

Barbara Childs
Spatial Planning Manager
Horsham District Council
Park North,
North Street,
Horsham,
West Sussex
RH12 1RL.

Matthew Evans
Head of Planning Services

When calling please ask for: Graham Parrott

Direct line: 01483 523472

Calls may be recorded for training or monitoring

E-mail: graham.parrott@waverley.gov.uk

Your ref:

Our ref:

Date: 22nd March 2012

Dear Ms Childs

Consultation on the Waverley Borough Core Strategy Revised Preferred Options and Draft Policies
Cross boundary issues

As you know, Waverley Borough Council is currently consulting on a revised draft Core Strategy. Having regard to the new Duty to Co-operate, I am particularly keen to receive your comments on the draft Core Strategy and any cross-boundary implications for your Authority.

I am, therefore, writing to each neighbouring Authority to ensure that we are aware of all relevant cross-boundary issues and so that we can ensure that our Core Strategy is not inconsistent with the strategies of our neighbours.

Context

By way of background, the main issues for our Core Strategy are the overall number of new homes that we are planning for and, broadly, where these should go. You may recall that early last year we consulted on our first Core Strategy Preferred Options and Draft Policies. That Core Strategy was prepared in the context of the then revoked South East Plan and followed a specific consultation on the number of new homes for Waverley.

The Council adopted a capacity-based housing target of delivering 2,591 new homes between 2010 and 2027. Taken together with the number of new homes completed in the period 2006 to 2010, that was equivalent to delivering about 180 homes a year in the South East Plan period.

For various reasons, including emerging national policy, the Council has reviewed the housing target and in the latest draft Core Strategy it is proposing a target of 230 dwellings a year. This is the South East Plan 'Option 1' figure (i.e. the number included in the submitted South East Plan before the Secretary of State increased the annual target to 250 a year). In order to deliver this housing, our proposed strategy includes

selected greenfield releases around the main settlements on land that is not within the Green Belt, the AONB or the designated Area of Great Landscape Value.

Cross boundary issues

I understand that the original Horsham Core Strategy 2007 includes an annual housing target of 622 dwellings. I also understand that this annual target was increased to 650 dwellings in the South East Plan 2009.

Since then, I understand that you consulted on a review of the Core Strategy in 2009. That review included consultation on a number of potential strategic housing sites. Most recently, you have consulted on some options for the amount of new housing needed in Horsham District. I understand that the options range from 590 homes a year to 730 homes a year. From the consultation material, it appears that the lowest figure of 590 a year would meet expected population growth and limited job growth. The other options are linked to an increasing amount of job growth.

Questions

Having regard to the above, I would welcome your comments in response to the following questions:-

1. Do you have any comments on the Waverley Core Strategy in terms of potential cross-boundary impacts for Horsham District? If so, do you have any comments on changes/additions that need to be made to the Plan to deal with these?
2. In terms of the current adopted Horsham Core Strategy, what evidence is there that considers the potential cross-boundary impacts, particularly on infrastructure and services, arising both from the overall amount of development planned for Horsham as well as any specific strategic sites, such as Broadbridge Heath?
3. What evidence is currently available in terms of the need/demand for housing and employment, and does this consider cross boundary issues in terms of travel to work and migration patterns?
4. When do you expect to decide on the preferred approach both in terms of the overall housing target as well as the broad distribution of new homes in Horsham District?
5. What additional evidence is being prepared or is planned to consider the potential cross-boundary impacts on infrastructure and services arising from any changes to the housing target and/or the broad distribution of housing? When is this evidence likely to be available?
6. Are you planning to produce any additional evidence to assess housing and employment need/demand? If so, when is this likely to be available?
7. Are there any other major site specific proposals/allocations envisaged in Horsham District that could have cross-boundary impacts for Waverley? If so, what work has been carried out to assess the cross boundary implications for infrastructure and services?
8. Are there any other strategic planning issues that you consider merit closer working/co-operation between Waverley and Horsham District?
9. Has your authority identified any particular governance procedures for dealing with the Duty to Co-operate?

I look forward to hearing from you. As you know, the deadline for responses to the Core Strategy consultation is 11th April 2012.

Yours sincerely

Graham Parrott
Planning Policy Manager

Consultation on the Waverley Borough Core Strategy Revised Preferred Options and Draft Policies.

Cross Boundary Issues

Questions answered by HDC:

1. Do you have any comments on the Waverley Core Strategy in terms of potential cross-boundary impacts for Horsham District? If so, do you have any comments on changes/additions that need to be made to the Plan to deal with these?

We are mindful of any development which could have a negative impact on our transport corridors by way of increased congestion. Noting that you intend to locate the majority of your new housing on the edge of existing centres, further development at Cranleigh could impact roads in the north western portion of our District. We therefore request that you keep both ourselves and WSCC as highways authority informed of any development proposals in this location.

In addition, we note the proposed planned growth at Dunsfold Park. Whilst this is outside the Gatwick Diamond area, there could be implications for our District, therefore we ask to be closely informed of any development proposals in this location.

Finally we are in the process of preparing our Green Infrastructure strategy which may result in the identification of projects that span local authority boundaries. If this is the case we would be interested in working together with Waverley on projects which are mutually beneficial in terms of providing the multifunctional services available through the provision of green infrastructure.

2. In terms of the current adopted Horsham Core Strategy, what evidence is there that considers the potential cross-boundary impacts, particularly on infrastructure and services, arising both from the overall amount of development planned for Horsham as well as any specific strategic sites, such as Broadbridge Heath?

The West Sussex Structure Plan identified the western side of Crawley as a Strategic Development Location to locate up to 2,500 dwellings and associated uses and infrastructure. The area of study, which includes all the land to the west and north west of Crawley, is predominately within Horsham District Council's administrative area; however, it is adjacent to Crawley Borough Council's boundary. As a consequence of the implications of delivery of the Strategic Development Location for both authorities, the two Councils worked together to produce a Joint Area Action Plan (JAAP) for the site. Details on the West of Bewbush JAAP are available here:

http://www.horsham.gov.uk/environment/planning_policy/14203.aspx

3. What evidence is currently available in terms of the need/demand for housing and employment, and does this consider cross boundary issues in terms of travel to work and mitigation patterns?

A county wide Strategic Housing Market Assessment was commissioned in 2008 to provide local authorities with a better understanding of sub-regional housing markets and a robust evidence base on which to base housing policies. Two housing market areas were identified, with Horsham falling in the Northern West Sussex Housing Market area containing four local authority areas: Arun, Adur, Chichester and Worthing. The assessments considered housing need together with commuting patterns and migration. Details on the SHMA are available via the WSCC website at

<http://www.westsussex.gov.uk/default.aspx?page=9902> .

In 2010 the council commissioned a Locally Generated Needs study to gain a better understanding of the level of housing growth we should be delivering through the review of the existing Core Strategy, 2007. The study considers the dynamics of the housing market and economy and develops a number of scenarios for future levels of housing growth. The study was later updated in 2011 to take account of the recent changes in planning policy.

The Locally Generated Needs Study 2011 Update considers a range of factors which could influence housing need and demand locally and Internal Migration Flows and travel to work patterns from surrounding authorities are included within these considerations. A copy of the LGNS 2011 is available on our website at http://www.horshamdistrictldf.info/Files/LGNS_Update_Jan2012.pdf.

The council also commissioned an Affordable Housing Viability Survey in August 2011 to inform the work being undertaken on the review of the exiting Core Strategy. Again this study is available on our website at <http://www.horshamdistrictldf.info/Files/AffordableHousingViabilityStudy2010.pdf>

In 2005 Atkins consultants were commissioned to undertake a joint Employment Land Review for Horsham District Council (HDC), Crawley Borough Council (CBC) and Mid Sussex District Council in order to assess the current provision and potential demand for future employment provision in the Gatwick sub-region. This study was updated by GL Hearn in Spring 2009 and again in October 2010 to feed into the preparation of the forthcoming Horsham District Planning Framework (HDPF). Details of the initial ELR produced in support of the Core Strategy, 2007 are available on our website via http://www.horshamdistrictldf.info/LDDS/local_dev_documents_4503.asp whilst details on the ELR Update are available at http://www.horshamdistrictldf.info/LDDS/local_dev_documents_4650.asp

A Retail Needs Study was undertaken in June 2010 again to inform preparation of the Core Strategy Review (now known as the Horsham District Planning Framework). This study considers future housing growth in the District to ensure future need is planned for and met. The report considers the Districts sub-regional position, having regard to the retail offer in surrounding areas. Cross boundary issues are considered in terms of travel patterns and zone of influence. A copy of this report is available on our website at http://www.horshamdistrictldf.info/Files/HorshamRNS_June10.pdf.

4. When do you expect to decide on the preferred approach both in terms of the overall housing target as well as the broad distribution of new homes in Horsham District?

The council will consult on the preferred approach to housing growth in the Preferred Strategy which is scheduled for consultation in autumn 2012. Responses from the current consultation on housing numbers, together with comments from the 2009 consultation and any further work undertaken in the interim will feed into the preparation of this document before a preferred level of housing growth can be set. The preferred strategy will identify a potential site(s) for future strategic development throughout the District. An indication of the number of strategic sites needed for different levels of housing growth can be seen in the current consultation document.

5. What additional evidence is being prepared or is planned to consider the potential cross-boundary impacts on infrastructure and services arising from any changes to the housing target and/or the broad distribution of housing? When is this evidence likely to be available?

The District worked with NLP consultants to produce an Infrastructure Study which considers the capacity of infrastructure and services to cope with future development. The document identified areas of concern and tipping points which have been considered through the preparation of our development plan. The Infrastructure Plan was published in May 2010 and is available to view and download on our website here;

http://www.horshamdistrictldf.info/Files/HorshamInfrastructureStudy_May10.pdf

The council also commissioned a Water Cycle Study which considered the impact of development in the Gatwick Diamond area on water supply, water treatment and water resource management. This considered the cross-boundary impacts on infrastructure between HDC, CBC, MSDC and RBBC, as each authority has plans for future development within the Gatwick diamond area. Again a copy of this document is available on our website:

http://www.horshamdistrictldf.info/LDDS/local_dev_documents_4650.asp

The Council is actively working with the Gatwick Diamond authorities who have produced the Memorandum of Understanding and Local Strategy Statement. These authorities are working cross boundary on a number of issues including understanding the housing requirements in the area.

6. Are you planning to produce any additional evidence to assess housing and employment need/demand? If so, when is this likely to be available?

We have already produced a number of studies which will feed into the development of the HDPF & these are available on our website. See answer to question 3 for details.

7. Are there any other major site specific proposals/allocations envisaged in Horsham District that could have cross-boundary impacts for Waverley? If so, what work has been carried out to assess the cross boundary implications for infrastructure and services?

The council is currently holding a consultation on housing numbers in which four different options for growth are being considered. The responses to this consultation will be considered together with evidence taken from our background studies to feed into the preparation of a Preferred Strategy, scheduled for consultation in the autumn. The identification of potentially site specific allocations will not be known until this work has progressed. Comments were not received from Waverley in the September 2009 consultation which identified the potential strategic site options. Any cross boundary impacts will be considered in the evidence gathering before allocation of a site through the Horsham District Planning Framework to ensure viable and deliverable sites are allocated/ identified.

8. Are there any other strategic planning issues that you consider merit closer working/co-operation between Waverley and Horsham District?

Potential for Green Infrastructure projects and Air Quality management

9. Has your authority identified any particular governance procedures for dealing with the Duty to Co-operate?

As set out in question 5, the Council is actively working with the Gatwick Diamond authorities who have produced the Memorandum of Understanding and Local Strategy Statement. These authorities are working cross boundary on a number of issues including understanding the housing requirements in the area.