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Dear Sir/Madam,

Guildford Local Plan: Main Modifications Consultation

I am writing on behalf of Waverley Borough Council in response to the proposed Main Modifications to the Guildford Local Plan: Strategy and Sites.

The Council's comments are set out below:

Policy S2 – MM2

The Council's comments relate to the issue of unmet housing need from Woking. During the Examination Hearings the Inspector issued his note ID/6, which included a section on unmet housing need. In that section the Inspector stated that Guildford should be seeking to accommodate a meaningful amount of around 25%, which he calculated as 787 dwellings. The Inspector noted that in Waverley, which was being asked to pick up 50% of the unmet need, the allowance was being spread over the whole Plan period. He said that if the same approach was taken in Guildford, this would amount to 41 dwellings per annum (dpa).

It is noted that in the proposed modifications, an allowance has been included for 42 dpa as a contribution towards the Woking unmet need. However, this is only applied to the period from 2019, rather than from the start of the Plan period (2015). As a result, the contribution only amounts to 615 dwellings, rather than the 787 identified in the Inspector's note. The contribution towards the unmet need is, therefore, around 20% not the 25% identified by the Inspector.

The Council appreciates that the Inspector will have given this matter careful consideration. However, in the modifications that Guildford Borough Council is consulting on, there does not appear to be a justification as to why the contribution towards the Woking unmet need does not apply from the start of the Plan period. This was the approach taken with the Waverley modifications. If there is a justification for not including this within the period 2015 to 2019, then it is still possible for Guildford to contribute towards meeting 25% of the unmet need, by increasing the contribution for the period 2019 to 3034 from 41 to 53 dpa, which would ensure delivery of the 787 identified by the Inspector in his note. From the information available there appears to be no reason why this increase in the contribution to Woking's unmet needs cannot be accommodated, given that the Plan anticipates a total supply of 15,107 against a proposed target of 12,600.

Policy A61 – MM39

This relates to land at Aaron's Hill on the edge of Godalming. This is one of a number of sites that Guildford Borough Council is proposing to allocate in order to deliver more housing in the first five years of the Plan than originally proposed. The first observation is that it will be necessary for Guildford Borough Council to be satisfied that this site is capable of delivering housing in that timescale. If the site is to be brought forward, then it is essential that there is proper integration of the proposals for this site with the adjoining site within Waverley Borough and the Council welcomes the commitment to comprehensive masterplanning in requirement 1. However, it wishes to see an emphasis on infrastructure added into this requirement within the policy. Many of the impacts will be felt by residents of Waverley and so it is imperative that infrastructure contributions are sought to address impacts on either side of the Borough boundary. It will be essential to ensure that any potential cross-boundary impacts are properly addressed and mitigated if this development is to go ahead.

Policy A62 –MM43

This relates to land at Hornhatch Farm in Chilworth, another site brought into the Plan to boost housing supply in the early years. The Council notes that this site adjoins the boundary with Waverley. Therefore, if this site is to come forward, it is essential that any cross boundary impacts, such as from additional traffic, are addressed within the policy. Careful consideration will also need to be given to the landscaping, given that the adjoining land in Waverley to the south is within the Green Belt and the AGLV.

Yours faithfully,

Elizabeth Sims
Head of Planning Services