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Planning Policy (Local Plan)
 Planning Services
 Guildford Borough Council
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13th June 2017

By email only

Dear Sir/Madam,

Guildford Proposed Submission Local Plan Regulation 19 Consultation (updated)

Thank you for consulting Surrey Heath Borough Council on the Guildford Proposed Submission Local Plan (updated).

This letter provides the Council's formal response to the consultation.

As you will be aware through our Duty to Co-operate letter dated the 19th January 2017, 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.

Surrey Heath is now in the early stages of developing a new Local Plan and continues to develop a broad range of appropriate evidence to enable it to make robust decisions in respect of the extent that the Plan is able to meet the OAHN for Surrey Heath. However, the Council's most recent Strategic Land Availability Assessment (July 2016) indicates that there will be a shortfall of land within the Borough to deliver the Council's OAHN and, whilst the Council will consider spatial strategies that could reduce this shortfall in the course of preparing the new Local Plan, it is unlikely that Surrey Heath will be in a position to meet the full OAHN for the Borough.

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As a result, it is possible that Surrey Heath will need to look to its Housing Market Area to accommodate any demonstrated unmet need. In the event that the Housing Market Area is unable to meet this need, the Council may need to approach other authorities who do not form part of the Hart, Rushmoor and Surrey Heath housing market area, but with whom the Housing Market Area shares links. This would include Guildford.

In view of the above and in light of the fact 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 Proposed Submission Local Plan, Surrey Heath would welcome further engagement with Guildford under the Duty to Cooperate to better understand why Guildford, under the terms of the updated 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.

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. The Council recognise that the Council's concerns have subsequently been addressed by Guildford Borough Council, who have confirmed that the insetting 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.

Surrey Heath Borough Council looks forward to continuing to working with Guildford in respect of housing and other Local Plan matters as each of the Authorities Local Plan progresses.

Yours faithfully,

Kate Galloway
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