



**Waverley BC Local Plan Part 1 Consultation**

**Wonersh Parish Council Response**

**Strategic Housing Market Assessment (SHMA)**

1. Wonersh Parish Council (WPC) acknowledges the number of new homes of 8,450 houses (470 per annum) proposed in the SHMA report (prepared by the independent consultants, G L Hearn) but recognises that this number is still subject to detailed and rigorous examination with regard to number, allocation across the Borough and sustainable delivery. We note that this is in the middle of the range set out in the report but question why Waverley Borough Council (WBC) did not take as its starting point the minimum 6,900 houses (385 per annum) – see para 8.20 on page 123.
2. Waverley is a unique borough in that it has four urban centres: the three largest Farnham, Godalming & Haslemere in the north and west of the Borough with Cranleigh, the smallest, in the south east. It also has a widely distributed rural population.
3. The report examines at some length the geographical distribution of housing need, both for new market housing and *Affordable Housing*. In both cases there is a clearly identified need for greater numbers of new houses around two of the main settlements by population, Farnham and Godalming.
4. Farnham and Godalming are also identified as the main settlements for employment in the Borough.
5. WPC accepts that there are constraints on available land for housing around Farnham & Godalming. This has led to the proposal for a greater number of houses being considered around Cranleigh where similar constraints are not in place. We question the sustainability of this approach.
6. The number of new houses proposed around the two settlements of Farnham and Godalming has implications for the delivery of *Affordable Housing* required to satisfy the need identified in the report in these areas.
7. The report identifies that the Housing Market Area within which the majority of residents will move for both social and economic purposes is Waverley/Guildford/Woking. There is also evidence that there is considerable interaction between South and North Hampshire and Blackwater Valley. All these areas are from the west to the north of the Borough.
8. Job density in the Borough is below the Surrey average reflecting the influence of London and to a lesser degree, Guildford, and indicating that Borough residents travel north of the Borough for employment.

9. WPC strongly supports the requirement to build houses in the areas of demand. It is not sustainable to plan to meet housing demand in the north and west of the borough by building in locations around and to the south and east of the Borough.

### **Strategic Housing Land Availability Assessment (SHLAA)**

10. WPC accepts the SHLAA report and agrees with the outcome of the assessments of sites available for housing of five or more dwellings within Wonersh Parish. Considerable work identifying potential sites for *Affordable Housing* within the Parish was undertaken in 2013 and we have not been able to identify any other sites suitable for 5 or more houses. All sites are known to, and have been assessed by, WBC.

### **Green Belt Review**

11. In principle WPC is against the removal of land from the Green Belt unless very special circumstances can be clearly demonstrated.
12. WPC strongly supports the premise that new housing should be provided as close to existing services and amenities as possible to ensure that such housing is sustainable in the long term and therefore accepts the assessment of the removal from the Green Belt of land immediately adjacent to the main settlement of Godalming (including Farncombe and Binscombe).
13. WPC strongly believes that the Green Belt has clearly helped to protect the basic settlement pattern across the Borough, maintaining the separation between the principal settlements and the surrounding network of villages and hamlets and contributed to the special characteristics associated with the Borough.
14. Similarly WPC believes that the existing settlement boundaries around the villages in the Parish have helped to maintain separation of the villages and have protected the countryside from encroachment both within the Parish and with the neighbouring parishes of Cranleigh, Bramley, Shalford and St Martha's (Chilworth). WPC strongly believes that potential development in Shalford and Chilworth in Guildford Borough will impact negatively on the transport network and the availability of services for residents of this Parish and that such developments should be taken into account when assessing the sustainability of potential new housing allocated to the villages such as ours closest to the boundary with Guildford Borough. WPC would urge that WBC work, and coordinate, with Guildford Borough Council (GBC) regarding the Green Belt review.
15. WPC opposes the proposal to alter the settlement boundary of Wonersh village by enclosing land to the south east of Barnett Lane on the following grounds:
  - There is a strong visual landscape connection from Chinthurst Hill across Wonersh Common to Barnett Hill which would be damaged by development on the lower slopes of Barnett Hill especially from existing public footpaths.

- Land to the south east of Barnett Lane was assessed as ‘Poor’ by WBC as part of an assessment report for the suitability of *Affordable Housing* due primarily to access issues and that development on the part of the site nearest to Barnett Lane would “stick out” and not form part of the building line. In addition WPC is concerned that natural drainage would be impaired by development here leading to increased flood risk.
- Wonersh is ranked 19 in Waverley’s Settlement Hierarchy, i.e. in band 4 (rural communities with very limited services). WPC believes that introducing the potential for significant development would thus not appear to be sustainable.
- The land proposed is currently in the AGLV and has been recommended to be included within the AONB designation. This is currently part of an assessment by Natural England to review the AONB boundary. WPC strongly supports this recommendation.

### **Consultation on Potential Housing Scenarios and Other Issues for the Waverley Local Plan**

16. WPC believes that preserving the special character of Waverley should be an objective of the Plan and look forward to receiving WBC’s *Vision* for the long-term development of the four main settlements.
17. WPC believes that new housing should be concentrated in the areas of the borough where demand has been identified. If this is not done then this demand will remain unmet, thereby failing to meet the objective of the Plan.
18. WPC strongly believes that housing development in the Borough should be proportionate to the identified demand. The emphasis of the consultation document focuses on how to accommodate total housing numbers identified in the SHMA across the borough, rather than to identify the regional differences in demand within the borough. This would support mitigation of the SHMA projections.
19. The four scenarios proposed do not reflect the housing requirement across Waverley established in the SHMA. The constraints on available land for housing around Farnham & particularly around Godalming, have led to greater numbers being considered around Cranleigh and Dunsfold. As stated above work patterns around both Farnham & Godalming were identified as being principally either within the towns themselves or towards Guildford & Woking. WPC believe that significant additional housing around the Cranleigh area will be unsustainable. Transport networks (both road and rail) throughout the borough are principally focused radially towards/away from Guildford and London. Adequate south-east/north-west transport links do not exist and there is no evidence in the document that suitable transport links can, or will, be provided.
20. WPC suggests that the rural nature of most of Waverley will be eroded by the four scenarios suggested. WPC accepts and supports that new housing, and particularly *Affordable Housing*, is required in the villages to ensure that village communities remain dynamic. WPC believes that current housing needs are met in our parish other than the need for affordable housing. WPC has already

identified that approximately 11 units are required. WPC is awaiting the development of identified brownfield sites within the Parish before assessing how far that requirement for *Affordable Housing* remains unsatisfied.

21. WPC accepts that large-scale provision of housing around the four main settlements with or without housing on Dunsfold aerodrome means less pressure on the rural villages and the opportunity to concentrate infrastructure resources in those areas.
22. However WPC is concerned that a previous planning application for significant housing on Dunsfold aerodrome was rejected by the Planning Inspector & Secretary of State due to the inadequacy of the road infrastructure around the site. WPC considers that no such development should go ahead until it is assured that acceptable infrastructure is in place particularly with regard to transport systems.
23. WPC does not understand how housing development at Dunsfold meets the borough regional demand already identified.

## **Infrastructure**

24. WPC believes that infrastructure provision is a fundamental part of the decision making process when assessing the housing scenarios. The lack of information, in particular the impact of each scenario on transport, both road and rail, makes it difficult to support a particular scenario selection.
25. WPC believes that the Strategic Transport assessment is clear that all scenarios would significantly increase road trips. Unfortunately the scenarios in this study do not exactly match those in the consultation but there is sufficient information to make reasonable conclusions. WPC believes that the impact for all four scenarios, given our lack of east-west road and rail networks, will put significant extra pressure on the north-south road and rail routes.
26. WPC is concerned that all transport movements associated with new housing around the Cranleigh/Dunsfold area will take place on the road network as no rail network serves this area.
27. WPC is concerned that the Highways Agency, Network Rail, South West Trains, UK Power Networks, Surrey Fire & Rescue Service and Surrey County Council Education have not responded to the April 2014 Infrastructure Consultation. WPC believes that the impact on all aspects of infrastructure needs to be considered in order to make any realistic assessment of the four scenarios.
28. Wonersh Parish is particularly affected by developments proposed in the Local Plan for Guildford Borough where it borders this Parish. It is essential that WBC and GBC work together to assess and deliver necessary infrastructure needs close to their shared boundaries. They need to recognise the existing constraints imposed on the road network through this parish, particularly the B2128 which is already overloaded at peak times.
29. WPC does accept that infrastructure impacts may be more easily overcome when additional housing is concentrated in larger developments.

30. WPC supports the premise that increasing the density of developments both in and around the main settlements and within the villages will minimise the amount of Greenfield land required for new housing.
31. WPC supports the requirement for smaller units of housing in order to address the demands of both an increasingly older population and those requiring first-time buyer type homes and to ensure a sufficient labour supply for economic and employment growth and to service infrastructure expanded to address additional development.

### **Local Designations**

32. WPC believe that until the Natural England review of AONB boundaries is concluded that all AGLV is treated as though it were AONB because of the strong likelihood that some AGLV will be recommended for inclusion in the AONB. WPC support the recommendations of the Surrey Hills report.

## **Responses to Feedback Questions**

- 1) Scope for increase within boundaries – strongly agree
- 2) Scope for increase on edge of main settlements – strongly agree
- 3) Scope on edges of villages settlements – strongly disagree
- 4) Rural brownfield sites – strongly agree
- 5) Dunsfold – neither agree or disagree (see our observations above)
- 6) Green Belt changes are appropriate – slightly disagree
- 7) No use of AONB – strongly agree
- 8) Keep AGLV – strongly agree
- 9) Local designations to be kept – neither agree nor disagree
- 10) Approach re travellers appropriate – slightly agree
- 11) Protection of employment land – agree (We want to protect the amount of such land but it needs to be in the right locations within the borough)
- 12) Please see our detailed comments above
- 13) Please see our detailed comments above
- 14) Please see our detailed comments above

**Wonersh Parish Council**

**9 October 2014**

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