and proposals identified through the policy framework in the draft Plan and the Guildford Borough Transport Strategy 2016. It is likely that the benefits of the implementation of these proposals will be felt not only within Guildford Borough, but also more widely, given the sensitivity of the transport network to individual incidents. For example, Policy A26, the mixed use allocation for Blackwell Farm, off the A31, includes a new link road from the A31, through to Surrey Research Park and the Royal Surrey County Hospital. This will be immensely beneficial in terms of relieving congestion on the A31 into Guildford, as this will assist with removing the need for traffic travelling from the west of Guildford to drive in and back out using either the A3 trunk road or via the town when seeking to access the Research Park and the Hospital.
- 6.3 However, in the absence of the implementation of the full suite of transport policies and proposals to support the quantum of development set out in the Local Plan, this would potentially result in negative cross boundary transport impacts, the residual cumulative impacts of which would be severe. In this context, the Council looks forward to continuing to work with Guildford Borough Council on potential cross boundary strategic transport issues, to ensure that those arising from development proposed in the Guildford Local Plan are appropriately mitigated.

7. Retail

- 7.1 The focus for retail and service provision is centred on Guildford itself. Policy E7 (Guildford Town Centre) includes the delivery by 2033 of a new retail-led mixed use development of 45,000 sq m (gross) of additional comparison goods floorspace on the North Street regeneration site. Moreover, the policy supports the delivery of a mix of other town centre uses such as food and drink establishments, cinemas and gyms, active use of the riverside, and around 1,172 new homes.
- 7.2 The policy contained in the draft Plan is in keeping with the role of Guildford as the Borough's main town centre, and the scale of development is commensurate with this role. Rushmoor Borough Council recognises that it is an appropriate scale of future growth for Guildford.

8. Gypsies and Travellers

- 8.1 Policy S2 (Borough Wide Strategy) contains reference to the identification of 43 permanent pitches for Gypsies and Travellers and 6 permanent plots for Travelling Showpeople within Guildford Borough by 2017. A requirement for additional pitches and plots beyond 2017 is also recognised.
- 8.2 Guildford Borough Council is committed to meeting its identified needs for travellers within its administrative boundary in the first instance, which is important to Rushmoor Borough mindful of the fact that even though our Boroughs adjoin, we are cited in a different County. It is noted that in order to meet these needs, as well as some individual site allocations, such as at Sendmarsh and Effingham, the draft Plan requires in Policy H1 (Homes for all) that traveller accommodation should be provided on development sites of 500 homes or more. However, on land around Ash and Tongham, the individual housing sites that together comprise the allocation are individually less than 500 units, hence the policy requirement to provide traveller sites will not apply in this location. In this context, Rushmoor is supportive of the policy approach to planning for travellers as set out in the draft Local Plan.

9. Conclusions

- 9.1 Rushmoor Borough Council is supportive of the strategy set out in the Guildford Borough Proposed Submission Local Plan: strategy and sites document of June 2016. We look forward to continuing to work with Guildford 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 Guildford Borough Proposed Submission Local Plan; Strategy and Sites consultation.**

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Appendix 1: map showing Policy A29, Land to the south and east of Ash and Tongham (not to scale, taken from Guildford Borough Proposed Submission Local Plan, June 2016)

