

## **GBC response to Pre-Submission Surrey Heath Local Plan (2019-2038): (Regulation 19)**

Thank you for consulting Guildford Borough Council on the Regulation 19 Pre-Submission Surrey Heath Local Plan (2019 - 2038). We have set out our comments to this consultation below and ordered it by policy/topic.

### **Policy SS1: Spatial Strategy**

GBC supports the positive approach taken by Surrey Heath in meeting its Local Housing Need in full with an additional buffer in supply to provide flexibility should sites not deliver as planned. Experience from the Guildford Local Plan: Strategy and Sites 2019 is that sites are often delayed and if one does not have a sufficient buffer then there is a significant risk that the authority will be unable to demonstrate a rolling five year supply.

GBC also notes that the Local Housing Need as currently calculated using the Standard Method is significantly fewer than is currently being proposed as part of the Government's consultation on a revised NPPF. GBC understands that Surrey Heath is intending to submit the plan in mid-November which, under the draft proposals, would enable the examination to occur under the existing NPPF.

### **Policy H11: Gypsies and Travellers and Travelling Showpeople**

GBC recognise the extensive efforts you have made which seek to meet your need for traveller accommodation, albeit that these efforts appear to have yielded limited positive results to date and thus a somewhat concerning potential shortfall of sites.