

Response to Guildford Borough Council's Updated Draft Local Plan Consultation

Summary

Guildford Borough Council has published an updated Draft Local Plan document for consultation. The Consultation began on the 9th June and runs until the 24th July.

The document is the last stage in the production of the Guildford Local Plan and as such the consultation is the final opportunity to comment on the Plan before it is submitted to the Planning Inspectorate in Winter. It sets out the approach to be taken to development in Guildford Borough up to 2034. The consultation seeks comments on a number of changes to the Draft Local Plan, which was originally consulted on in Summer 2016.

Members are requested to consider the proposed consultation response set out in the letter at Annex 1 of this report as the Borough's formal representation on the Proposed Submission Local Plan Document.

Portfolio – Regulatory

Date Portfolio Holder signed off report: 19 June 2017

Wards Affected

All

Recommendation

The Executive is asked to RESOLVE that the letter contained in Annex 1 be authorised as Surrey Heath Borough Council's formal representation to the updated Draft Local Plan Consultation.

1. Resource Implications

- 1.1 There are no resource implications beyond that provided for within the agreed budget for 2017/18.

2. Key Issues

- 2.1 In June 2016, Guildford Borough Council published a Draft Local Plan, setting out the approach that Guildford Borough Council will take in delivering housing (and other development) in the Borough to 2033. This was subject to a six-week consultation period. Surrey Heath responded to the consultation and a copy of the response is provided at Annex 3.
- 2.2 The current consultation seeks comments on proposed changes to the Draft Local Plan. The changes seek to address comments made during the previous consultation, changes in circumstance and updates

in supporting evidence. The significant changes are summarised below:

- The Plan now covers the period up to 2034;
- Overall housing target reduced by 1,400 units;
- Objectively Assessed Housing Need revised down to 654 units from 693 units per annum;
- Alterations to the capacity of some housing sites, with others removed entirely;
- New sites for employment floor space and industrial land;
- New railway station to be allocated at Park Barn.

- 2.3 Surrey Heath is located within the Hart, Rushmoor and Surrey Heath Housing Market Area. This Housing Market Area adjoins the West Surrey Housing Market Area, comprising Guildford, Waverley and Woking. There is a requirement for each Housing Market Area to seek to meet its own identified Objectively Assessed Housing Need as set out within each area's Strategic Housing Market Assessment. In the first instance each individual Authority should seek to meet their own identified housing need within their own area; however, where this is demonstrably unachievable, efforts should be made to accommodate any unmet housing need elsewhere within their Housing Market Area. If this is not possible, efforts should be made to accommodate any unmet need within other authorities who do not form part of their Housing Market Area, but with whom the Housing Market Area shares links. For Surrey Heath, this would include Guildford.
- 2.4 Surrey Heath is severely constrained in terms of available land for housing development, primarily through the Thames Basin Heaths Special Protection Area (SPA) and the need to provide avoidance measures in respect of the impact of housing on the SPA. The Borough also has large areas of MOD operational land and Green Belt. It is therefore unlikely that Surrey Heath will be able to deliver the Objectively Assessed Housing Need identified for the Borough. It is necessary to raise this issue with our neighbouring Authorities as they prepare their Local Plans to ensure that opportunities can be explored to deliver any demonstrated unmet need arising from Surrey Heath within adjoining Boroughs. This matter has already been raised with Guildford, within a letter issued under the Duty to Cooperate (see Annex 2).
- 2.5 As a result, it is possible that Surrey Heath will need to look to its Housing Market Area to accommodate any demonstrated unmet need and in the event that the Housing Market Area is unable to meet this need, the Council may need to approach other Authorities outside of the Housing Market Area, including Guildford.
- 2.6 In view of the above and given that Guildford has previously proposed a sustainable development strategy capable of delivering 1,400 additional houses over and above that set out within the current iteration of its updated Draft Local Plan, Surrey Heath would welcome

further engagement with Guildford to better understand why the updated Draft Local Plan is unable to allow for any flexibility to accommodate any demonstrated unmet need arising in any neighbouring Boroughs. Surrey Heath would also request that the Guildford Duty to Cooperate Topic Paper is updated to include Surrey Heath as a duty to cooperate body with which engagement on housing matters should be undertaken. This reflects the linkages between the Housing Market Areas covering Guildford and Surrey Heath and reflects the content of the Surrey Heath Duty to Cooperate Scoping Statement.

- 2.7 In response to the June 2016 consultation, Surrey Heath raised an objection to the proposed removal of Keogh and Pirbright Barracks from the Green Belt (see Annex 1). The Council's concerns were subsequently addressed by Guildford Borough Council, who have confirmed that the inseting the sites from the Green Belt is unlikely to result in any significant changes to the overall use or impacts of the sites as a result of their rural location and proximity to the Thames Basin Heaths Special Protection Area.

3. Options

- 3.1 The options are:

- (i) Agree the response set out in the letter appended to this report (Annex 1) and to submit them as the Council's formal response to the Guildford updated Draft Local Plan Consultation.
- (ii.) To agree the response set out in the letter appended to this report (Annex 1) with any additional comments from Executive and to submit them as the Council's formal response to the Guildford updated Draft Local Plan Consultation.
- (iii.) To not agree the response.

4. Proposals

- 4.1 That the report, letter and consultation response form are noted.

5. Supporting Information

- 5.1 The Guildford updated Draft Local Plan June 2017.

6. Corporate Objectives And Key Priorities

- 6.1 Responding to the updated Draft Local Plan consultation will enable Surrey Heath to maintain an active engagement with an adjoining Borough where there are matters of strategic importance between the Boroughs.

7. Policy Framework

- 7.1 Making a representation on the updated Draft Local Plan will enable Surrey Heath to formally draw Guildford's attention to comments it has in relation to the Guildford updated Draft Local Plan.

Annexes	<p>Annex 1: Letter setting out Council's response to the Guildford Draft Local Plan 2017 consultation;</p> <p>Annex 2: Duty to Cooperate letter to Guildford January 2017.</p> <p>Annex 3: Letter setting out Council's response to the Guildford Draft Local Plan 2016 consultation;</p>
Background Papers	Guildford updated Draft Local Plan June 2017.
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Head of Service	Jenny Rickard – Executive Head of Regulatory

Consultations, Implications and Issues Addressed

Resources	Required	Consulted
Revenue	✓	<u>14/06/17</u>
Capital		
Human Resources		
Asset Management		
IT		
Other Issues	Required	Consulted
Corporate Objectives & Key Priorities	✓	<u>14/06/17</u>
Policy Framework		
Legal	✓	<u>14/06/17</u>
Governance		
Sustainability		
Risk Management		
Equalities Impact Assessment		
Community Safety		
Human Rights		
Consultation	✓	<u>14/06/17</u>
P R & Marketing	✓	<u>14/06/17</u>

Review Date:

Version: 1