

WONERSH PARISH COUNCIL

RESPONSE TO WAVERLEY BOROUGH PRE-SUBMISSION LOCAL PLAN

1) INTRODUCTION

Wonersh Parish Council welcomes the opportunity to comment on the Pre-Submission Local Plan (“the Plan”). We are making our submission taking into account the views of residents made via questionnaire following an information giving public meeting in the parish.

We appreciate that the development of the Plan to this stage has taken a great deal of work by the Planning Department, Waverley Councillors and others. In places we have raised objections to elements of the Plan. That is not intended to be unhelpful but is intended to make clear our views. Where possible we have tried to indicate how we believe the Plan should be amended.

2) SPATIAL VISION

The Spatial vision appears to be broadly appropriate. However we have two concerns. First the Spatial Vision should be a high level view and should not include specific outcomes such as the proposed new settlement of 2,600 homes at Dunsfold (see 11 below). Any such proposals should be judged against the Spatial vision rather than included within it.

Second the figure of 9861 homes used as the objectively assessed need has been seriously questioned in a report by Neil McDonald. We urge Waverley Borough Council (“WBC”) to ensure that the SHMA figure used in the Plan is up to date and robust. Whilst recognising the need for more housing, many of our residents questioned the validity of this figure.

In addition we do not believe that some of the more detailed proposals in the Local Plan, such as the developments in Cranleigh, fit the stated Spatial Vision.

3) LOCAL PLAN OBJECTIVES

We object to WBC’s commitment to support delivery of at least 9861 homes by 2032 to include some 2600 homes at Dunsfold. In our view, without major investment in transport infrastructure, this settlement would be unsustainable (see 11 below). There are no proposals within the Plan for consideration of any major transport infrastructure developments. On this basis we cannot see how building 2,600 homes at Dunsfold can be made sustainable. The majority of comments from residents expressed concern regarding the inadequate road structure and the lack of information as to how this would be addressed.

Given that other alternatives as explained in the Sustainability Assessment have been discarded, logically, WBC should limit its objectively assessed housing need on the basis that meeting the figure of 9861 homes is unsustainable. It would appear that such an approach would be within paragraph 14 of the NPPF.

4) SPATIAL STRATEGY

We object to the inclusion of Cranleigh in the same category as Farnham, Godalming and Haslemere. The key difference between Cranleigh and the other main settlements is that it does not enjoy ready access to good rail and road networks nor is there an abundance of employment in this area. Although this is acknowledged in the Plan and the Sustainability Assessment, in our view, these key differences have not been given sufficient weight and accordingly risks the Plan being unsound. For this reason, residents believe that housing would be more appropriately built near stations such as Witley and Milford. Again residents are very concerned about the increased strain on the already overcrowded roads.

We support the redevelopment of suitable brownfield sites for housing. However we do not believe that the Dunsfold site is suitable without significant investment in transport infrastructure.

5) AMOUNT AND LOCATION OF HOUSING

We object strongly to the proposal to locate some 4,120 homes (48%) out of the 8520 located in the main settlements in and around Cranleigh including Dunsfold. As acknowledged elsewhere in the Plan the main areas of employment, entertainment and transport links are in Farnham, Godalming and Haslemere. It is a major weakness of the Plan that so many houses are to be built in areas which will inevitably mean that the residents have to travel by car on inadequate roads in order to access jobs, schools, transport and entertainment. This appears to be contrary to paragraph 34 of the NPPF which as set out in the Sustainable Transport section requires "developments that generate significant movement are located where the need to travel will be minimised". The difficulties of meeting the target of 9861 homes inevitably lead to the conclusion that the number needs to be reduced.

6) SUSTAINABLE TRANSPORT

We have no comments on Policy ST1. However as noted above it appears that the proposals concerning Cranleigh and Dunsfold directly conflict with paragraph 1 of ST1 which requires development schemes "are located where it is accessible by forms of travel other than the private car".

7) INFRASTRUCTURE AND COMMUNITY SERVICES.

We and our residents have concerns about the assessment of need with regard to health and education. Local Secondary schools are close to capacity and yet no consideration has been given to where the pupils from the proposed schools on the Dunsfold site would go for secondary education. Concerning educational facilities, there is an anxiety from residents that not enough weight has been given to the provision of 6th form facilities.

With regard to health it is important that the Guildford and Waverley Clinical Commissioning Group is consulted for both primary care and acute hospital care. With an ageing population, provision must include suitable care and nursing homes. The GP system is already under considerable strain.

Concerning educational facilities, there is an anxiety from residents that not enough weight has been given to the provision of 6th form facilities.

8) AFFORDABLE HOUSING

We support Policy AHN1, AHN2 and AHN3. In particular we welcome the 30% affordable housing requirement on developments of 6 houses or more in rural areas. We would also hope that policy AHN3 could be used to encourage the building of smaller houses even in developments which are below the affordable housing threshold. However, many of our residents queried the lack of definition of affordable housing.

9) TOWN CENTRES AND SHOPPING

We strongly support Policy TCS2 and TCS3 which support local retail centres such as Bramley and Neighbourhood and Village Shops.

10) RURAL ENVIRONMENT

Although Wonersh Parish is not directly affected by the proposed changes to the Green Belt we are concerned that the proposals, particularly given the extent of changes to be addressed in the Local Plan Part 2, undermine the integrity of the Green Belt. We welcome the proposed addition to the Green Belt of land to the north of Cranleigh.

We note consideration of settlement boundaries in Wonersh inter alia will be addressed in the Local Plan Part2. At this stage we would like you to note our views on this as set out in paragraph 15 of our response dated 9 October 2014 to the WBC Local Plan Part1 Consultation

11) TOWNSCAPE & DESIGN

We support Policy TD1 and Policy TD2

12) HERITAGE ASSETS

We support Policy HA1

13) STRATEGIC SITES

We object to the inclusion of Dunsfold Aerodrome as a Strategic Site within the Plan.

- A very similar scheme was considered “unsustainable “ by the Inspector and Secretary of State in 2009.
- Since then there have been no developments to make the site any more sustainable.
- The site has in fact become less sustainable as more housing has been and is planned for Cranleigh which will broadly use the same road network .
- Consideration needs to be given to proposed developments around Horsham and Guildford which will all adversely impact the existing overcrowded road network.
- The conclusions of the Mott Macdonald report have been seriously questioned by Vision Transport and SCC highways have raised significant issues.
- In our view and as supported by Vision Transport the residual cumulative impacts of the development on transport will be severe.
- We do not agree that this is a detailed issue which can be addressed at the planning application stage as set out in paragraph 3.3.1 of the Sustainability assessment.

- There does not appear to have been sufficient consideration of other infrastructure issues such as provision of senior school places.
- We do not agree that minor improvements to road junctions along the A281 can somehow make the site sustainable

The Plan is seriously flawed as no attempt is made to address the issue of unsustainability. It is completely unsatisfactory to suggest that this fundamental point can in some way be addressed during the planning application process.

We agree that Dunsfold does have some attractions as a development site. In particular it is at least broadly "brownfield". However we could only support the development if some serious proposals were to be put in place to make it less car dependant. We understand the difficulties but feel that if Waverley wants to include the site within the Local Plan it should explore visionary options. A serious commitment to finding a solution would no doubt assess options such as utilising the Downs Link for train/tram or building a new link to the A3. We feel sure that other options would also develop as the work progressed. Any such strategic plans could have the added benefit that residents throughout the borough would benefit from the development. If it is concluded that such infrastructure developments are not possible then the site is and will remain unsustainable and should be dropped from the Plan.

12) CONCLUSION

Although there is much to commend in the Plan our principle objection concerns the inclusion of Dunsfold Aerodrome in the Plan before the issues of sustainability have been properly addressed. We appreciate that this is a significant undertaking .It may be that the best course for WBC would be to develop a Local Plan for say 10 years without including Dunsfold within it. WBC could then work on the issues of sustainability and either bring Dunsfold forward with a fully thought through and committed plan or if necessary propose alternative sites.