

Annex 1:

Letter to Guildford Borough Council on its draft Local Plan Consultation 2014



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9 September 2014

Dear Sir/Madam,

Draft Guildford Borough Local Plan – Strategy and sites consultation

Thank-you for the opportunity to comment on the 2014 Draft Guildford borough Local Plan: strategy and sites and supporting documentation. Surrey Heath Borough Council wishes to make the following comments on the draft Plan and supporting documentation:

Supporting evidence base

There are important pieces of the evidence base for the draft plan which are not in place, or which have been prepared subsequent to the plan development. A key example of this is the lack of an up-to-date SHMA for the Housing Market Area (HMA) that Guildford falls within. This means that the policies in the draft plan have been developed independently of the evidence base. This is of concern for Surrey Heath as it is not possible to assess whether or not the policies are soundly based and likely to adversely affect Surrey Heath.

Identifying Full Objectively Assessed Housing Needs and housing targets

The housing policy evidence base consists of an out-dated SHMA, a more recent SHMA that is just focussed on Guildford and a housing topic paper. An up-to-date SHMA is not in place

for the Housing Market Area that Guildford has recently confirmed it falls into. The Housing Topic Paper identifies and justifies a housing target for the borough derived from the existing SHMA documents in the space of just a single sentence.

As a result of the lack of evidence and poor justification, Surrey Heath cannot assess whether Guildford have done all possible to meet its own full objectively assessed housing needs, either within its own boundaries, or via HMA partners. Surrey Heath is therefore unable to determine whether housing needs in Guildford will be pushed across the boundary into the other Blackwater authorities – including Surrey Heath.

Strategic growth location in the Blackwater Valley

Ash, Ash Vale and Tongham are part of the much wider Aldershot Built up Area which extends over a number of local authorities, including Surrey Heath. According to the ONS it is the 29th largest urban area in England and Wales. This area is often referred to as the Blackwater Valley urban area and its presence in the western area of Guildford Borough is significant component of the spatial pattern of development in the Borough. It would be useful for the Borough wide strategy (set out in Policy 2 of the draft Plan) to acknowledge this significant urban area and set out the future directions for it in the context of the Guildford spatial strategy.

The Guildford borough Key diagram indicates that the Blackwater Valley urban area lying within Guildford is identified for significant further development, along with the countryside immediate around.

Policy and information relating to those areas of the Blackwater Valley and immediate surroundings lying within Guildford is set out in a number of locations throughout the draft Local Plan and Surrey Heath found it difficult to identify and pull together as a coherent picture.

Policy 11 indicates land around Ash and Tongham will be designated as a strategic location for growth. Although this seems to be the main policy relating to development in the western side of the borough it has not been developed to:

- explain what the vision is for this side of the Borough, including its relationship with the rest of Guildford and the Blackwater Valley.
- Identify the type of development envisaged for the area;
- identify the strategic designation on a map;
- identify what quantum of development is expected to be developed in the area, and
- explain what specific development principles future development in the strategic growth area would be expected to follow.

This lack of detail and obscurity has made it difficult for Surrey Heath to assess the impacts of Guildford's policy proposals on its interests and the wider Blackwater Valley.

Duty to Co-operate

Surrey Heath considers the planning of development and infrastructure in the Blackwater Valley urban area to be an important strategic matter. Plan policies relating to this area should be the outcome of on-going, constructive and continuous engagement between the local authorities whose areas fall within the Blackwater Valley.

The draft Guildford Local Plan proposes a strategic growth location within the wider Blackwater Valley area but it has not acknowledged the potential cumulative cross border impacts or set the policy in the wider Blackwater Valley context. No attempts have been made by Guildford to undertake partnership working on this matter with Surrey Heath, or the other Blackwater Valley authorities as a group. This approach to the Blackwater Valley is not considered to be meeting the Duty to Co-operate responsibilities or delivering good place making.

Guildford and Surrey Heath have several cross boundary sites – Keogh Barracks, Bisley and Deepcut. The Plan makes no mention of this relationship or the future direction for these sites. It is important that the plan-making process of both Surrey Heath and Guildford recognise these sites and that engagement and dialogue in relation to them is constructive and on-going.

In light of the above concerns, Surrey Heath **object** to the draft Local Plan as currently drafted.

This Council would welcome the opportunity to engage with Guildford via the Duty to Co-operate processes with a view to resolving these concerns and thus facilitating sound and effective plan making for both Councils.

Yours sincerely

Surrey Heath Borough Council