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23 October 2018

Dear Mr Bore,

### **Representation to Guildford Local Plan Main Modifications**

I am writing this letter in conjunction with the Executive at Guildford Borough Council, and with their full support, as Leader of the Council and Lead Member responsible for the Guildford Local Plan.

The Executive wish to adopt a realistic and achievable Local Plan at the earliest opportunity. It has been a long journey, which has been difficult and divisive for some of our community however a new Local Plan is long overdue. Nonetheless, given the current context in relation to the revised OAN, we will not be recommending adoption of the new plan with proposed main modifications. Many difficult decisions have already been taken and we strongly believe that the scale of growth in the local plan as submitted was a bold attempt to fully meet OAN, and our local needs as a community, in very challenging circumstances.

For the Guildford Local Plan to be adopted by this Council it has to achieve an appropriate balance between meeting the needs of the borough in terms of housing, employment and retail in a sustainable way whilst protecting the character of the borough. We are pleased that the plan as originally submitted by ourselves, after much public consultation, has been found fundamentally sound at the end of the Local Plan hearing sessions.

However, the Guildford Borough Council Executive have serious concerns in relation to the inclusion of the additional, highly sensitive Green Belt sites and the resulting rate of housing delivery over the first five years of the plan that is necessary to achieve a robust rolling five year land supply. It is widely recognised within Government that as a Local Planning Authority we currently have no means of forcing developers to build at the rates presented during the public hearing sessions.

We therefore welcome the updated household projections, which demonstrate that our OAN is reduced from that assessed during the hearing sessions. Lowering the housing requirement in the plan would enable us to meet our housing needs in the early years without a phased approach. It would also ensure that the adopted plan is robust and deliverable, and will not be rendered out of date soon after adoption should delivery not



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**Guildford Borough Council**

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meet the significant rates required by the plan with main modifications. We require a sustainable plan that achieves good design and delivers sufficient housing, employment, retail and most importantly new infrastructure to be built out for the benefit of the existing community as well as new members of the community. Whilst Guildford Borough Council intends to deliver a significant level of supporting infrastructure ourselves, we require a Local Plan that sets out the requirements for developers and our partners in order to deliver this sustainable growth.

We therefore ask you to consider and act on the following:

1. We ask that you review and amend the plan in light of the new household formation figures by amending the housing requirement to reflect the latest evidence.
2. The Executive have never accepted that there is a real 'unmet need' in Woking as a comprehensive borough wide Green Belt and Countryside study has not been undertaken by Woking BC. Furthermore, following the approval by Woking BC of their Core Strategy Review at their Full Council on 18 October, there is now confirmation by Woking BC that there is no unmet need arising from Woking. We therefore ask that all additional numbers applied to the Guildford Local Plan to meet this perceived need be removed from the plan to enable the Executive to recommend adoption.
3. As a result of the reduced OAN and bearing in mind that we have no realistic means of forcing early delivery on allocated sites, we ask that you remove all new green belt sites proposed during the hearing sessions as these are no longer necessary to meeting housing need in the early years. Instead, we ask that you accept the sites and rates of delivery proposed by the Council in the Submission Local Plan to ensure that the plan continues to be sound after it is adopted.

Whilst we require a new Local Plan as soon as possible, we accept that given the latest 2016-based household projections published very recently by ONS and the significant impact upon Guildford's OAN, there may be a requirement for a further delay and the possibility of another hearing, and we accept that position. We also accept that there is a genuine housing crisis in our Borough and a serious deficit in Infrastructure.

It is important for all who live in, work in or travel through Guildford's borough that a sound, sustainable and fair Local Plan is adopted.

Yours Sincerely



**Cllr Paul Spooner**  
**Leader of the Council**

**Executive Members:**

Councillor Matt Furniss  
Councillor David Bilbe  
Councillor Philip Brooker  
Councillor Geoff Davis  
Councillor Graham Ellwood  
Councillor Gordon Jackson  
Councillor Nigel Manning  
Councillor Nikki Nelson-Smith  
Councillor Iseult Roche  
Councillor Jo Randall  
Councillor David Wright