Dear Mr Drabble

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

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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 you are in the early stages of preparing the Local Development Framework for the South Downs National Park. You have indicated that the timescale for producing the Core Strategy is:-

- Issues and Options – June 2012
- Preferred Options – October/November 2012
- Publication – September 2013
- Submission – February 2014

**Questions**
Having regard to the above, I would welcome you 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 the South Downs National Park? If so, do you have any comments on changes/additions that need to be made to the Plan to deal with these?
2. Are you on track to meet the timetable set out above? If not, do you have a revised timetable for the Core Strategy?
3. Will you be producing a single Core Strategy or a series of documents produced in collaboration with the different local authorities?
4. Through your early work on the Core Strategy have you identified any cross boundary issues between Waverley and the South Downs National Park in terms of housing and employment, minerals and waste or infrastructure and services?
5. When are decisions likely to be made on key matters such as targets for housing and employment and minerals and waste?
6. What evidence do you currently have or are planning to produce, which will deal with potential cross-boundary impacts on infrastructure and services? If this evidence is still to be produced, when do you expect it to be available?
7. What evidence do you currently have or are planning to produce, which will consider the need/demand for homes and jobs within the South Downs National Park? Does this or will this consider any cross boundary issues such as migration patterns or travel to work patterns? If this evidence is still to be produced, when do you expect it to become available?
8. What evidence do you currently have or are planning to produce, which will deal with potential cross-boundary impacts in relation to minerals and waste? If this evidence is still to be produced, when do you expect it to be available?
9. Are there any major site specific proposals/allocations envisaged within the South Downs National Park that could have cross-boundary impacts for Waverley either because of their size or proximity to Waverley? If so, what work has been carried out to assess the cross boundary implications for infrastructure and services? As examples, you may be aware that this Council has taken a particular interest in proposals at the former King Edward VII Hospital in Midhurst and the Syngenta site at Fernhurst.
10. Are there any other strategic planning issues that you consider merit closer working/co-operation between Waverley and the National Park Authority?
11. 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
17 April 2011

Dear Graham,

I have reviewed the Core Strategy – Revised Preferred Options and Draft Policies document. Thank you very much for setting out specific questions for us, which I answer below. This is followed by some general observations about the Core Strategy.

1. I have no specific comments to make regarding cross-boundary impacts, although it is welcomed that the South Downs National Park is referred to in para. 2.28. The text also helpfully references the potential for impacts across Waverley’s boundary. The National Park is a key environmental designation should be shown on map 2.1. We would be happy to supply a GIS layer showing the position of the National Park boundary: it should then be clearer where Chichester District remains the Local Planning Authority (e.g. for Kirdford) and where South Downs National Park Authority has assumed planning responsibilities (including Fernhurst).

2. Please refer to our adopted Local Development Scheme: [http://www.southdowns.gov.uk/planning/planning-policy/local-development-framework](http://www.southdowns.gov.uk/planning/planning-policy/local-development-framework). Obviously it is something which we keep under review; the focus of our work in the coming months will be on developing the Issues and Options for the Core Strategy. We are currently considering the scope for incorporating the preparation of site allocations policies within the production timetable.

3. It remains our intention to produce a consolidated Core Strategy for the whole of the National Park, which would supersede all the policies the NPA inherited last year. In parallel to this, we have sought to make the most of the opportunities where districts have made substantial progress in developing Core Strategies, at the point of the National Park Authority’s formation, which include policy for the area of the district within the National Park boundary. Agreements have been signed with East Hampshire, Lewes, Mid Sussex, Wealden and Winchester districts for joint Core Strategies to be prepared. On adoption, these strategies would on adoption provide interim planning policy until the National Park’s own Core Strategy is adopted (in 2014).

4. Of course, we are aware that a number of our communities, enjoy a close relationship with settlements in Waverley. This is already identified in your Core Strategy e.g. the trend for commuting across a wide catchment to Haslemere railway station. We are especially alert of the need to ensure we work with our neighbours to address the effects that any major developments within the National Park will have on adjoining areas e.g. an increase in traffic flows or additional pressure on services and facilities. At the current time, there is no detail available on sites or broad locations of development that will be included as part of our Core Strategy/Local Plan, although you will be
aware of sites, such as Syngenta in Fernhurst, which have a long history of planning proposals.

We will be supporting Petersfield Town Council and Fernhurst Parish Council in producing Neighbourhood Plans which will look at the location for new housing in their areas and the appropriate mix of uses on sites with significant development potential. A number of communities have contacted us with expressions of interest to do neighbourhood planning. This has included Lynchmere and Easebourne parishes.

A Minerals and Waste Plan for Hampshire (including South Downs, New Forest, Portsmouth and Southampton) has been submitted for examination (this is expected to take place in June). Full details can be viewed at: http://consult.hants.gov.uk/portal. The SDNPA will start consultation on a new waste and minerals framework for West Sussex later this year.

5. The Core Strategy will be developed in greater detail over the coming months as we undertake extensive consultation on the draft issues and options. Key pieces of work which have been progressing this year include a settlement hierarchy study (to indicate the relative suitability of settlements within the National Park to accommodate development) and evidence to underpin the implementation of the Community Infrastructure Levy.

Within the South Downs National Park, housing provision will be restricted to that needed to serve its communities. The National Park Circular, which is specifically referred to in the NPPF, states that “The Government recognises that the National Parks are not suitable locations for unrestricted housing and does not therefore provide general housing targets for them. The expectation is that new housing will be focused on meeting affordable housing requirements, supporting local employment opportunities and key services”. (English National Parks and the Broads: UK Government Vision and Circular 2010).

6. We are not aware of any major strategic infrastructure that will be needed to address cross boundary impacts arising from development within the National Park.

7. We have prepared a Housing Requirement Study with DTZ for the National Park in 2011 (which is available on our website). Our Employment Land Review is well advanced and will be published soon (this work is being undertaken with Roger Tym). We are also preparing a Strategic Housing Land Availability Assessment for the National Park.

8. A soft sands study has been undertaken by SDNPA. It looks at a range of sites within the National Park, including on its boundary, which may offer potential to supply the National Park. This evaluation has
discounted the expansion of facilities at Kingsley, near Bordon and at Firthend due to their unsuitability/undeliverability. However, the Minerals and Waste Plan for Hampshire may be subject to further modification in light of the forthcoming examination-in-public.

9. Work on major site allocations has not yet been undertaken in the context of the emerging Core Strategy. Regarding the Fernhurst site you mention, you may be aware that Fernhurst Parish Council recently held a launch event for their Neighbourhood Development Plan (on 3rd April). They have set up a working group to examine the options for Syngenta; the group contains representation from Comer Homes (the owners of the site) and Savills (their agent). This is seeking to identify a viable, preferred solution for the site, which can be enshrined in the Neighbourhood Plan. You will be aware that the Neighbourhood Planning (General) Regulations 2012 require a qualifying body (e.g. the Parish Council) to consult any consultation body in para.1 of Schedule 1 whose interests may be affected by the proposals set out in a neighbourhood development plan (this includes a local planning authority any part of whose area adjoins the area of the local planning authority i.e. SDPA).

Whilst not a strategic planning matter, we would wish to work in close co-operation with yourselves where neighbourhood plans come forward in the vicinity of Waverley’s boundary or where relevant impacts arise elsewhere. As you will be aware, the National Park is in the rather unique situation of having a number of parishes which are split between the National Park and adjoining districts. In terms of the neighbourhood planning regulations, this will require a sound level of co-operation between authorities to ensure that neighbourhood planning bodies are appropriately supported and advised about which organisations they need to contact as their neighbourhood plans develop (e.g. National Park Authorities cannot hold referendums and are not able to hold or maintain a register of Assets of Community Value, nor do we hold a housing authority function).

9 We have not, at the current time, draw up governance procedures relating to the Duty to Cooperate. As you will be aware the presumption in favour of sustainable development only partly applies to the SDNPA. As a plan making body we should positively seek opportunities to meet the development needs of the area. The requirement to meet “objectively assessed needs” is subject to the more restrictive policy framework provided in paras. 115-16 of the NPPF: i.e. “great weight” should be given to our paramount purpose of conserving the landscape and scenic beauty, wildlife and cultural heritage of the National Park. It also identifies that major developments should be refused except in exceptional circumstances.

General observations
The National Park Authority previously commented on the Preferred Options and Draft Policies document, published in January 2011. We are pleased, in the intervening period, that there has been progress in addressing our principal concern relating to the Core’s Strategy’s ability to cater for Waverley district’s high housing need. The proposed figure of 220 dwellings per year between 2011 and 2028 from 152 dwellings per year (2010-2027) will clearly increase housing provision in Waverley quite significantly and release the pressure for development within the National Park. It is recognised that the latest spatial strategy goes further than merely identifying the scope for development within existing settlements/brownfield sites and now provides for the selected release of Greenfield land around the main settlements, informed by the more recently published findings of the SHLAA. It is evident that there is now a much closer correlation between housing provided for by the Core Strategy and the trend rate of housing completions in the Borough since 2006.

It remains, however, a little disappointing that the Core Strategy does not make more of the National Park’s significance on the doorstep of the Borough. There is only one mention of the South Downs National Park during the course of the 220 page document. It is characterised purely in terms of presenting a cross boundary issue, rather than in a more creative sense as providing a substantive opportunity to support the quality of life of communities within Waverley. Despite our previous comments, there remains no explicit reference to Haslemere’s role as an important gateway to the National Park from the north. This should be addressed by reference to the National Park in the Spatial Portrait of Haslemere. There remains an opportunity to address the limited service accommodation identified in para. 2.38; we would not concur that there are no major visitor attractions – the National Park is of significant importance for short to medium holidays based around leisure and recreation.

One possible shortcoming of the Core Strategy is that it doesn't incorporate an evaluation of key sites that may be required for the implementation of the strategy. This, in turn, would provide the critical information necessary to understand what infrastructure will need to be planned. The identification of such sites has been a feature of emerging national policy and is now incorporated within the adopted National Planning Policy Framework. Paragraph 47 says local planning authorities should identify "key sites which are critical to the delivery of the housing strategy over the plan period"; Para. 153 states that “any additional development plan documents should only be used where clearly justified.” It is not immediately clear to what degree there may be competition for land within the Borough for employment generating uses and other uses.

There is an opportunity to show the areas for selected Greenfield release on the key diagram (in accordance with para. 157 of the NPPF). According to Policy CS2, this only applies to Farnham, Cranleigh and Godalming. It is unclear how this policy’s assertion that land will only be used on the edge of Godalming where it is not Green Belt, AONB or AGLV is
achievable. A cursory glance at the Key Diagram seems to suggest such land is not available and that the Green Belt may therefore need to be reviewed.

We would also ask that where green infrastructure and biodiversity links are mentioned that this considers cross-boundary networks into the National Park. Chapter 15 makes no reference to the presence of a National Park on Waverley’s boundary, even though, it includes reference to a range of local designations. It should be clear that the positive outcomes of implementing Policy CS17 could be felt beyond administrative boundaries. Corridors for wildlife and recreation can potentially connect sites in Waverley (as mentioned in para. 15.27) to the National Park. As you will be aware, the conservation and enhancement of wildlife is identified as part of the National Park purposes and duty as set out in the Environment Act 1995. Para. 15.7 when referring to SSSIs should say geological, not “geographical”.

Climate change in the Core Strategy is introduced as being purely an altruistic concern. There is considerable evidence available to suggest on its own, this provides is an insufficient driver of behavioural change. Rather, research has shown that matters of self-interest, such as escalating energy bills or degradation of the natural environment caused by the over-abstraction of water, are likely to be more influential in shaping attitudes.

I hope this addresses your queries. Please do not hesitate to get in contact with me if you require any further information.

Kind Regards

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