



GUILDFORD
BOROUGH

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Ms Mary O'Rourke BA(Hons) DipTP MRTPI
Intelligent Plans and Examinations (IPE) Ltd

Via email (copied to Send Parish Council)

25 August 2020

Dear Ms O'Rourke,

SEND NEIGHBOURHOOD PLAN EXAMINATION

Thank you for your preliminary questions for Guildford Borough Council and Send Parish Council in your email dated 27 July 2020 (ref. 01/MOR/SNP) in respect of your examination of the Send Neighbourhood Plan.

I have attached responses on behalf of the Borough Council to the first six of these questions, which were directed to us to answer. I am sending these ahead of the rearranged date for submission of responses, which we agreed with Intelligent Plans and Examinations (IPE) via email to be extended to 30 August 2020.

I have arranged for our responses to be published on Guildford Borough Council's website as you requested at <https://www.guildford.gov.uk/article/16998/Send>. I will also arrange to publish those of Send Parish Council on the same web page as soon as they have copied me into them.

I am glad that you are happy at this stage for the Send Neighbourhood Plan examination to proceed and look forward to seeing and commenting on your fact check report in due course.

If you have any further questions that I can assist with then please do not hesitate to contact me.

Yours sincerely

Gavin Stonham MRTPI
Senior Policy Planner



INDEPENDENT EXAMINATION OF SEND NEIGHBOURHOOD PLAN
GUILDFORD BOROUGH COUNCIL'S RESPONSES TO THE EXAMINER'S
PRELIMINARY QUESTIONS

- 1. The Foreword to the Plan refers to the Guildford Community Infrastructure Levy and its anticipated adoption in May 2020. Has it been adopted and, if so, when?**

Response:

The Community Infrastructure Levy (CIL) has not yet been adopted in Guildford borough. A CIL Draft Charging Schedule is at present scheduled to be published for consultation by the Council in the first half of 2021, following preparation of an update of viability evidence underpinning proposals around charging rates. Submission for examination and subsequent adoption is then scheduled to follow in the second half of 2021.

The Council is publishing updates to the timetable for preparation of the CIL on its website at <https://www.guildford.gov.uk/localplan/cil>.

- 2. The Plan and representors have referred to the West Surrey Strategic Housing Market Assessment of 2015 and Addendum Report 2017. Please confirm that they are the most up to date documents relevant to the Plan area and provide electronic links to the documents.**

Response:

These are the most up to date Strategic Housing Market Area (SHMA) documents relevant to the Local Plan and neighbourhood plan areas. Both documents (the West Surrey SHMA and West Surrey SHMA Guildford Addendum Report 2017) can be downloaded from the following web page: <https://www.guildford.gov.uk/localplan/housing>.

- 3. In respect of the consultation representations, I have now received a copy of the representations made by Gladman SNP 20/13. Please confirm that comment ref. SNP 20/1 and 20/2 were in fact made by Nigel Sturgess and not Astenbell Ltd, as listed; that comment ref. SNP 20/11 was made by Astenbell Ltd on behalf of Langham Homes; and please provide the names of those who made comment ref. SNP 20/3 and SNP 20/9, which are unattributed on my list.**

Response:

The comments ref. SNP 20/1 and 20/2 were submitted by Nigel Sturgess, who is Director of Astenbell Ltd. The representations table on the Council's website was correct as the respondent's name appeared as the name of the company. However, as the company name (Astenbell) did not appear on his attached email, we have made this clearer by removing this attachment.

Comment ref. SNP20/11 was made by Woolf Bond on behalf of Langham Homes.

Comments ref. SNP 20/3 and SNP 20/9 were left unattributed in the summary of representations table as they were made by individuals rather than companies and our consultation software removes names of individuals automatically. However, we are able to publish their names without any other personal details as we indicated on our website at the start of the consultation that we may do this. The representors' names were therefore as follows:

SNP20/3 – Guida Esteves; and
SNP20/3 – Andrew Bamber.

4. In comment ref. SNP 20/11 a quote is provided from the Borough Council's planning policy manager. Please confirm that it is an accurate record of their address to the Planning Committee in October 2019.

Response:

It should be noted that the commentary the representation refers to was said by the Principal Policy Planner rather than the Planning Policy Manager. The webcast for the quoted planning committee meeting is no longer available given the length of time since the meeting was held so we cannot confirm that this is an accurate transcript of what was said, however there are aspects within it that appear familiar. In particular, part of it is a quote from the [West Surrey SHMA \(2015\)](#) at paragraph 8.44:

'Although we have quantified this on the basis of the market modelling and our understanding of the current housing market we do not strongly believe that such prescriptive figures should be included in the plan making process and that the 'market' is to some degree a better judge of what is the most appropriate profile of homes to deliver at any point in time.'

In addition to this, the minutes from the Planning Committee meeting include the following:

The Committee was advised by the Principal Policy Planner that the SHMAA housing mix percentages were calculated across Waverley, Woking and Guildford and were just a guide to be used over a nineteen-year period. Policy H1 stated that new residential development was required to deliver a wide range of homes to meet a range of accommodation needs as set out in the SHMAA. It referred to new residential development but did not refer to individual site proposals. New development should provide a mix of housing tenures, types and sizes appropriate to the site size, characteristics and location. The policy was not prescriptive but sought a mix of tenure types and sizes of dwellings.

[\(Meeting of Planning Committee, Wednesday, 9th October, 2019 7.00 pm \(Item PL79\)\)](#)

5. Please advise me of the Borough Council's view on policy Send 2 e), where the mixture of dwelling sizes is expressed as minimum percentages, in terms of its general conformity with the strategic policies of the Local Plan.

Response:

The housing mix percentages within the emerging Send Neighbourhood Plan (SNP) differ from the [West Surrey SHMA](#) mix in terms of the percentage split between one to three bed and four bed dwellings, and the imposition of maxima/minima. The evidence used to justify an increased requirement for smaller properties appears to be the Census 2011 which indicates that Send's stock of smaller properties is lower than the borough average. This differs from a number of other neighbourhood plans across Guildford borough which have used evidence provided by a local housing need survey to justify a local variation to the SHMA percentage mix.

Policy H1(1) of the Local Plan: strategy and sites (2019) includes an important proviso that '*new development should provide a mix of housing tenures, types and sizes appropriate to the site size, characteristics and location*'. The Council is of the view that any housing mix policy in a neighbourhood plan would need to be considered alongside this requirement. However, it is acknowledged that, as it currently stands, this may not be apparent to the decision maker. In order to ensure greater clarity, it may therefore be prudent for any specific housing mix policy included in the SNP to acknowledge that site-specific considerations have an important role to play and could justify a more flexible approach in some circumstances.

In addition to this, it should be borne in mind that Send Parish contains a number of Local Plan site allocations. These sites are allocated on the strategic basis of meeting borough-wide needs and as a

result it would be more appropriate for these sites to be consistent with the borough-wide SHMA mix rather than the locally identified mix set out in SNP Policy Send 2 e).

Finally, Policy Send 2 states: *'The following mixture of dwelling sizes are provided unless subsequent updates to the Strategic Housing Market Assessment indicate a different need for Send Parish'*. The existing SHMA and any updates to it would not identify a specific need for Send Parish – instead it would assess the need across the borough and the housing market area. As currently written the policy would never be capable of adapting to new evidence.

6. Could the Borough Council please confirm that there are no issues with the Plan's compatibility with human rights legislation?

Response:

We can confirm that there are no issues that the Borough Council is aware of with any aspect of the Plan and compatibility with human rights legislation.