

## **Guildford Borough Council's Responses to the Inspector's Matters and Issues for Examination**

# **Contents**

Question 1	3
Question 2	9
Appendix 2.1	21
Appendix 2.2	33
Question 3	44
Question 4	45
Appendix 4.1	58
Appendix 4.2	59
Appendix 4.3	60
Appendix 4.4	61
Appendix 4.5	62
Question 5	63
Appendix 5.1	66
Appendix 5.2	67
Appendix 5.3	68
Appendix 5.4	69
Question 6	70
Question 7	95
Appendix 7.1	98
Question 8	102
Appendix 8.1	112
Question 9	115
Question 10	127
Question 11	128

## Question 1 – Plan Preparation

### 1.1 Is the Sustainability Appraisal adequate?

#### Overview of the SA process

- 1.1.1 A process of Sustainability Appraisal (SA) has been undertaken alongside plan-making, in accordance with procedural requirements prescribed by the Strategic Environmental Assessment (SEA) Directive (2001) and the transposing regulations, the Environmental Assessment of Plans and Programmes (SEA) Regulations (2004) ('the Regulations').
- 1.1.2 Key procedural steps were as follows -
- 1) **Reasonable alternatives** were established and appraised in 2016, in order to inform preparation of the Proposed Submission Plan.
  - 2) The **SA Report** was published for consultation alongside the Proposed Submission Plan in 2016, presenting an appraisal of "the plan and reasonable alternatives", in accordance with Regulation 12(2), as well as other information required under the Regulations.
  - 3) **Reasonable alternatives** were revisited in 2017, to inform the preparation of the 'Targeted Changes' consultation document being prepared at that time.
  - 4) An **SA Report Update** was published for consultation alongside the Targeted Changes in 2017, presenting an updated appraisal of "the plan and reasonable alternatives" (as well as giving stand-alone consideration to the Targeted Changes).
- 1.1.3 N.B. The SA Report Update (2017) supersedes the SA Report (2016). The role of the SA Report Update is explained at para 2.1.2 of the report.
- 1.1.4 Also, as is typically the case, the SA process has involved a number of additional steps, over-and-above steps 1 to 4, as explained within Part 1 of the SA Report Update (2017), which answers the question: "*What has plan-making / SA involved up to this point?*"
- 1.1.5 Having provided an overview of the SA process, there is now a need to examine steps 3 and 4 in further detail.

#### The reasonable alternatives 2017

- 1.1.6 The process of establishing the reasonable alternatives is explained within **Chapter 6** of the SA Report Update (2017), which deals with "Establishing the reasonable alternatives". The aim is to present "an outline of the reasons for selecting the alternatives dealt with", in accordance with Schedule 2(8) of the Regulations.
- 1.1.7 **Figure 6.1** presents an overview of the process, explaining that the reasonable alternatives were established in light of: A) 'context' provided by past appraisal work and consultation; and B) bespoke work to examine issues/options completed in early 2017. It is worthwhile recapping here on (B).

- 1.1.8 As explained by Figure 6.1, work in early 2017, to inform establishment of the reasonable alternatives, involved consideration of: A) growth quantum options; and B) distribution options.
- 1.1.9 Consideration of growth quantum options is explained within **Section 6.5**. The conclusion reached is that, in addition to the default option of providing for objectively assessed housing needs (OAHN), the option of providing for a quantum of housing *above OAHN* cannot be ruled-out, and hence should be considered in detail through consideration of reasonable alternatives. With regards to the option of providing for a quantum of housing *below OAHN*, the conclusion reached is that this can be ruled out, for the reasons provided at para 6.5.4 (N.B. there is a need to read para 6.5.4 in light of the preceding discussion of ‘context’, as presented across sections 6.2, 6.3 and 6.4).
- 1.1.10 Consideration of distribution options is explained within **Section 6.6**. Specifically, Section 6.6 examines each tier of the Guildford Borough spatial hierarchy in turn, reaching conclusions (see bold text) on whether each tier should be a ‘given’ or a ‘variable’, for the purposes of establishing reasonable alternatives. Where the approach to growth is identified as requiring further detailed examination through the appraisal of reasonable alternatives - i.e. it needs to be a ‘variable’ - then options are also presented. Further points to note are -
- a) It is naturally the case that higher tiers (e.g. urban brownfield) are more suited to being treated as a ‘given’, and, conversely, lower tiers (e.g. Green Belt) more suited to being treated as a ‘variable’. In general, growth should be maximised at locations falling within the higher tiers, with the precise quantum largely a factor of technical delivery considerations.
  - b) For two of the ‘variable’ tiers - Green Belt around the Guildford Urban Area; and Green Belt around villages – the identification of options was more complex, necessitating supplementary discussion within Boxes 6.9 and 6.10. Within the boxes, consideration is given to the merits of all site options potentially in contention for allocation, drawing upon: evidence provided by the Countryside and Green Belt Study (first and foremost); the ‘Site Options SA’ presented within Appendix IV; and a degree of professional judgement, arrived at in light of discussions between Officers and AECOM. Also, it goes without saying that contextual understanding, as summarised in Sections 6.2, 6.3 and 6.4, was a factor.
- 1.1.11 Having gone through the process of considering the context (Sections 6.2, 6.3 and 6.4) and steps taken in early 2017 (Sections 6.5 and 6.6), **Section 6.7** draws matters together to arrive at a single set of reasonable alternatives, i.e. alternative approaches to the allocation of land for housing, or ‘spatial strategy alternatives’ [N.B. the decision to focus on ‘spatial strategy alternatives’ is explained in Chapter 5]. Section 6.7 concludes by presenting the reasonable alternatives in tabular and graphic form, and also by presenting a brief (‘at a glance’) discussion of unreasonable options.

1.1.12 As a final point, it is important to emphasise that Section 6.7 should be read in conjunction with the preceding sections, rather than being read on a stand-alone basis. It is Chapter 6 as a whole that seeks to present the required “outline of the reasons for selecting the alternatives dealt with”.

### The SA Report Update 2017

1.1.13 The SA Report Update presents all of the information required of the SA Report, as demonstrated in Appendix I of the report, which presents a “Regulatory Checklist”. With a view to supplementing Appendix I, Table 1.1 provides an overview of the information presented within the SA Report Update.

**Table 1.1: Information presented within the SA Report Update**

'Part' of the report	Information provided
Introduction	Explains the role of the report; presents plan objectives and the SA framework.
<b>Part 1 - What has plan-making / SA involved up to this point?</b>	Explains the process of arriving at reasonable alternatives.
	Presents a summary appraisal of the reasonable alternatives.
	Presents the Council’s response / reasons for supporting the preferred option.
<b>Part 2 - What are appraisal findings at this stage?</b>	Presents an appraisal of the Proposed Submission Plan [Also gives stand-alone consideration to the effects of Targeted Changes, and also ‘cumulative effects’; also presents recommendations and discusses the response to earlier recommendations]
<b>Part 3 - What are next steps?</b>	Explains subsequent plan-making steps, and discusses monitoring.
Appendices	Most importantly, presents supplementary information on issues/options considered as part of the process of arriving at reasonable alternatives.
N.B. the non-technical summary (NTS) is a separate document.	

### Conclusion

- 1.1.14 In conclusion, the SA process has effectively influenced plan-making both -
- directly - through systematic evidence-based analysis completed at numerous junctures; and
  - indirectly - via publication of accessible reports that have supported informed consultation.
- 1.1.15 The SA process has been undertaken in accordance with the central objective of the SEA Directive, as explained by Article I (“Objectives”), which is to: *“provide for a high*

*level of protection of the environment and to contribute to the integration of environmental considerations...”.*

1.1.16 Furthermore, as envisaged by the preamble to the SEA Directive, the SA process has resulted in: “a more consistent framework in which to operate by the inclusion of the relevant information into decision making [and hence] the inclusion of a wider set of factors... [and hence] more sustainable and effective solutions...”

**1.2 *Has an appropriate Habitats Regulations Assessment been undertaken and is the plan’s approach towards the Thames Basin Heaths Special Protection Area sound?***

1.2.1 A robust HRA has been undertaken for the submitted Local Plan which considers all identified effects of the plan on internationally important wildlife sites (not just alone but also in combination with other plans and projects). The HRA concludes there will be no adverse effects on the integrity of any internationally important wildlife sites. The HRA was consulted upon with Natural England and in its [letter of 12 July 2017](#) it confirms it agrees with that conclusion. The Council’s approach to the Thames Basin Heaths is sound because it follows the agreed strategy for treating net new development around the heaths as set out in the Thames Basin Heaths Special Protection Area Avoidance Strategy 2017 SPD and agreed with Natural England. It also meets the requirements of policy NRM6 of the South East Plan, the current regional policy for the SPA.

1.2.2 The Council is aware that recent rulings from the European Court regarding Case C-323/17 have clarified the process for HRA and made it clear that mitigation and avoidance measures must be considered at the Appropriate Assessment stage, and not during the screening stage. The HRA is compliant with this judgement because it is within the Appropriate Assessment section (and not the screening section) that it concludes that there will be no adverse effects on the integrity of the SPA because of the mitigation and avoidance measures. However, the Council will make some minor wording changes in order to ensure the process as clarified by the EU courts has been followed. The Council does not consider that this will affect the content of the HRA and the analysis and conclusions will remain the same. The amended HRA will be produced in the coming weeks and will be added to the evidence base.

**1.3 *Can the Council demonstrate that it has exercised the Public Sector Equality Duty adequately in the preparation of the plan and the formulation of its policies***

1.3.1 The Council has had due regard to the public Sector Equality Duty (PSED)<sup>1</sup> in the preparation of the Local Plan and the formulation of its policies and will continue to do so as the plan progresses toward and through the adoption process.

1.3.2 The Council has been mindful of the aims of the PSED<sup>2</sup> and has given particular thought to how the Local Plan policies (and subsequent modifications) may be

---

<sup>1</sup> As per section 149 of the Equality Act 2010.

formulated in a manner that advances these aims and does not discriminate, including indirectly, on any sector of society. The Council has been alert to how Policies may or may not impact on particular groups and has had due regard to the interests and needs of those sharing the protected characteristics under the Equality Act.

#### Submitted Equality Impact Assessment

- 1.3.3 Council's exercise of the PSED as part of the Local Plan process is ongoing, however, it considers that the Equality Impact Assessment (EqIA) screening tool is a useful means of reflecting on this at (a) particular points in the Local Plan process.
- 1.3.4 To this end, an EqIA screening was conducted in July 2014 in line with consultation on the Draft Local Plan at the time. This document was submitted to the Inspector in December 2017 (document reference GBC-LPSS-CD-008).
- 1.3.5 In essence, this EqIA did not identify concerns with regard to differential impacts of the Local Plan on those sharing protected characteristics. It did point to the manner in which Local Plan policies might further support the aims of the PSED in relation to groups with differential needs. This included, for example, having regard to possible differential impacts due to religion or belief, racial groups and age in the Local Plan policies.

#### Policy formulation and the Council's exercise of the PSED.

- 1.3.6 The Council considers that it has and continues to pursue suitable Local Plan policy options in the context of the PSED and in particular in relation to protected characteristics. A number of policy examples (although not an exhaustive list) evidencing this are referred to below.
- 1.3.7 The Council has actively sought to ensure equality in the provision of new homes across different racial groups in the borough. In particular, the Council have been mindful of pursuing policies that do not result in indirect discrimination to the Gypsy and Traveller community. Apart from ensuring that the housing needs of this group are met<sup>3</sup>, it has specifically sought to ensure that potential exclusion is avoided in relation to how it has dealt with its rural exception policy (see the Council's response to the Inspector's Matters and Issues item 6.9, which makes reference to the Council's duties under the Equality Act).
- 1.3.8 Furthermore, the Council has sought to ensure that, where relevant, Policies address the needs of different religious groups. In this regard, the Local Plan makes a site allocation for a burial ground (site allocation A23). A key motivation for this is to

---

<sup>2</sup> Including i) eliminating unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Act; ii) advancing equality of opportunity between people who share a protected characteristic and people who do not share it; and iii) fostering good relations between people who share a protected characteristic and people who do not share it.

<sup>3</sup> See the Council's response to the Inspector's MIQ 6.6 relating to its approach of addressing all travellers' accommodation needs (for those households that meet the PPTS planning definition, those that do not and those of unknown planning status).

provide choice for burials and cremations “so that families can select the service based on their religious, location and other needs.” (see paragraphs 8.5 - 8.8 of the Guildford borough Infrastructure Delivery Plan, 2017, reference no: GBC-LPSS-SD-029).

- 1.3.9 Outside of these specific examples, the Council's approach to the Local Plan and related policy formulation has also occurred in line with various aspects of the NPPF, which give direction to planning that is consistent with the aims of the PSED. This includes in relation to:
- delivering a wide choice of high quality homes, widening opportunities for home ownership and creating sustainable, inclusive and mixed communities (in line with Paragraph 50 of the NPPF) – see especially Policy H1 of the Local Plan;
  - involving all sections of the community in the development of the Local Plan (in line with Paragraph 69 of the NPPF) – see section 2 of the Council's Community Involvement in Planning (2013), reference no: GBC-LPSS-CD-018;
  - proactively engaging a wide section of the community (in line with Paragraph 155 of the NPPF) – see section 2 of the Council's Community Involvement in Planning (2013), reference no: GBC-LPSS-CD-018.

#### Further actions in line with the PSED

- 1.3.10 The Council has considered the EqIA screening submitted to the Inspector and is of the view that it should be updated to reflect on the progression of the Local Plan and its policies. This is likely to be appropriate prior to any further consultation on the Local Plan, should this occur, and/or prior to adoption of the Local Plan. As part of this update, the Council will also be in a position to correct what it regards as an error in the submitted EqIA, which indicated that the policy should proceed to a full Equality Impact Assessment (see response to Q25 in the EqIA). This conclusion is not supported by the substance of the screening in the submitted EqIA, including its final response which indicated that, provided Council pursue suitable policy options, any negative impact (on protected characteristics) will be avoided.
- 1.3.11 The Council will continue to be mindful of the PSED in any further modifications and decision making in relation to the Local Plan.

## **Question 2 - Calculation of the objectively assessed need for housing.**

***Are the calculations contained within the west surrey SHMA Guildford addendum report an appropriate basis for establishing the OAN for Guildford? Relevant elements include:***

- ***Migration trends and unattributed population change.***
- ***Student Migration and its impact on the housing market.***
- ***Market signals and the issue of housing affordability.***
- ***The need for affordable housing.***
- ***Employment growth.***
- ***Any other relevant matter.***

- 2.1 Given that this question relates primarily to the SHMA, the Council's response has been prepared with input from GL Hearn.
- 2.2 The Council considers that the methodology and analysis in the SHMA Addendum was robust and provides sets out its justification below. However the latest available evidence in the form of the revised MYE estimates indicates that the starting point for demographic need is lower than that set out in the Addendum. To be consistent with national guidance this latest evidence should be taken into account. The effect is to reduce the starting demographic point to 521dpa, and overall OAN to between 625-632dpa.

### **CONTEXT TO THE PREPARATION OF THE SHMA GUILFORD ADDENDUM**

- 2.3 The housing requirement within the Local Plan was informed by the *West Surrey SHMA: Guildford Addendum Report 2017* (SD-003) prepared by GL Hearn. This identified a need for 12,426 homes in Guildford over the 2015-34 plan period (654 dpa).
- 2.4 The context to the preparation of the Addendum Report is to be found in its Para 1.2. It sought to take into account the latest available information at the time including the 2014-based Population and Household Projections and updated economic forecasts, consistent with Para 2a-016 in the PPG, which stipulates that "*Wherever possible, local needs assessments should be informed by the latest available information.*"
- 2.5 A 2015 base date was used taking account of the then latest ONS Mid-Year Population Estimates. It was not necessary to project population and economic growth prior to 2015, as there was data available (SD-003, Para 3.3). The end point aligned to the plan period, covering 15 years from the point of adoption to accord with NPPF Para 157.
- 2.6 The Council approached both its HMA partners, Waverley and Woking, in Autumn 2016 with a view to commissioning an HMA-wide SHMA Update. However the authorities' plans were at different stages of preparation, with Waverley having undertaken the Regulation 19 consultation on its' Local Plan based on the 2015 SHMA, and Woking not having commenced work on a review of its adopted Core

Strategy. In this context, the three authorities agreed that Guildford would prepare the SHMA Addendum to provide an updated assessment of the OAN for the Borough using a consistent approach and methodology to the 2015 SHMA (SD-003, Para 1.3).

- 2.7 The Addendum Report (SD-003) should be read together with the *Review of Housing Needs Evidence across West Surrey HMA* (SD-004) which considers evidence across the Housing Market Area. The Council actively engaged with its HMA partner authorities on both the scope of the Addendum Report and the draft report.
- 2.8 The approach adopted is consistent with Para 2a-007 in the PPG, which outlines that “where plans are at different stages of production, local planning authorities can build upon the existing evidence base of partner local authorities in their housing market area, but should co-ordinate future housing reviews so they take place at the same time.”

## DEMOGRAPHIC PROJECTIONS

### The Addendum Evidence and UPC

- 2.9 Population growth in Guildford is driven by a combination of positive natural change and net in-migration (SD-003, Figure 1). There is net international in-migration, with internal net out-migration to other parts of the country.
- 2.10 Migration has however varied over time and the evidence has recognised some uncertainties associated with the data for Guildford (see for instance the West Surrey SHMA, SD-001, Section 4 and Appendix B).
- 2.11 In particular, there was a significant level of Unattributable Population Change (UPC), totalling 7,173 persons, over the 2001-11 period (SD-003, Para 3.10) indicating either a Census over-estimate in 2001 or under-estimate in 2011; that ONS had over-estimated net migration to Guildford over the decade; or a combination of these factors.
- 2.12 The Addendum considered the 2014-based Sub-National Population and Household Projections consistent with Para 2a-015 in the PPG. It included sensitivity testing addressing three alternative demographic scenarios: rebasing the SNPP to take account of 2015 MYEs; and 10 year migration scenarios with and without adjustments for UPC (SD-0043, Para 3.31). These projections were treated as a range in drawing conclusions therein (SD-003, Paras 8.3 – 8.6) reflecting the uncertainties regarding migration data and the UPC.
- 2.13 The Addendum also noted uncertainties regarding the impact which Brexit and immigration policy could have on international migration (Paras 3.40 – 3.76).
- 2.14 Based on the available information at the time of its preparation, the consultants identified that it was unclear the degree to which UPC reflects in effect over-estimated migration, and to the degree to which it may have, the biggest impacts where more likely to be in the 2001-6 period given improvements ONS has made to

migration estimates (Para 3.39 – 3.40). Some representors have however commented that Guildford's population had been inflated by an under-recording of out-migration of students, and that this was not necessarily confined to the pre-2011 period. ONS revisions to Mid-Year Population Estimates (considered below) provide some evidence of this.

### Recent Data Releases

- 2.15 Since the preparation of the SHMA Addendum, the ONS has released further information which the Council consider is relevant to the demographic need for housing, specifically:
- Revised Mid-Year Population Estimates for 2012 – 2016, released by ONS in March 2018;
  - 2016-based National Population Projections, released by ONS in October 2017.

#### Revised Mid-Year Population Estimates 2012-2016 (March 2017)

- 2.16 The revised Mid-Year Population Estimates for Guildford take account of an 'improved distribution model' for attributing UK emigration to different areas, taking account of additional data sources which ONS consider results in improved international migration estimates, and better captures outflows from local authorities with student populations. In Guildford the impacts are notable, and ONS has revised downwards Guildford's estimated population in 2016 from 148,020 down to 146,845 – a difference of 1,175 people. These revised MYEs indicate that ONS had previously over-estimated population growth over the 5 year period from 2011-16 by around 13%. The downward revision is a meaningful change and at least warrants a reconsideration of the Addendum Report.
- 2.17 The SNPP are based on trends in domestic migration over the previous five years; and international migration over the previous 6 years, constrained to assumptions in the national population projections. International net-migration to Guildford over the 2008-14 period have been revised downwards from 1,626 persons per year to 1,557 persons per year.<sup>4</sup>
- 2.18 Para 2a-016 in the PPG sets out that in dealing with demographic projections, wherever possible, local needs assessments should be informed by the latest available information. Para 2a-017 is clear that account should be taken of the most recent demographic evidence including the latest ONS population estimates.
- 2.19 In effect, ONS are saying that their previous Mid-Year Estimates had under-estimated emigration, and over-estimated population growth in Guildford Borough. By implication, **the 2014-based SNPP and Household Projections will over-estimate growth and the demographic starting point will have been over-estimated.**

---

<sup>4</sup> Over the 2010-16 period, international net migration is now estimated at 1,559 persons per year (compared to 1,756 persons pa in the now superseded data).

- 2.20 The Council has engaged GL Hearn to consider what impact the revised ONS data could have on its previous findings. Taking account of the most up-to-date information on the Borough's population structure and the revised estimates of migration and the age structure of migration over the input period (2008/9-2014) and Stage 1 headship rates from the 2014-based Household Projections, **GL Hearn estimates that the adjustments to the MYEs would reduce the demographic starting point to 521 dpa**. Full details are set out in Appendix A.

### **2016-based National Population Projections (October 2017)**

- 2.21 The national population projections provide updated information on how fertility, mortality and international migration are expected to change. They assume that birth rates are lower (with the average number of children per woman falling from 1.89 in the 2014-based Projections to 1.84). Based on more recent evidence they no longer assume a faster rate of increase in life expectancy for those born between 1923 – 1938 such that whilst life expectancy increases, it is expected to do so at a slower rate than in the 2014-based Projections. They also assume lower long-term international migration of 165,000 per annum beyond mid-2022, compared to 185,000 in the 2014-based Projections. This is based on a 25 year average. **Each of these factors could be expected to have a further downward impact on housing need in Guildford Borough, if other factors are held constant suggesting that the 521-dpa figure could be conservative.**

### **Upcoming Data Releases**

#### **2016-based Sub-National Population Projections (May 2018)**

- 2.22 ONS is due to release new 2016-based Sub-National Population Projections (SNPP) on 24<sup>th</sup> May 2018 taking the same factors into account as the 2016-National Population Projections. Although the 2016-based Household Projections are not due to be released until September 2018, the 2016-based SNPP should provide a clear indication of what these will show. **The Council proposes to consider the 2016-based SNPP on their release, and update the examination on the implications of these at the Hearings.**

### **Inter-relationships with London**

- 2.23 The 2015 West Surrey SHMA (SD-001) included a sensitivity analysis considering alignment between the 2012-based SNPP and GLA 2013 Central Variant Demographic Projection in order to ensure an alignment of demographic assumptions.
- 2.24 The Addendum reviewed this alignment to take account the latest evidence. Its analysis indicated that there has historically been a level of net internal migration from London to Guildford (in common with many other areas in the Greater South East). It did not find evidence of a particular recessionary effect on flows to Guildford, with levels of net migration from London having remained relatively stable since

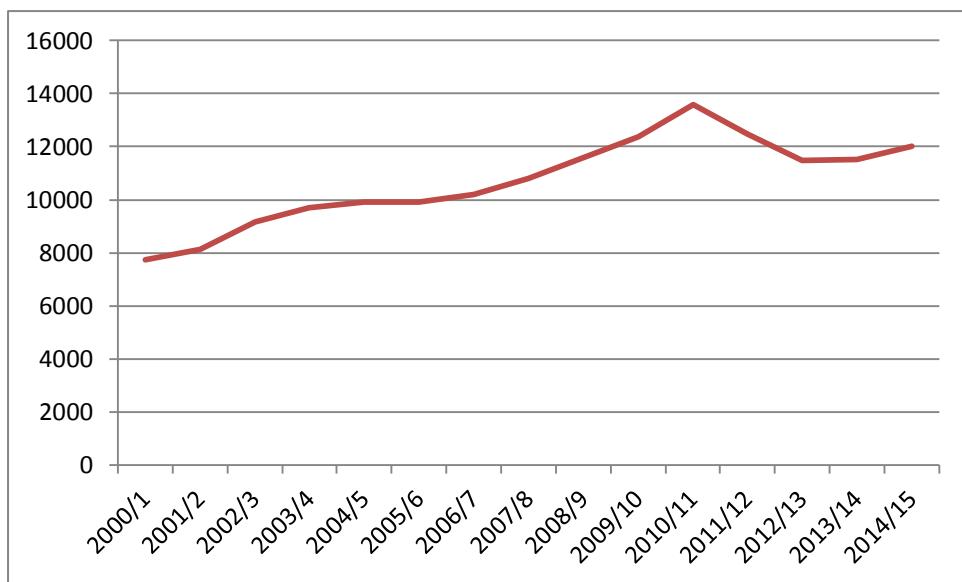
2008-9 (SD-003 Figure 4, p20). Migration from London to Guildford is captured within ONS population projections.

- 2.25 The Addendum found that a 10 year migration scenario (adjusted for UPC) would align with the then latest GLA demographic projections (2015-based), but this indicated a lower demographic need than the 2014-based SNPP. It found on this basis no potential for under-estimating migration and population growth.
- 2.26 Since the preparation of the Addendum (and indeed the Waverley Local Plan Examination), the GLA has published a new SHMA and draft London Plan. The updated London evidence is a material consideration for this plan.
- 2.27 The London SHMA uses the GLA 2016-based Central Projection, which is based on 10 year migration trends with adjustments for UPC. It should be noted however that this projection would have been informed by ONS Mid-Year Population Estimates which have now been superseded (as discussed above).
- 2.28 10 year migration trends to Guildford over the 10 years to 2016, adjusted for UPC would see net migration of 979 persons per annum. This falls below the level of migration over the input period to both the 2014- and 2016-based SNPP, taking account of the revised MYE data. Again, there is therefore no justification for adjusting upwards the demographic need to take account of London migration.
- 2.29 A further consideration is that the London Plan proposes a significant increase in housing provision within London itself. Policy H1 proposes a minimum requirement for 64,935 dwellings per annum (2019/20 -2028/29), significantly higher than the previous plan (42,000 pa). On reasonable assumptions, a significant increase in housing delivery in London can be expected to contribute to reducing market pressures in the wider South East.
- 2.30 On the basis of the current evidence, **the Council does not consider that there can be any justification for adjusting migration to align with demographic assumptions associated with the London Plan evidence base.**

## **STUDENT MIGRATION AND ITS IMPACT ON THE HOUSING MARKET**

- 2.31 Evidence considering the dynamics within the student population and its impact on the housing market are set out within Appendix C to the 2015 West Surrey SHMA (SD-001) and in Section 7 within the Addendum (SD-003).
- 2.32 There are a number of higher education institutions in Guildford, but the main one is the University of Surrey. It is full-time students which are most likely to impact on the Borough's housing market, and **the long-term trend in full-time student numbers has been upwards**. Figure 2.1 below updates Figure C.3 in SD-001 to take account of the latest data.

**Figure 2.1 – Growth in Full-time Students at University of Surrey**



Source: Higher Education Statistics Agency

- 2.33 The Appendix C analysis identified that, based on Census data, students accounted for at least 9.5% of household growth in Guildford between 2001-11.<sup>5</sup>
- 2.34 To achieve appropriate yields, landlords typically target lower value stock, and thus student-driven demand within the private rented sector creates competition with first time buyers for homes, and influences lower quartile house prices. **Student population growth is thus a factor which will have contributed to affordability pressures in the Borough.** Taking this into account, the 2015 SHMA and then the SHMA Addendum, have sought to quantify and provide for student-related growth in the wider housing market.
- 2.35 The Addendum analysis in Section 7 assumed growth in full-time Guildford-based students of 3,800 between 2015-34 based on the University's aspirations for growth. It assessed that this would result in additional migration to Guildford over- and above the 2014-based SNPP, and assumed that 55% of these additional students would be accommodated in halls, and 45% in the wider housing market. On the basis of an average 4 students per household, it calculated that this would equate to growth of 23 additional dwellings per annum. **Providing for this need will contribute to addressing affordability pressures in the Borough.**
- 2.36 The Council will review the inter-relationships between student growth and the 2016-based SNPP when this is published.

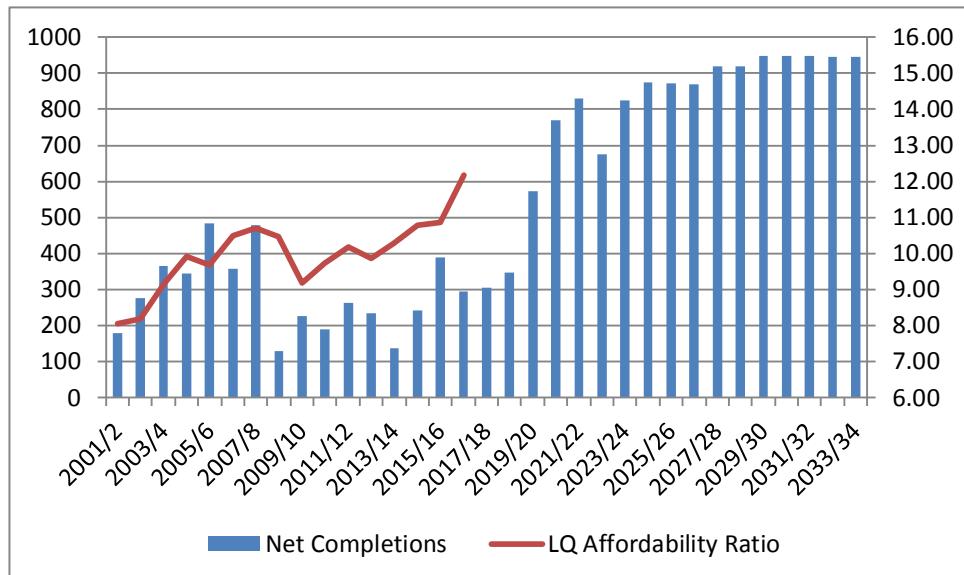
<sup>5</sup> This will exclude students living in halls of residence

## **MARKET SIGNALS AND HOUSING AFFORDABILITY**

- 2.37 The Council has responded to the Inspector's Initial Questions regarding the latest affordability ratios, the way in which the SHMA has addressed market signals and affordable housing need, and the justification for the uplift proposed.
- 2.38 The Council's response to these matters, with a minor update to take account of the 2017 affordability ratios, which have been released since the Initial Questions, is included in Appendix 2.2 (showing additions in tracked changes).
- 2.39 Evidence relating to market signals and affordable housing was considered in Section 5 in the SHMA Addendum (SD-003). The evidence therein recognises these justify an upward adjustment, which should be applied to the demographic starting point.
- 2.40 The SHMA recognises that upward adjustments within the OAN calculation will contribute to increasing the supply of market and affordable housing; and support additional migration and household formation. It first made a 4% upward adjustment through increasing in-migration to Guildford (raising the OAN to 579 dpa). This would contribute both to increasing the supply of market and affordable housing, and to supporting economic growth through increasing the Borough's workforce. To this, secondly, a 9% headship adjustment is also applied (raising the OAN to 631 dpa) enabling higher household formation amongst younger households, and increasing housing supply. Then, thirdly, an adjustment of 4% has been made to take account of student population growth, recognising that this has been one of the factors which has influenced house price growth and affordability in the Borough, raising the OAN to 654 dpa. Combined this represents an adjustment of 17% on the Addendum's starting point demographic projections.
- 2.41 The Council has had regard to the latest ONS affordability statistics but, for the reasons set out more fully in Appendix 2, consider that it is appropriate to assess the affordability position in 2015 as this is the base position of the plan, and adjustment to reflect affordability ratios since this point could introduce double counting. The PPG outlines that a comparative long-term analysis of trends in market signals is appropriate.
- 2.42 The level of affordable housing need is agreed to be high. As explained in Appendix 1, the affordable housing need is not directly comparable with other elements of an OAN calculation; and is sensitive to market housing costs. The Council maintain that the uplift of 17% is appropriate to contribute to improving housing affordability and affordable housing delivery.
- 2.43 Econometric affordability models are not design to answer the question of what level of supply (or increase in supply relative to household projections) would be appropriate at a local authority level, or would improve affordability within Guildford Borough. These models show that market perceptions are important; and in this context the **tripling** of housing delivery which the plan will deliver relative to historic

completions in the Borough is important consideration and can reasonably be expected to improve affordability.

**Figure 2.2 Housing Trajectory relative to Historical Delivery in Guildford Borough**



- 2.44 In SD-004 and its response to the Inspector's Initial Questions, the Council has applied by way of a cross check, independent of its primary analysis in the SHMA and set out below, what it understands to be the approach, or akin to the approach, adopted in the Waverley Local Plan Examination to consider the degree of uplift that needs to be applied to the OAN starting point. This exercise produces a figure of between 14 - 16.5% uplift, which albeit derived from an alternative approach shows that the adjustments made in the SHMA are reasonable.
- 2.45 Adjustments for market signals should be applied to the demographic starting point (consistent with PPG 2a-019)<sup>6</sup> and it is a material consideration that the latest evidence now points to a lower starting point figure.

## EMPLOYMENT GROWTH

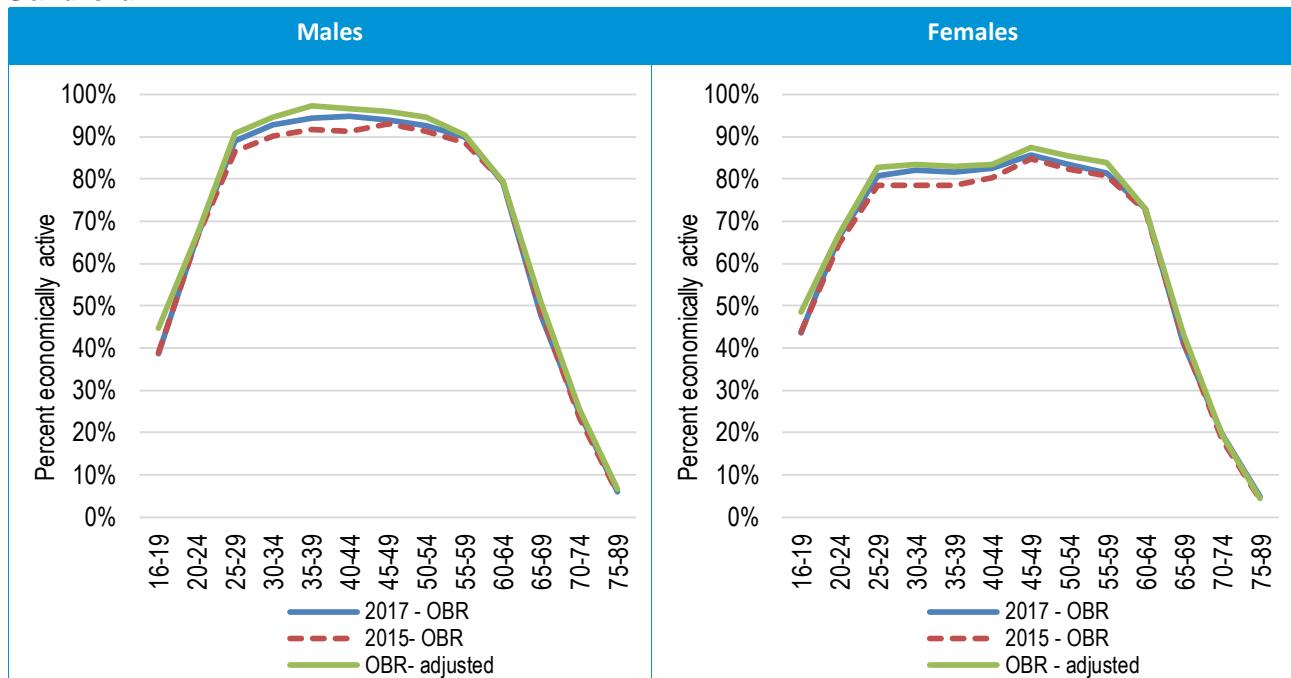
- 2.46 The economic-led housing need is considered in Section 4 in the SHMA Addendum. Employment growth was estimated by Aecom by applying the average growth rate in employment of three independent forecasts from Cambridge Econometrics, Oxford Economics and Experian (0.7% pa) to the estimated workplace employment in the Borough in 2015 (91,500 jobs). This results in workplace employment growth of 12,900 over the plan period. The approach is consistent to that in the Employment Land Needs Assessment 2017 (SD-007).
- 2.47 The forecast rate of jobs growth is lower than that seen historically, but this is consistent with the position expected nationally by all of the main forecasting houses.

<sup>6</sup> This is logical in that upward adjustments to this will all serve to increase housing supply, delivering additional market and affordable housing.

Past jobs growth trends in the Borough are taken into account in the forecasts (they are trend-based forecasts), alongside the Borough's sectoral structure and expected future performance of different economic sectors. The projected employment is thus based on long-term sector trends, which capture multiple economic cycles (periods of growth and contraction) in the economy.

- 2.48 There clearly remains uncertainty regarding what Brexit deal may be negotiated and the impact on the UK economy, but an appropriate way to address this is to monitor dynamics and review local plans over time.
- 2.49 The lower forecast economic growth in Guildford relative to that set out in the 2015 SHMA does not represent a redistribution of growth between the HMA authorities, but an overall downgrading of the forecasts across the HMA, but with Guildford seeing the strongest reductions. This is a function of the sectoral make-up of the Borough's economy.
- 2.50 Taking account of commuting patterns based on the 2011 Census, and an allowance for double jobbing, the Addendum indicates that workforce growth of 11,100 persons in the Borough would be required to support this (Table 19, p38). Compared to this, the Addendum indicated that the 2014-based SNPP would support workforce growth of between 11,000 – 12,400 (Tables 14-16, p35). This was based on alternative assumptions on economic participation from the Office for Budget Responsibility (OBR), Experian and the 2015 SHMA assumptions.
- 2.51 In drawing conclusions, GL Hearn took the middle economic participation scenario (OBR Adjusted) which indicated a need for 579 dpa (Para 4.32). This was to ensure that the assessment was based on realistic assumptions on improvements in economic participation. There is no evidence that cohort effects in Guildford will result in a reduction in economic participation amongst men under 55 and women under 44.
- 2.52 Updating the analysis to take account of the revised Mid-Year Population Estimates points to an economic-led need for 610 dpa (see Appendix 1).
- 2.53 There are a number of factors which however would now suggest that a lower level of housing provision than 610 dpa would be needed to support the jobs growth.
- 2.54 Firstly, the OBR economic participation rates in the Addendum were based on the 2015 Fiscal Sustainability Report. OBR has since updated these in its 2017 Fiscal Sustainability Report modelling labour market entry and exit rates using averages over the 19 years to 2015, with this latest evidence pointing to stronger expected increases in economic participation. This is shown visually in Figure 2.3 below. Taking this into account, an economic-led need for 602 dpa is shown.

**Figure 2.3 OBR 2015 and 2017 Economic Participation Assumptions applied to Guildford**



Source: Based on OBR and Census (2011) data

- 2.55 Secondly, the revisions which ONS has made to mortality assumptions in the 2016-based National Population Projections can be expected to have a downward impact on the housing provision necessary to support this level of jobs growth.

## DRAWING TOGETHER

- 2.56 The 2014-based Household Projections point to a housing need of 557 dpa, with the Addendum concluding that the demographic need fell between 521-584 dpa. However in March 2018 the ONS indicated that it considers that emigration from Guildford has been under-estimated over the 2011-16 period, and population growth estimates have consequently been revised downwards. This clearly indicates that the 2014-based Household Projections are likely to have over-estimate housing need. The latest available information therefore points to a revised demographic starting point of around 521 dpa, which is materially lower than that identified within the SHMA Addendum.
- 2.57 New 2016-based Sub-National Population Projections are due to be issued on 24<sup>th</sup> May 2018 which the Council will consider on their release and update the examination at the Hearings.
- 2.58 The Council has reviewed, and does not consider that there is a basis for adjustments to align with, the latest London Plan evidence. Furthermore the draft London Plan proposes a significant increase to housing provision within the Capital itself, which on reasonable assumptions should assist in moderating market pressures in Guildford Borough.

- 2.59 There has been a long-term upward trend in full-time students at the University of Surrey, which compete for housing with other groups, contributing to affordability pressures in the Borough. The University's aspirations for growth will result in additional migration to Guildford and the Council continues to consider that it is reasonable to include a modest adjustment of 23 dwellings per annum, not least to contribute to addressing lower quartile affordability pressures in the local market.
- 2.60 The Council has had regard to the latest statistics on affordability, but does not consider that this warrants additional adjustments to the conclusions drawn on the market signals adjustment. It further considers that the correct approach is to consider the affordability position at the base date of the plan in 2015.
- 2.61 The level of affordable housing need is agreed to be high, but the uplifts proposed from the starting point within the OAN calculations will contribute to improving both market housing affordability and affordable housing delivery.
- 2.62 In responding to the market signals and affordable housing evidence an adjustment was made to **both** migration and household formation which in the SHMA Addendum represented an uplift of 17% on the starting point household projections. The upward adjustments made from the starting point will contribute to increasing market and affordable housing supply. Delivery of the planned housing will represent a tripling of housing delivery relative to historical completions in the Borough, which on reasonable assumptions can be expected to materially improve affordability.
- 2.63 A separate analysis was undertaken which considers what the Council understands to be the approach, or akin to the approach, adopted in the Waverley Local Plan Examination, to cross-check the degree of uplift that might be applied to be applied to the OAN starting point. This exercise results in an uplift of between 14-16.5% (see Appendix 2). This confirms that the upwards adjustments to the demographic starting point made within the SHMA Addendum were reasonable.
- 2.64 The Council has triangulated economic forecasts in drawing conclusions on the economic-led need for housing. The forecasts themselves are influenced by past trend over multiple economic cycles, as well as the structure of Guildford's economy and how different sectors are expected to perform moving forwards. Taking account of the revised MYEs, the evidence indicates that between 602 – 610 dpa would be required to support economic growth. This includes upward adjustments to migration from the revised demographic starting point, and adjustments to household formation rates.
- 2.65 A reduction in the demographic need, based on the latest available evidence, will clearly influence the baseline to which a market signals adjustment should be applied. The latest evidence points to a revised starting point demographic need of 521 dpa. It continues to be appropriate to make an upwards adjustment to migration to support economic growth and student migration; and to household formation rates (returning rates for 25-34 year olds to 2001 levels). These adjustments will increase market and affordable housing supply. This results in **an OAN of 625-632 dpa**, which is 20-21% above the demographic starting point (See Appendix A). The

Council does not consider that any further adjustment for market signals is warranted.

- 2.66 Accordingly, **whilst the Council considers that the methodology and analysis in the SHMA Addendum was robust, the latest available evidence in the form of the revised MYE estimates indicates that the starting point for demographic need is lower than that set out in the Addendum. To be consistent with national guidance this latest evidence should be taken into account. The effect is to reduce the starting demographic point to 521dpa, and overall OAN to between 625-632dpa.**

## **Appendix 2.1**

**(Prepared by GL Hearn for Guildford Borough Council, May 2018)**

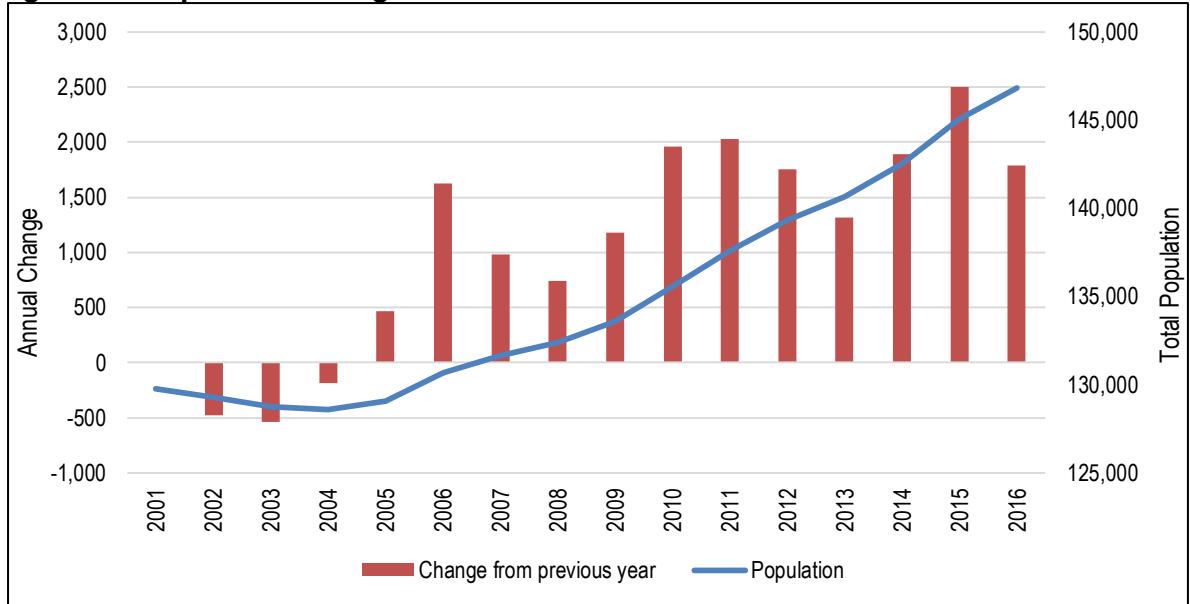
### **POTENTIAL IMPACT OF NEW POPULATION ESTIMATES IN GUILDFORD**

- 2.1.1 This Appendix reviews the implications of the revised ONS Mid-Year Population Estimates for Guildford released by ONS in March 2018. It also comments on changes which ONS has made in its 2016-based National Population Projections (NPP) published in October 2017 which provide an updated assessment about how fertility, mortality and international migration are projected to change moving forward from 2016.
- 2.1.2 The revised Mid-Year Population Estimates use an ‘improved distribution model’ for emigration estimates. This recalculates estimates of emigration based on a greater range of information including additional administrative sources, which ONS sets out will better capture outflows from local authorities with student populations. This particularly impacts Guildford. Adjustments have also been made to immigration figures for 2015 and 2016; and in respect of armed forces personnel.
- 2.1.3 The revised MYEs have a notable impact on population data for Guildford: ONS has reduced its estimate of the population in 2016 from 148,020 down to 146,845 – a difference of around 1,200 people, suggesting that it had previously over-estimated population growth between 2011-16 by over 200 per annum.
- 2.1.4 ONS is due to issue new 2016-based Sub-national Population Projections on 24<sup>th</sup> May 2018. These will take account of the revised MYE data, and align with assumptions in the 2016-based National Population Projections.
- 2.1.5 What this Appendix seeks to do is to consider and assess the potential impacts of the revised MYEs on population growth in Guildford.

#### **Population Trends in Guildford**

- 2.1.6 The figure below shows population growth from 2001 to 2016, using data from ONS mid-year population estimates (MYE) as revised in March 2018. This shows a population decline in the period to about 2004, followed by a period of steady population increase, including in the 2014-16 period – the period that post-dates the 2014-based population/household projections.

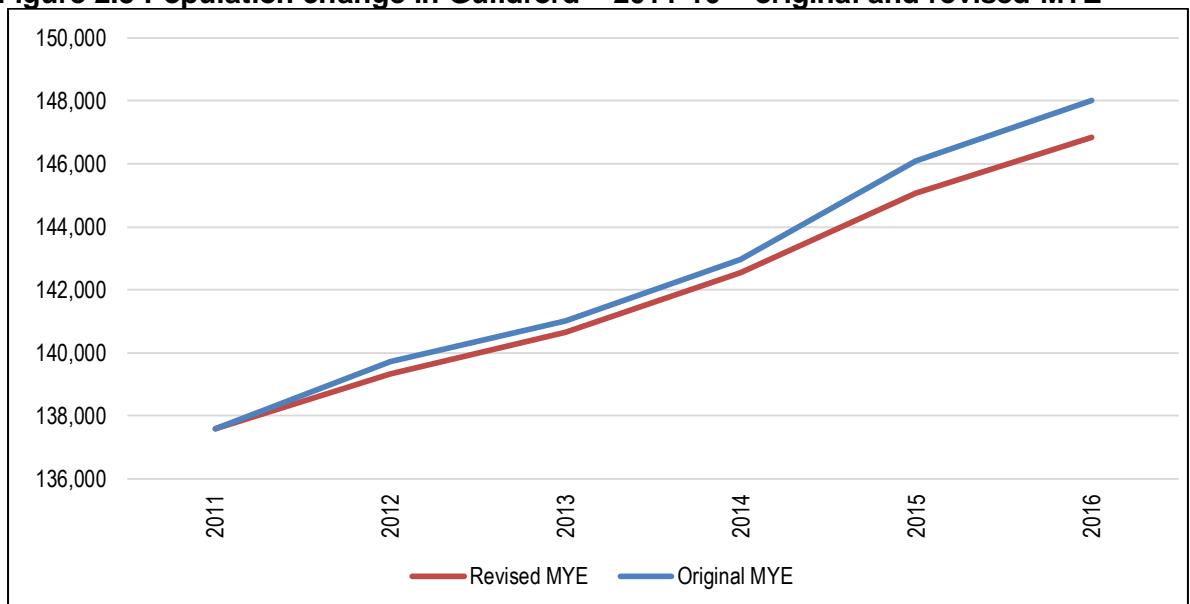
**Figure 2.4 Population change in Guildford – 2001-16**



Source: ONS

- 2.1.7 Figure 2.5 below shows a comparison between the original MYE and the revised figures; data is only shown for the 2011-16 period as this reflects the period over which revisions were made. This clearly shows that ONS now estimate population growth to have been somewhat lower than previously suggested. It should be noted that the ‘original’ figures (to mid-2014) will have informed the 2014-based SNPP – the starting point projections considered in the SHMA Addendum (SD-003).
- 2.1.8 The difference in the two estimates in 2016 is 1,175 people. ONS estimates emigration to have been 1,180 people higher than it did previously, along with a very modest adjustment to immigration.

**Figure 2.5 Population change in Guildford – 2011-16 – original and revised MYE**



Source: ONS

2.1.9 Table 2.1 provides a revised assessment of the components of population change in Guildford Borough over the 2001-16 period. It shows that international net migration is an important driver of population growth in the Borough.

**Table 2.1 - Components of population change, mid-2001 to mid-2016 – Guildford**

	Natural change	Net internal migration	Net international migration	Other changes	Other (unattributable)	Total change
2001/2	386	-199	57	11	-732	-477
2002/3	422	-498	329	-65	-722	-534
2003/4	429	-105	-44	263	-731	-188
2004/5	374	27	739	46	-718	468
2005/6	492	720	1,118	6	-706	1,630
2006/7	558	101	1,039	-8	-707	983
2007/8	634	5	859	-54	-699	745
2008/9	613	65	1,173	42	-710	1,183
2009/10	622	-150	2,097	114	-720	1,963
2010/11	689	22	1,934	116	-728	2,033
2011/12	641	40	1,239	-162	0	1,758
2012/13	584	-727	1,414	48	0	1,319
2013/14	521	123	1,487	-237	0	1,894
2014/15	422	-71	1,470	684	0	2,505
2015/16	471	-573	1,809	82	0	1,789

Source: ONS

2.1.10 The revisions to the mid-year population estimates are significant in the context of the Local Plan Examination, not least as the 2014-based Sub-National Population Projections (SNPP) were based on migration data, which has since been superseded. The forthcoming 2016-based SNPP will take into account the revised MYEs.

2.1.11 The table below compares net migration estimates from the original and revised MYE series for Guildford. The final two rows of the table show the average level of net migration in the base period used for the 2014-based and to be used for the 2016-based subnational population projections (SNPP). The SNPP project forward internal migration based on trends over the preceding five years, and international migration over the previous 6 years constrained to the assumptions made in the national projections.

2.1.12 International migration to Guildford in the 2008-14 period overall has been revised to be lower than previously estimated (although it was very slightly higher in 2012/13). This is the input period to the 2014-based SNPP.

2.1.13 There is a net internal out-migration from Guildford. This averaged 138 persons pa over the five years to 2014. It has increased, with average net out-migration of 242 persons pa over the five year to 2016.

2.1.14 Over the 6 years to 2014 international migration to Guildford averaged 1,557 persons pa (down from the 1,626 previously estimated). Over the six years to 2016 a similar

figure (1,559 persons pa) is shown. The updated estimates of emigration in particular are significant.

**Table 2.2 - Comparing migration assumptions in the original and revised MYE for Guildford**

	Original MYE		Revised MYE	
	Net internal migration	Net international migration	Net internal migration	Net international migration
2001/2	-199	57	-199	57
2002/3	-498	329	-498	329
2003/4	-105	-44	-105	-44
2004/5	27	739	27	739
2005/6	720	1,118	720	1,118
2006/7	101	1,039	101	1,039
2007/8	5	859	5	859
2008/9	65	1,173	65	1,173
2009/10	-150	2,097	-150	2,097
2010/11	22	1,934	22	1,934
2011/12	40	1,615	40	1,239
2012/13	-727	1,396	-727	1,414
2013/14	123	1,540	123	1,487
2014/15	-71	2,085	-71	1,470
2015/16	-573	1,964	-573	1,809
Input period to 2014-based	-138	1,626	-138	1,557
Input period to 2016-based	-242	1756	-242	1,559

Source: ONS

### Detailed Analysis of Migration Data

2.1.15 We have also sought to assess the age profile of in- and out-migration.

#### Internal migration

2.1.16 Net internal migration figures have not been revised from the original and revised MYE, but it is necessary to consider if there have been any notable changes to levels of in-and out-migration, and also if the age structure of migration has changed. The table below shows gross in- and out-migration and data about the average level in the input period to the 2014- and 2016-based SNPP (the preceding five years).

2.1.17 The data does however show that in-migration to Guildford has increased, and out-migration has also increased (and by a greater amount). As a result, overall, net internal migration is lower in the 2016-base period than the 2014-base period.

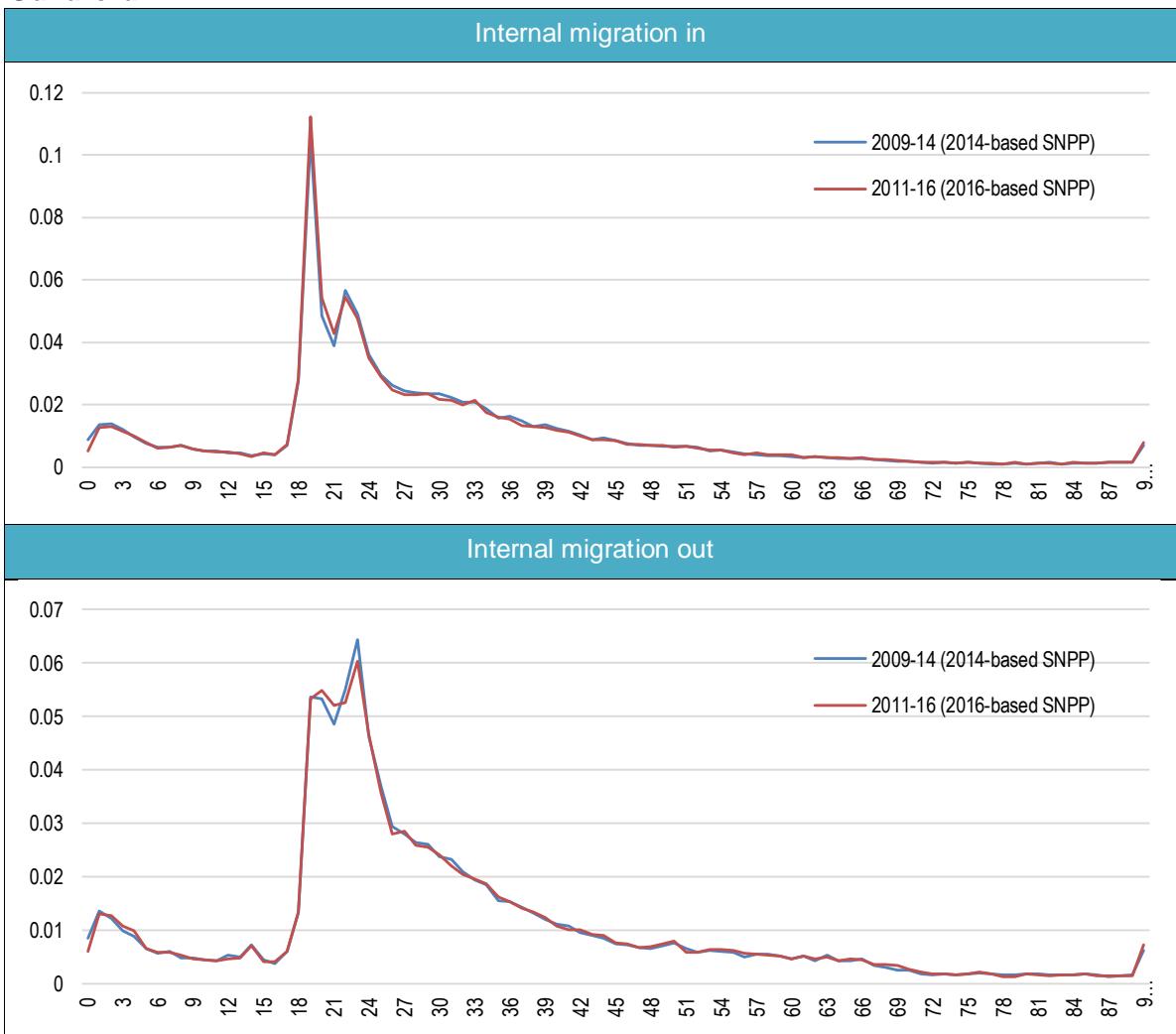
**Table 2.3 – Comparing internal gross in- and out-migration in Guildford for different projection base periods**

	In-migration	Out-migration
2001/2	9,978	10,177
2002/3	9,744	10,242
2003/4	9,964	10,069
2004/5	10,144	10,117
2005/6	10,504	9,784
2006/7	10,414	10,313
2007/8	10,650	10,645
2008/9	9,493	9,428
2009/10	9,960	10,110
2010/11	9,840	9,818
2011/12	10,449	10,409
2012/13	9,520	10,247
2013/14	10,840	10,717
2014/15	10,712	10,783
2015/16	10,228	10,801
2014-based	10,122	10,260
2016-based	10,350	10,591
Difference	228	331

Source: ONS

2.1.18 Figure 2.6 considers the age structure of internal in- and out-migration for the input period for the 2014- and 2016-based SNPP (the preceding five years). Generally, migration patterns are similar regardless of the time period used. There are some small differences, and these are likely to be reflected in the next SNPP. However, it is notable that there have not been any major changes in data for different time periods.

**Figure 2.6 – Age structure of internal migration in different base periods – Guildford**



Source: ONS

#### International migration

- 2.1.19 A similar analysis has been undertaken with regard to international migration. Table 2.4 shows data from both the original and revised MYE along with average migration for different base periods. For the 2016-base period that both in-and out-migration are slightly lower than for the 2014-base period. Overall, net migration is about 70 people lower in the more recent period.
- 2.1.20 Table 2.4 shows that figures for international out-migration from Guildford (emigration) post 2011 have been revised upwards in the revised MYEs. **Emigration over the 2009-14 period has been revised upwards from 1,606 persons per annum in the original MYE series to 1,674 persons per annum. It has also been revised up over the six year input period to the 2016-based SNPP.**

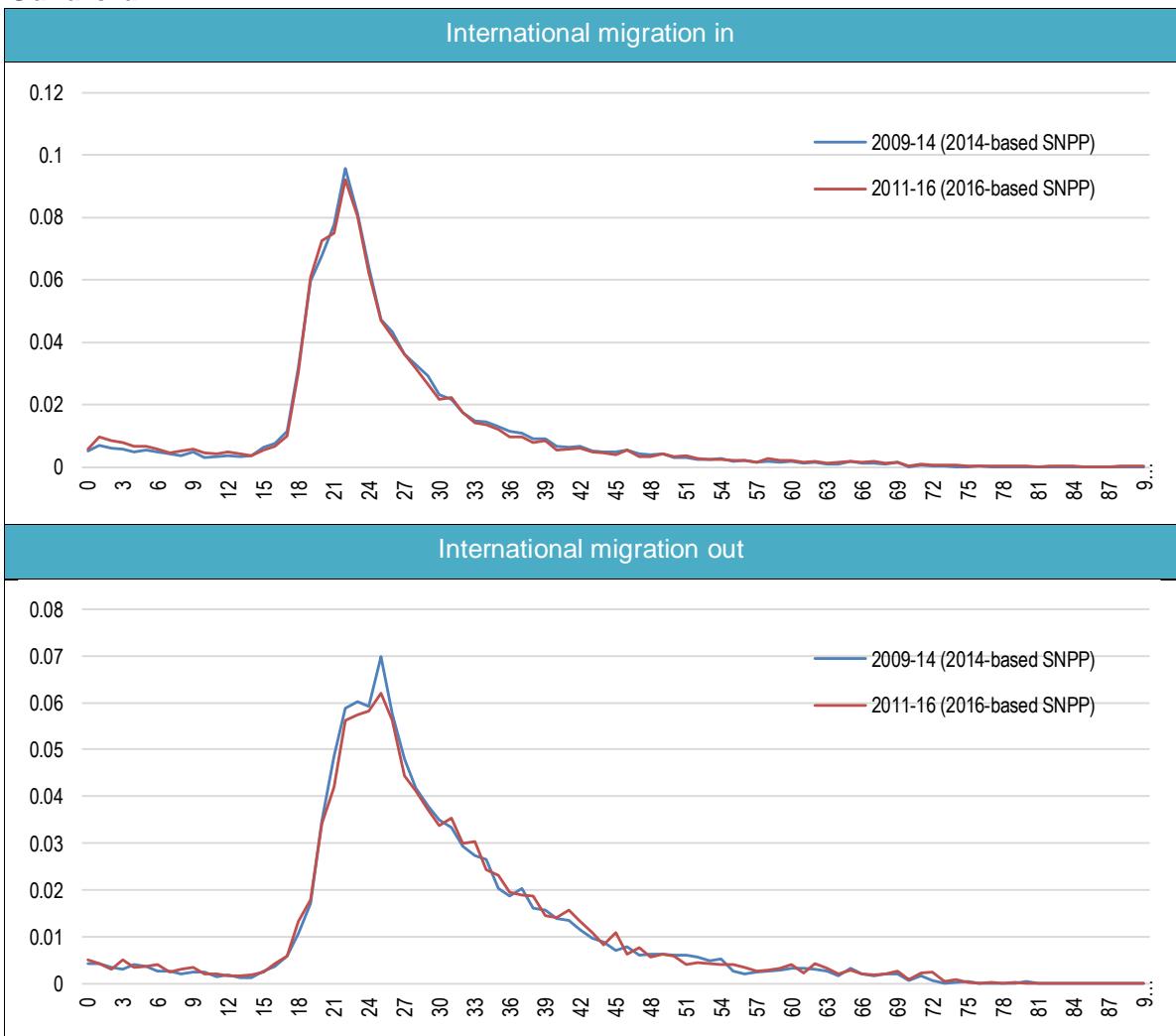
**Table 2.4 – Comparing migration assumptions in the original and revised MYE for Guildford**

	Original MYE		Revised MYE	
	In-migration	Out-migration	In-migration	Out-migration
2001/2	2,049	1,992	2,049	1,992
2002/3	2,180	1,851	2,180	1,851
2003/4	2,452	2,496	2,452	2,496
2004/5	2,631	1,892	2,631	1,892
2005/6	3,104	1,986	3,104	1,986
2006/7	3,464	2,425	3,464	2,425
2007/8	3,008	2,149	3,008	2,149
2008/9	3,277	2,104	3,277	2,104
2009/10	3,511	1,414	3,511	1,414
2010/11	3,737	1,803	3,737	1,803
2011/12	3,179	1,564	3,177	1,938
2012/13	2,823	1,427	2,823	1,409
2013/14	2,865	1,325	2,865	1,378
2014/15	3,268	1,183	3,015	1,545
2015/16	2,956	992	3,210	1,401
2014-based	3,232	1,606	3,232	1,674
2016-based	3,138	1,382	3,138	1,579

Source: ONS

- 2.1.21 Figure 2.7 below shows the age structure of international migration. As with internal migration there are some small differences, but generally, migration patterns are similar regardless of the time period used.

**Figure 2.7 Age structure of international migration in different base periods – Guildford**



Source: ONS

### Conclusions on Migration

2.1.22 The main change to the revised MYEs come from use of an updated emigration model. This uses an unchanged national estimate of the number of emigrants, drawn from the International Passenger Survey. It however reflects improvements which ONS has made to the way this is distributed by local authorities. The improvements include:

- a greater range of explanatory variables (6 variables to 16) accounting for a wider range of drivers of emigration
- use of additional administrative sources, reducing reliance on less timely 2011 Census data and sample surveys, which are volatile at the local level
- future-proofing of the model through updated research to reflect current trends and patterns

2.1.23 The explanatory variables used by ONS in the model that calculated each area's share of emigration previously included no variables directly related to students. ONS has set out that the updated model better captures outflow from student areas by

including variables that increase an area's share of emigration with higher levels of immigration in the mid-year estimates and of EU students in their final year of higher education aged 20 to 25 years. This has the result of increasing the emigration in areas that are dominated by students and, in particular, EU students.

2.1.24 The latest data therefore suggests that **emigration from Guildford has been under-estimated in previous ONS data, including that feeding into the 2014-based SNPP**. These projections can therefore be expected to over-estimate population (and therefore household) growth.

2.1.25 There is little difference between net international migration in the input period to the 2014- and 2016-based SNPP (the preceding six years); however levels of net internal out-migration are higher over the 2011-16 period than they were over the five year period feeding into the 2014-based Projections. Holding all other factors equal, this could also be expected to have a downward impact on population projections.

### **Implications for the 2014-based 'Demographic Starting Point'**

2.1.26 The table below shows estimated international in- and out-migration in both the original MYE and revised figures. Net figures are also provided. The data covers the six years to mid-2014 as this is the period over which ONS will have looked when developing the projections. The analysis shows that the average net migration has reduced by about 69 people per annum over the 2008-14 period between the two MYE releases.

**Table 2.5 – Average levels of international in- and out-migration (Guildford) – 2008-14**

	Original MYE			Revised MYE		
	In-migration	Out-migration	Net migration	In-migration	Out-migration	Net migration
<b>2008/9</b>	3,277	2,104	1,173	3,277	2,104	1,173
<b>2009/10</b>	3,511	1,414	2,097	3,511	1,414	2,097
<b>2010/11</b>	3,737	1,803	1,934	3,737	1,803	1,934
<b>2011/12</b>	3,179	1,564	1,615	3,177	1,938	1,239
<b>2012/13</b>	2,823	1,427	1,396	2,823	1,409	1,414
<b>2013/14</b>	2,865	1,325	1,540	2,865	1,378	1,487
<b>Average</b>	3,232	1,606	1,626	3,232	1,674	1,557

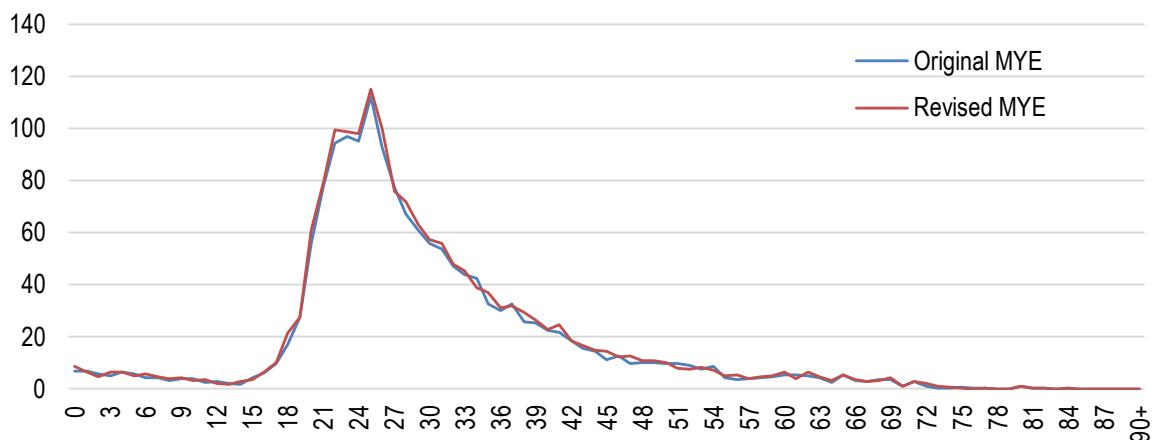
Source: ONS

2.1.27 It is possible to use this difference in figures to model what assumptions about international migration ONS would have been likely make in terms of the overall level of migration. The ONS method looks at the share of migration in each area and then apportions national level assumptions on the basis of this proportion. A similar approach has been adopted herein – and in doing so it is estimates that international net migration would fall by an average of about 66 people per annum (slightly less than the actual difference of 69). Applying consistent assumptions on headship vacancy rates to the SHMA Addendum, the changed migration would see the demographic starting point for calculating Guildford's OAN reducing from 557 dwelling per annum to 521 dpa.

2.1.28 As well as the overall level of migration, it is possible to look at any changes in the age structure. As can be seen from the table above, it is only in the case of out-migration (emigration) that there are any notable changes in the figures. The analysis below therefore focusses on this. As can be seen, whilst the profile of emigration does not differ substantially depending on the MYE version used it is the case that there are some differences; the most notable is that ONS now estimates a slightly higher level of emigration of young adults (e.g. those aged about 18-30).

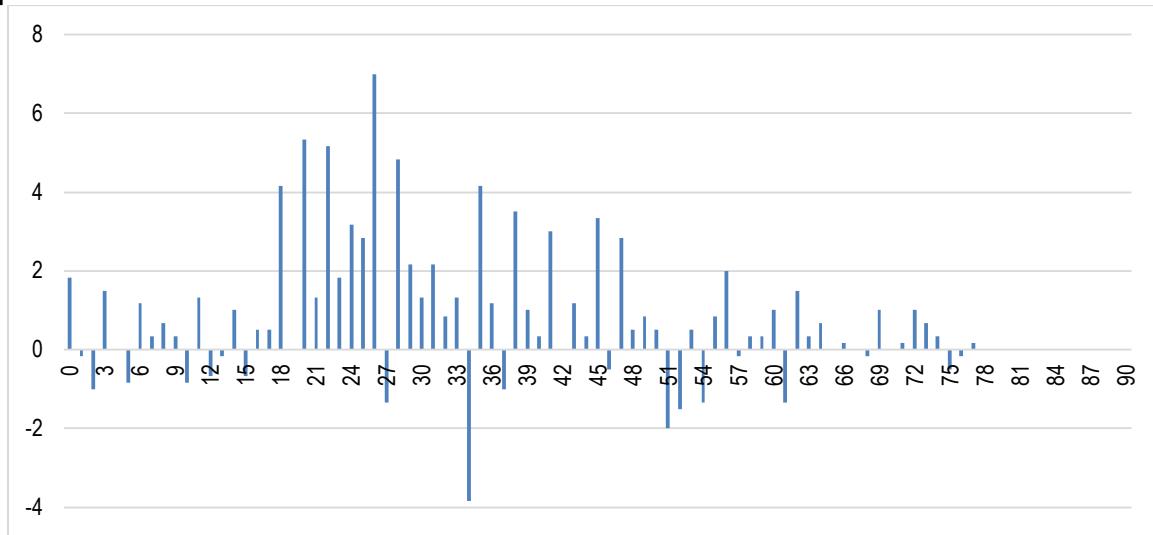
2.1.29 We have additionally modelled a scenario where the profile of out-migration is changed to reflect the differences shown below (whilst keeping overall levels as previously calculated (i.e. reducing by an average of 66 people per annum in the projection). This does not seem to have any further impact on the starting point and it is concluded that **if ONS had used the revised MYE when developing the 2014-based SNPP then the associated housing need (assuming no changes to the household representative rates in the 2014-based projections) would have been for 521 dpa rather than 557 dpa** (including a 2.3% vacancy allowance).

**Figure 2.8 – Age structure of international out-migration (emigration) from different MYE releases (Guilford) – averages for 2008-14 period**



Source: ONS

**Figure 2.9 – Difference between revised and original MYE estimates of average annual out-migration (emigration) by age(Guilford) – averages for 2008-14 period**



Source: ONS

### Implications for Guildford's OAN

- 2.1.30 The lower demographic starting point does not mean that the OAN necessarily falls. It is appropriate to consider adjustments made in the SHMA Addendum to migration and household formation. We wider assumptions in the Addendum have therefore been overlaid:
- Workforce employment growth of 12,893 over the plan period
  - Commuting ratio of 0.90, held constant
  - OBR economic participation assumptions
  - Adjustments to headship rates returning that for 25-34 year olds to 2001 levels

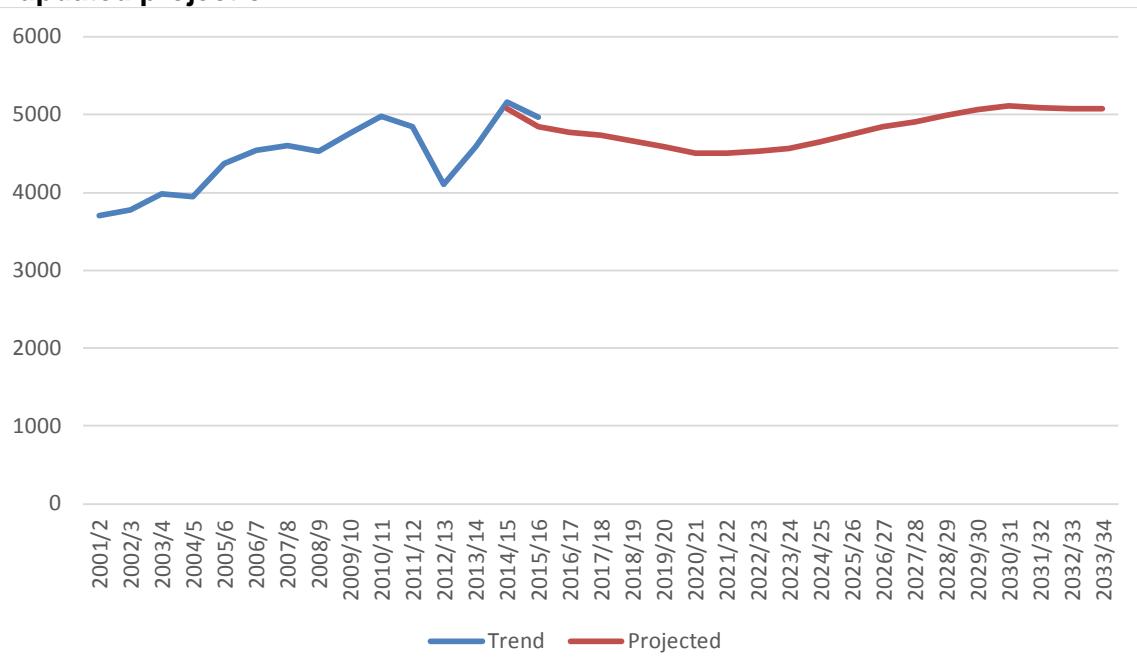
- 2.1.31 The results are show below. An economic led need (including the headship adjustment responding to the market signals evidence) is shown of 610 dpa using the 2015 OBR economic participation assumptions. If the more recent OBR assumptions from the 2017 Fiscal Sustainability Report are used, this falls to 602 dpa. The equivalent SHMA Addendum figure was 631 dpa.

**Table 2.6 – Revised OAN before Student Adjustment**

dpa, 2015-34	OBR 2015 (No Reductions)	OBR 2017 (No Reductions)
Demographic Starting Point	521	
Economic-led Need	610	602

- 2.1.32 To address affordability associated with students, it is appropriate to again include the student adjustment of 23 dpa. Added to the above figures **this would result in an OAN of between 625-632 dpa.**

**Figure 2.10 – Past and Projected In-Migrants aged 18-23 to Guildford Borough in updated projection**



Source: ONS and demographic projections

### 2016-based National Population Projections

2.1.33 In October 2017, ONS published a new set of (2016-based) National Population Projections (NPP). These project notably lower population growth than in the previous (2014-based) set, with the UK population projected to be 2 million fewer in mid-2041. This is driven by lower assumptions about future birth rates and international migration, and an assumption of a slower rate of increase in life expectancy. The key differences are:

- ONS' long-term international migration assumptions have been revised downwards to 165,000 pa (beyond mid 2022) compared to 185,000 in the 2014-based Projections. This is based on a 25 year average;
- The latest projections assume that women will have fewer children, with the average number of children per woman expected to be 1.84 compared to 1.89 in the 2014-based Projections. This takes account of more recent data; and
- ONS is no longer assuming a faster rate of increase in life expectancy of those born between 1923 – 1938, based essentially on more recent evidence. Life expectancy still increases, just not as fast as previously projected. Again this reflects more recent trends.

2.1.34 In due course, the key assumptions at a national level will be translated into the next SNPP, due on 24<sup>th</sup> May 2018. However these factors are likely to have a downwards impact on the demographic need for housing.

## **Appendix 2.2 Initial Questions Response on Market Signals and Affordable Housing Need (Updated)**

- 2.2.1 This section has been updated from that included in the Council's response to the Inspector's Initial Questions. Updated text is shown underlined.
- 2.2.2 The Council considers it important to note that its situation is materially different from that at the Waverley Local Plan examination where a total of 5% uplift to the demographic starting point had been proposed (SD-001, Figure 63). In Guildford, by contrast, the SHMA Addendum concludes that a 17% uplift is appropriate in drawing conclusions on OAN (SD-003, Para 8.21).
- 2.2.3 The Council recognises the need to increase housing delivery nationally above the household projections. Government has provided a framework for doing so through the NPPF and Planning Practice Guidance (PPG). This sets out an approach whereby upward adjustments can be made to the demographic starting point where appropriate in response to evidence relating to economic growth, market signals and the need for affordable housing. The SHMA evidence has followed this approach. In doing so it recognises that there are interactions between these issues. Upward adjustments from the demographic starting point in an OAN calculation will deliver both additional market and affordable housing. An upward adjustment in response to market signals may also result in additional in-migration to an area, supporting workforce growth within it.
- 2.2.4 Section 5 in the SHMA Addendum reviewed market signals and the evidence of affordable housing need. The evidence therein clearly accepts that the market signals evidence and the scale of affordable housing need means that an upward adjustment to assessed housing need relative to the demographic starting point is appropriate (SD-003, Paras 5.28, 5.40, 5.44 and 8.14).
- 2.2.5 The SHMA logic was that the Council should be planning for the new houses built to be occupied at the local level. On this basis, upward adjustments within an OAN calculation mean that additional households are required to occupy them. This means either higher net migration or higher household formation within the local authority concerned (SD003 Para 5.46).
- 2.2.6 It is not appropriate to categorise the SHMA Addendum's response to market signals and affordable housing need as just the headship adjustment (9%). The evidence includes adjustments to migration in addition to household formation (SD-001, Paras 5.46 – 5.48).
- 2.2.7 The PPG (2a-019) outlines that the appropriate adjustments for market signals should be considered relative to the starting point household projections. Paragraph 8.3 (deriving from Table 9, p.27) in the Addendum's Conclusions sets out that this starting point in Guildford is 557 dpa<sup>7</sup>. However as considered in its Matters Statement, the latest evidence from ONS indicates that this is likely over-estimated.

---

<sup>7</sup> This was an increase from 517 dpa identified in the 2015 SHMA, see paragraph 2.2 of the 2017 Addendum.

The Council estimates a revised figure of 521 dpa. The Council will update the examination in due course on the implications of the 2016-based SNPP.

- 2.2.8 As explained above, the SHMA recognises that upward adjustments within the OAN calculation will contribute to increasing housing supply of market and affordable housing; and supporting additional migration and household formation. The SHMA first made a 4% upward adjustment through increasing in-migration to Guildford (raising the OAN to 579 dpa<sup>8</sup>). This will both contribute to increasing the supply of market and affordable housing, and to supporting economic growth through increasing the Borough's workforce.
- 2.2.9 To this, secondly, a 9% adjustment to headship rates is also applied (raising the OAN further to 631 dpa<sup>9</sup>) enabling higher household formation amongst younger households as well. Again this will contribute to increasing the supply of both market and affordable housing.
- 2.2.10 Then, thirdly, a further adjustment was made to take account of student population growth, recognising the SHMA evidence that student growth (and associated competition with other groups within the population for housing) has been one of the factors which has influenced the local housing market and been driving house price growth and affordability issues in the Borough. Thus it is a relevant factor to have regard to when considering affordability. This adjustment of 4% raises the OAN to 654 dpa, and in doing so contributes to relieving pressure on market housing.<sup>10</sup> It should be borne in mind that this is based on relatively aspirational growth expectations of the University (SD003, Para 7.6) so is in that sense a 'worst case' basis.
- 2.2.11 The aggregate impact is a combined adjustment of 17%<sup>11</sup> in the SHMA Addendum on the starting point demographic projections in drawing conclusions on Guildford's OAN.
- 2.2.12 In contrast for Waverley, the 2015 West Surrey SHMA applied a 5% upward adjustment in response to the market signals evidence, raising the need from the demographic starting point of 493 dpa to 519 dpa. No adjustments to migration were made, in contrast to the situation in Guildford, and thus the Waverley OAN was 5% above the household projections.
- 2.2.13 In addressing market signals and affordable housing need, the SHMA's approach has one of considering what the evidence shows about the scale of pressures, but also to consider objectively how an uplift can be quantified which, on reasonable assumptions, can be expected to improve affordability.

**(a) The Deterioration in the Affordability Ratio**

---

<sup>8</sup> Table 20 and paragraph 4.32 as taken forward in paragraph 5.47 and then Table 36 and paragraph 8.10 of the Addendum SD-003.

<sup>9</sup> Figure 16 as taken forward in paragraph 8.17 of the Addendum SD-003.

<sup>10</sup> See paragraph 7.14 as taken forward to paragraph 8.20 of the Addendum SD-003.

<sup>11</sup> As identified at paragraph 8.21 of the Addendum.

2.2.14 The Council is aware that there was deterioration in the affordability ratio between 2014-16. Data has also now been published for 2017. The data indicates that the median (workplace-based) house price/income ratio<sup>12</sup> increased from 11.0 to 12.0 between 2014-16 and to 12.5 in 2017; and the LQ ratio increased from 10.8 to 12.2 in 2016 and 12.8 in 2017. The relevant figures are set out in Table 2.7.

**Table 2.7 – Change in LQ Ratio (Workplace-based) in Guildford, 2014-17**

	2014	2015	2016	2017
Median	11.0	11.2	12.0	<u>12.5</u>
LQ	10.8	10.9	12.2	<u>12.8</u>

Source: ONS Housing Affordability Dataset, March 2017

2.2.15 However the Council still does not consider that this justifies an adjustment to the OAN, for a number of reasons (which are explained in further detail below):

- (a) It is appropriate to consider the affordability position in 2015 rather than 2016 or 2017, as this is the base date of the plan. Any deterioration post 2015 will be picked up in the planned level of development.
- (b) The PPG advises (2a-020) that consideration should be given to a comparative analysis of longer-term trends in the market signals noting that indicators can be volatile.

2.2.16 House price trends and the affordability ratio locally are influenced by macro-economic factors nationally and market trends at a wider national and regional level. Therefore before considering these two points further it is necessary to understand what lies behind the deterioration identified in the question.

#### Understanding Short-Term Trends

2.2.17 The deterioration in the affordability ratio between 2014-17 has been driven by an upturn in market demand influenced by economic stability and growth, improving availability of mortgage finance, and Government initiatives to support the housing market such as Help-to-Buy. This has driven an increase in housing demand. This has been borne out in a recovery in sales of market housing since 2013, as the chart below indicates. This shows a close correlation of sales trends at a local, regional and national level highlighting the influence of macro-economic factors.

---

<sup>12</sup> As referred to in the Inspector's Initial Question. The Council notes the Inspector's preference for this over the residence-based ratio as indicated in Footnote 2 in the Waverley Borough Inspector's Report, Feb 2018.

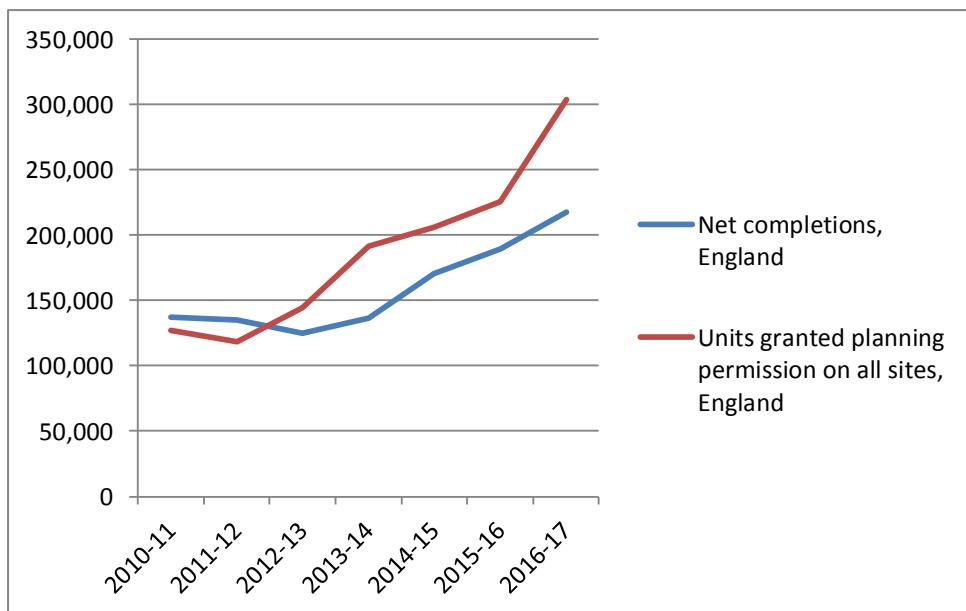
**Figure 2.11 – Indexed Trend in Sales of Market Housing**



Source: Based on HM Land Registry Sales Data

- 2.2.18 In contrast, housing supply has been relatively inelastic. Firstly it typically takes time for new-build housing supply to respond to an upturn in market demand, as the analysis of the lag between planning permissions and completions nationally shows (see Figure 2.12 below). Arising from the upturn in demand from 2013, planning applications and permissions increased; but there is around a two year time-lag before housing delivery responds. This helps explain why the PPG in 2a-020 emphasises consideration of longer-term trends in the market signals, and why over-reliance should not be placed on trends over a small number of years.

**Figure 2.12 – Trends in Permissions Granted and Dwelling Completions, England**



Source: CLG Housing Statistics (Table 120)

2.2.19 Secondly, in Guildford's context, an important constraint on housing supply has been Green Belt. 89% of the Borough's land area falls within Green Belt, and national policy is clear that Green Belt boundaries should be reviewed through the Local Plan process. Almost 50% of the plan's housing provision is on land currently designated Green Belt. Housing delivery in recent years and prior to the adoption of the plan has been influenced by the Green Belt, and this has constrained the ability of supply to respond to the upturn in market demand. National planning policy has constrained supply responsiveness.

#### The Base Date of the Plan

2.2.20 Next, for the purposes of considering the affordability data above, the Council considers that it is important to remember that the base date of the OAN (and the housing requirement in the plan) is 2015.

2.2.21 In considering the deterioration in the affordability ratios between 2015-16/17 (and how to respond to this), it is necessary therefore to also consider housing supply in this period. Net dwelling completions 2015-16 in the Borough were 387 dwellings, falling over 41% below the OAN of 654 dpa. There was further under-delivery in 2016/17 (294 dwellings or 55% below OAN). In the context of this under-delivery in 2015-17, it is quite understandable that affordability has deteriorated.

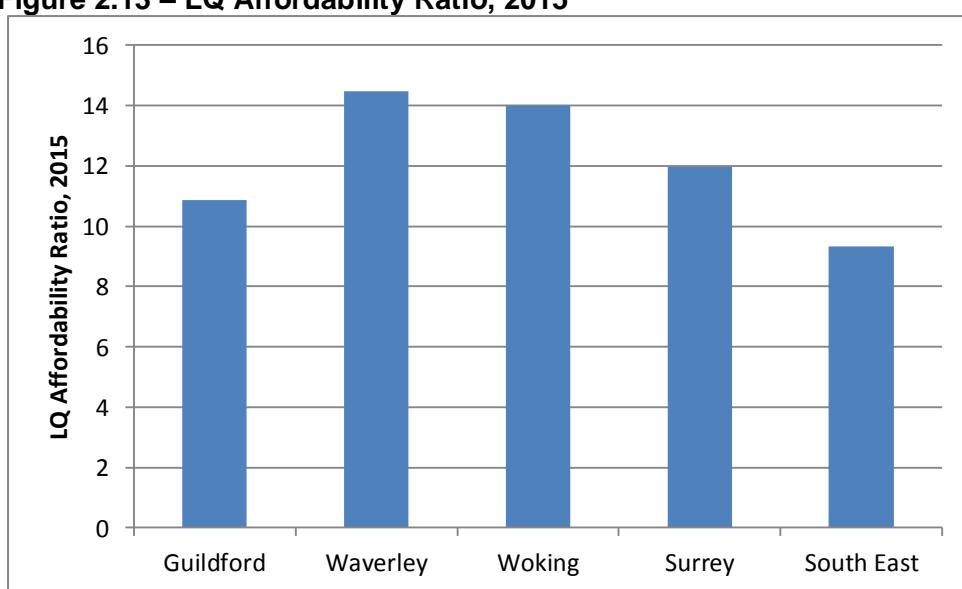
2.2.22 The solution however is to increase housing delivery looking forwards (as the submitted plan will do), not to adjust the requirement. The under-delivery in the early years of the plan period is made up later on, as the housing trajectory shows. The Council consider that to adjust the OAN as well, to take account of the deterioration in affordability since the plan's 2015 base date, would be to introduce double

counting. Getting the Local Plan in place as quickly as possible is the appropriate solution to boosting housing supply.

#### The Affordability Ratio in 2015

- 2.2.23 The Council recognises that a (workplace-based) LQ affordability ratio of 10.9 in 2015 is significant. It is above the SE average of 9.3, albeit below that in Waverley (14.5), Woking (14.0) and across Surrey (12.0). The England average is 7.1.
- 2.2.24 This means that Guildford on this measure is more affordable than the other two areas within the HMA; and indeed Surrey as a whole. This is a relevant consideration in the scale of adjustment which is appropriate, including relative to other authorities within the HMA.

**Figure 2.13 – LQ Affordability Ratio, 2015**

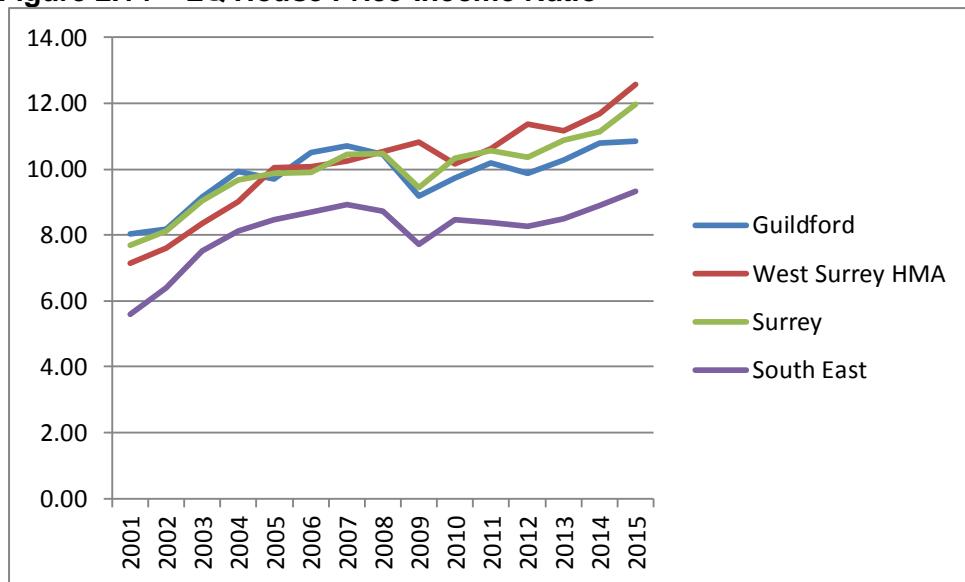


Source: ONS Housing Affordability Dataset, March 2017

#### Considering Longer-Term Trends

- 2.2.25 The Council also recognises that there has been a relative deterioration in the affordability ratio in the longer-term, but seen in context, much of this was prior to 2004 influenced by the rapid growth in prices which was supported by mortgage availability and macro-economic conditions at that point. The LQ ratio in Guildford was 9.9 in 2004.

**Figure 2.14 – LQ House Price-Income Ratio**



Source: ONS Housing Affordability Dataset, March 2017

- 2.2.26 The evidence indicates that the affordability ratio has worsened, but to a lesser degree than has been seen across other parts of the HMA and Surrey; and indeed across the region over the longer-term. Following the approach in the PPG (2a-020), this is a relevant consideration in drawing conclusions on the appropriate response to market signals.

**Table 2.8 – Change in LQ Affordability Ratio**

	5 Yr	10 Yr	15 Yr
<b>Guildford</b>	1.12	1.17	3.61
<b>West Surrey HMA</b>	2.40	2.51	6.36
<b>Surrey</b>	1.62	2.09	4.76
<b>South East</b>	0.89	0.89	4.28
<b>England</b>	0.25	0.29	3.26

Source: ONS Housing Affordability Dataset, March 2017

### (c) Affordable Housing

- 2.2.27 The Council recognise that there is a significant level of affordable housing need in the Borough, with the SHMA Addendum pointing to an annual need from 517 households. Whilst the SHMA Addendum identified that notionally over 1200 homes pa would be required to meet the affordable housing need in full, assuming 40% affordable housing delivery, this figure needs to be treated with extreme caution as the Addendum set out (SD-003 Para 2.42).
- 2.2.28 The affordable needs calculation includes supply-side factors, and considers not just newly-arising need but existing households, who if they moved would release a property for another household. It is only concealed and homeless households who

would need additional housing overall. The scale of upward adjustments in the OAN calculation more than address these needs.<sup>13</sup>

- 2.2.29 It is also important to recognise that market housing costs (an in particular private sector rents) are an input to the assessment of affordable housing need; and that an improvement in market housing affordability (particularly for rent) would reduce the scale of affordable housing need.<sup>14</sup>
- 2.2.30 The very significant increase in housing provision relative to historical delivery which the plan envisages will contribute strongly to an increase in the delivery of affordable housing.

#### **(d) Considering the Uplift to Improve Affordability**

- 2.2.31 GL Hearn is aware and has reviewed a number of reports which have used econometric modelling to examine the interaction between levels of housing supply and affordability. These include the 2004 Barker Review; a 2007 Report by the NHPAU on *Developing a Target Range for the Supply of New Homes across England*; the University of Reading's Affordability Model which has been used by the Office for Budget Responsibility (OBR)<sup>15</sup>; the 2016 Redfurn Review; and 2017 House of Lords Select Committee on Economic Affairs report on *Building more homes*.
- 2.2.32 These studies/reports have principally drawn on econometric modelling which considers the interaction between factors affecting prices at a national level. The affordability model identifies the complexities of influences on prices and affordability – including earnings growth, interest rates and indeed market expectations.
- 2.2.33 The models which exist do not answer the question of what level of supply (or increase of supply relative to household projections) would be appropriate at a local authority level, or would improve affordability within Guildford Borough specifically. The models are not designed to, and are not appropriate for doing this. In investigating the link between house prices and supply, they hold other factors constant – such as migration, the proportion of working age population to housing stock, and earnings – when in reality at a local level, these are all fluid.
- 2.2.34 Furthermore what a number of the studies have clearly set out is that market perceptions are important, and that changing perceptions/expectations on house price growth could well influence house prices themselves.

#### **The Influence of Macro-Economic Factors on Price Trends Locally**

---

<sup>13</sup> 237 concealed and homeless households. This is derived from the detailed modelling which informed Table 24 in the Addendum SD-003.

<sup>14</sup> The evidence shows that whilst lower quartile house prices have grown by 6.8% pa between 2011-16, lower quartile rents in the Borough have grown much more slowly by 2.5% pa. Using the affordable housing needs modelling to undertake a sensitivity analysis, a reduction in LQ rents by 10% would reduce the affordable housing need by 15% from 517 dpa to 439 dpa.

<sup>15</sup> OBR Working Paper No6: Forecasting House Prices, 2014.

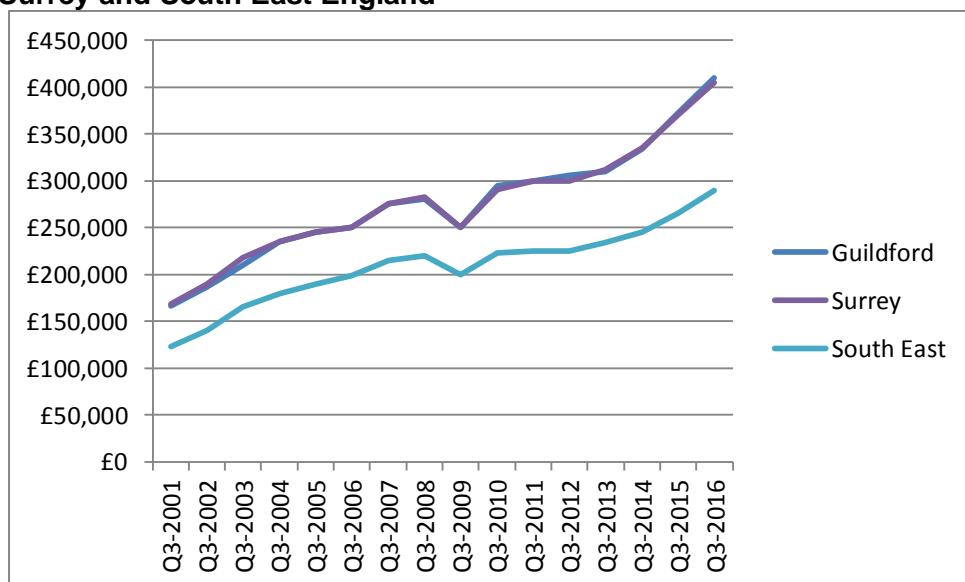
2.2.35 Whilst housing supply within the Borough will influence trends in house prices and affordability, it is important to recognise that these are also influenced by macro-economic trends and regional supply/demand dynamics.

2.2.36 Trends in median house prices show a strong correlation to those across Surrey as a whole – indeed they almost precisely match (see Figure 2.15 below). There is a close correlation to price trends across the South East more widely.

2.2.37 The graph below shows an upward trend in prices, but also the cyclical nature of the market, with stronger relative growth in the early 2000s supported by macro-economic stability and growth in the availability of mortgage finance; the impact of a rise in interest rates in 2005; of the credit crunch in 2009; of weaker macro-economic conditions between 2010-12; and the subsequent recent upturn in demand influenced by macro-economic stability, increasing lending, and Government/monetary stimulus to the market.

2.2.38 Against this context, increasing housing supply and delivery needs to happen across wider geographies – indeed across the region – to achieve an improvement in affordability.

**Figure 2.15 – Correlation between Median House Price Trends in Guildford, Surrey and South East England<sup>16</sup>**



*Source: Based on HM Land Registry Data*

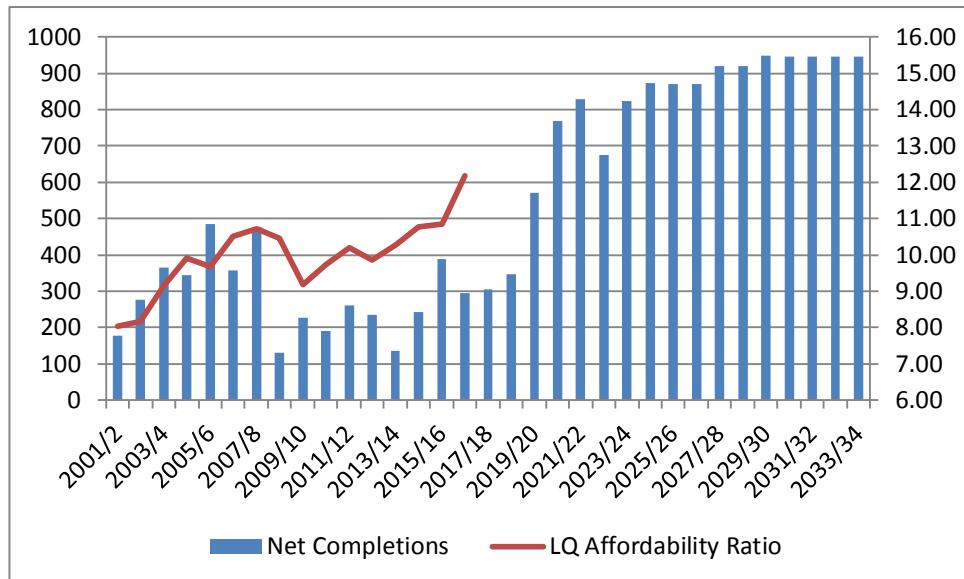
2.2.39 Whilst increasing housing supply in Guildford Borough will contribute to improving affordability in the longer-term, models which seek to isolate the precise impact which an increase in housing supply will have on improving affordability in the Borough fail to recognise evidence clearly showing that it is at a broader (likely regional) scale at which the supply-price relationship works. A sustained increase in housing supply across the region as a whole is needed.

<sup>16</sup> This shows actual price trends rather than price growth in real terms.

## Improving Affordability in Guildford

2.2.40 It is in this context in which it is appropriate to return to look at Guildford. Historically average net completions 2001-17 have averaged 287 dpa. The chart below shows the trajectory assumed in the Local Plan.

**Figure 2.16 – Housing Trajectory relative to Historical Delivery in Guildford Borough**



2.2.41 The submitted Plan envisages net completions averaging 877 dpa from 2020 onwards. This represents a **tripling** in rates of housing delivery in the Borough. Considered over the plan period a whole (2015-34), the level of housing delivery which is 2.7 times that delivered historically.

2.2.42 It is not possible to be precise as to the impact which this will have on house prices in the Borough, however the Council considers that this tripling of housing delivery rates will significantly impact on market expectations and perceptions of house price growth at the local level, which will over time improve market housing affordability in the Borough. As both the Barker and Redfurn Reviews recognise, changing perceptions/expectations on house price growth can influence house prices themselves.

2.2.43 In line with Para 2a-020 in the PPG, the Council considers that the increase in supply implied in the OAN and plan requirement can on reasonable assumptions be expected to improve affordability over the plan period; and it will monitor the response of the market over time. The required five yearly reviews of plans (as is likely to be required by Government) provide the appropriate mechanism to do so.

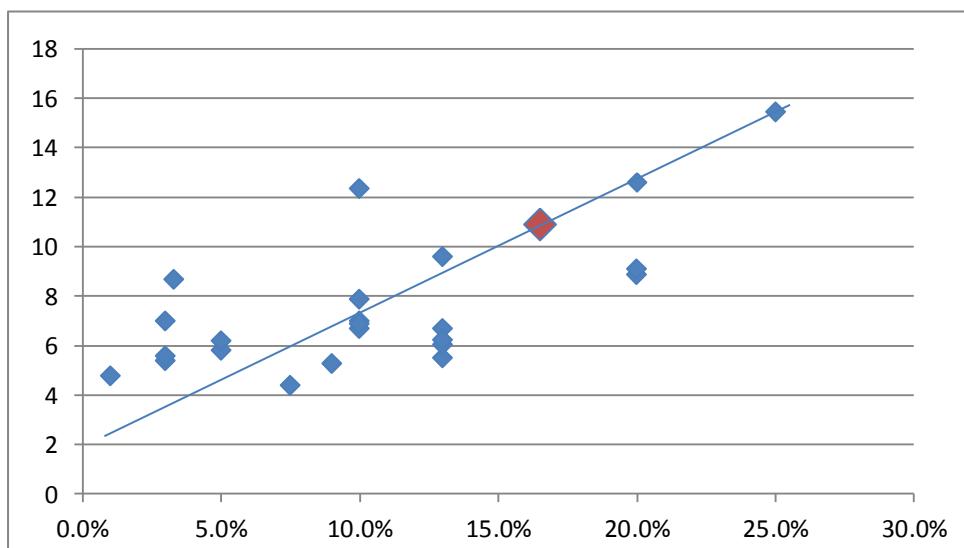
### **Considering Adjustments made Elsewhere**

2.2.44 The basis of the calculation of the 17% adjustment made in drawing conclusions on Guildford's OAN within the SHMA Addendum is set out above.

2.2.45 However to inform this response, the Council has also sought to benchmark this against market signals adjustments which have been made or tested through local plan examinations since 2015 in plans which have been found sound or adopted.<sup>17</sup>

2.2.46 Figure 2.17 plots the findings regarding the appropriate market signals adjustment against the relevant LQ income ratio considered. A trend-line has then been plotted. In a number of areas a no specific market signals adjustment has been applied, and these have been excluded.

**Figure 2.17 – Benchmarking Affordability in Guildford against Market Signals Adjustments Elsewhere**



2.2.47 On the basis of an LQ affordability ratio in Guildford of 10.9 in 2015, this benchmarking exercise indicates that a 16.5% market signals adjustment is appropriate. Although derived from an alternative approach, this reinforces the appropriateness of the SHMA Addendum's findings.

<sup>17</sup> Adur, Brighton & Hove, Bromsgrove, Canterbury, Corby, Cornwall, Coventry, Derby, East Northamptonshire, High Peak, Kettering, Lincoln, Luton, Mid Sussex, North Kesteven, North Tyneside, NW Leicestershire, South Derbyshire, Stevenage, Tamworth, Waverley, Wellingborough, West Lindsey.

### **Question 3 - Unmet Need in the Housing Market Area (HMA)**

***Is the plan sound in not making any allowance for unmet need arising elsewhere in the HMA? Relevant aspects include:***

- 3.1    *The allowance of 83 dpa already contained within the Waverley Local Plan.***
  - 3.2    *The constraints imposed by Green Belt and other designations, and the fact that it appears necessary for the plan to release substantial sites from the Green Belt in order to meet its own identified OAN.***
  - 3.3    *Any other unmet need issues.***
- 3    The Council's response to this question is still that set out in the Council's response to *Question 2: Unmet housing need in the housing market area* of the Inspector's Initial Questions. The justification for the Council's position that it cannot meet any unmet need can be summarised as follows:
- The Council considers that if Woking's unmet need is to be met, it should be within the time period identified in its local plan in it, i.e. before 2026/27, and not after.
  - Guildford is not able to sustainably meet any additional growth in the period relevant to Woking's need. If Guildford were able to then such development would be required to boost Guildford's own early delivery.
  - In particular, the Council do not consider it reasonable, or consistent with achieving sustainable development, to require Guildford to release further Green Belt sites - which is what would be required if a contribution to Woking's unmet need were to be made - without a consideration of locating development in Woking's own Green Belt.
  - Furthermore, the Council considers that Woking's unmet need is lower than previously assessed.
  - Woking is required to review its Core Strategy as it is over 5 years old. This will present the opportunity to meet their OAN.

As set out in the Council's response to *Question 2* of the Inspector's Matters and Issues, the ONS is due to release new 2016-based Sub-National Population Projections on 24 May 2018. The Council will update the examination on the implications of these at the Hearings. Whilst this has the potential to impact on the scale of the residual unmet need, the Council maintains its position that at present there is considerable doubt as to its extent.

## **Question 4 - Housing Trajectory**

***Is the plan's housing trajectory, which starts at a low level and rises towards the later years of the Plan period, a sound basis for meeting housing need?***

- 4 The Council's response to this question should be read alongside the detailed response provided to *Question 3: The housing trajectory* of the Inspector's Initial Questions. The justification for the Council's rate of delivery in the housing trajectory is as follows:
- The spatial hierarchy sought to identify the most sustainable locations for development with a brownfield first policy. It has been rigorously applied to all spatial options to ensure development needs are met in a sustainable way.
  - When Guildford's OAN reduced in the Regulation 19 Local Plan (2017), consideration was explicitly given to see if the additional supply could meet unmet need elsewhere in the Housing Market Area (HMA). However, the sites were removed for legitimate site-specific reasons which mean they are no longer considered suitable for housing development.
  - The proposed housing trajectory is considered to be realistic and deliverable. Whilst the large sites in the plan all help contribute towards early delivery, they have long buildout periods and infrastructure issues that need to be addressed to facilitate development. However, the Council has taken positive steps to maximising early delivery such as allocating numerous small Green Belt sites that can all deliver early.
  - Guildford Borough Council has submitted a plan that seeks to meet housing need but for justifiable reasons this will need to be back loaded to a degree.

### **4.1 *The ability or otherwise of increasing the rate of delivery in the early years.***

- 4.1.1 The Council has actively sought to maximise early delivery through the preparation of its spatial strategy and considers that the Submission Local Plan delivers a significant step change in housing delivery. The proposed strategy will significantly boost the supply of housing to help meet the identified housing need whilst actively seeking to address past underperformance. As set out above the cumulative impact of all of these factors means the housing requirement necessary to deliver a Sedgefield approach (namely an annualised housing requirement with the backlog met in the first five years plus a 20% buffer for choice and competition in the market) is considered unrealistic.
- 4.1.2 Early delivery in the plan has been maximised through the allocation of the six smaller Green Belt sites (totalling almost 1,000 homes) which are all able to come forward quickly given their scale and the fact they are not dependent upon the delivery of essential infrastructure. Barring one small urban extension, the remaining sites are all at the bottom of the spatial hierarchy (extensions to villages). It is worth noting that an important part of the "exceptional circumstances" justification for these sites does not simply relate to their contribution to the overall housing requirement but that they are necessary for early delivery as they are all projected to be completed within the first five years.

- 4.1.3 The allocation of the three strategic Green Belt sites also helps to contribute towards early delivery (a total of 450 homes in the first five years). Furthermore, the plan is proposing to inset 14 villages from the Green Belt. Whilst the housing trajectory includes all suitable sites within this spatial location that are currently known to be available (almost 300 homes), there is potential for further supply to come forward as future windfall. This could further help to contribute towards delivery, including potentially early delivery.
- 4.1.4 There are a variety of possible ways in which early delivery could be improved. These will be discussed below in turn.

#### Allocation of additional sites

- 4.1.5 The Council considers that the proposed strategy represents a sustainable and deliverable plan. As part of the site selection process, the Council explored each spatial location and sought to maximise sustainable opportunities for growth within each up to the point at which it is considered that the harm of allocating more homes would significantly and demonstrably outweigh the benefits. At this point the Council explored the extent to which sites could be identified in the next spatial location and so on.
- 4.1.6 For a more detailed explanation regarding the site selection process, the Housing Delivery topic paper explores each spatial location and justifies the sites proposed to be allocated in the Submission Local Plan, as well as explaining why certain sites are considered inappropriate for allocation and/or considered appropriate for testing through the Sustainability Appraisal process (paragraphs 4.64 to 4.181).

#### Rate of delivery

- 4.1.7 A further way to increase early delivery would be to increase the rate of delivery on the sites allocated in the plan. This is discussed in more detail below in the response to *Question 4.2* regarding the housing trajectory. The Council considers that the rate of delivery projected is realistic and deliverable. The plan does not seek to impose a cap on the delivery of site allocations. Instead, it makes reasonable estimates on the lead in time required for sites to gain permission, the timing of infrastructure improvements which may influence delivery and the rate at which sites would be completed. As these sites move through the planning application process and through to construction, the Council would be supportive of any measures that could serve to speed up any of these factors however it does not consider that it would be a robust position to be reliant upon this at this stage given the uncertainties related to this.

#### Capacity of site allocations

- 4.1.8 A further way of increasing early delivery would be to assess again the capacity of the allocations to evaluate whether the most efficient use of land is being made. The capacity on some sites has been increased through various iterations of the plan in response to representations received or the availability of new evidence. All allocations are “approximate” numbers which acknowledges that more detailed

design work and the planning application process may yield a slightly different number. The plan enables this eventually to occur in both an upward and downward direction.

- 4.1.9 The plan has sought to be cautious in its allocation assumptions acknowledging that it does not present a cap on the level of development and enables greater flexibility in supply should the planning application process identify a higher figure as being appropriate. The draft NPPF places greater emphasis on the efficient use of land and the density of new development. The current timetable for publishing the NPPF is Summer 2018 and so this policy is likely to be in force when the majority of these planning applications are submitted. The Council therefore considers that there is sufficient policy direction to ensure that sites are maximised to deliver sustainable development. As a general principle, the Council considers this to be a robust approach as it reduces the risk of relying on a capacity that may prove unachievable.

#### Balance of land uses on sites

- 4.1.10 A further way of potentially increasing delivery in the early years would be to amend the balance of land uses on certain sites. This could be achieved through either amending the allocation quantum or use on certain sites or reconsidering the extent to which the plan should protect other uses from being lost to residential. This response should be read alongside the Council's response to *Question 5: The balance of land uses*, *Question 6: North Street* (see GBC-LPSS-001) and *Question 30: The leisure and visitor experience* of the Inspector's initial Questions (see GBC-LPSS-002) and the Council's response to *Question 7.2* and *Question 8* of the Inspector's Matters and Issues. In summary, the Council considers it is important to direct high trip generating uses towards town centres in accordance with the NPPF. These sites can nevertheless be maximised through the delivery of mixed use developments which the Council has sought to do on a number of the larger sites such as A6: North Street and A7: Guildford Station.

- 4.1.11 The Council considers its approach to protecting existing uses is appropriate and reasonable. To not do so would risk these lower land value uses being lost to residential. This would impact upon the Council's ability to meet identified needs for these uses given the lack of sufficient alternative sites. It would also negatively impact upon the local economy, including rural and visitor economy, and the vitality and vibrancy of the town centre.

#### Windfall sites

- 4.1.12 Since the submission of the Local Plan in December 2017, there have been two notable appeal decisions. The first relates to a site proposed to be allocated within the Submission Local Plan (A7: Land and buildings at Guildford railway station). The allocation is for 350 homes however the appeal scheme which has been allowed is for 438 homes (an increase of 88 homes). The phasing evidence submitted as part of the appeal stated that all dwellings are expected to be completed by 2023/24 (the end of the first five years of the plan post adoption).

- 4.1.13 The second appeal is a site that is not included in the Submission Local Plan at Effingham. The scheme includes 295 homes and a replacement Howard of Effingham secondary school. Both these sites will contribute towards additional early delivery and this is reflected in the Council's revised Housing Trajectory which has been prepared as part of the Council's response to *Question 5: Five year housing land supply*.
- 4.1.14 The Council considers that future large windfall sites are unlikely to be significant once the new plan is adopted, particularly in the early years. Given the constraints that will remain on land not allocated in the plan, it would therefore not be appropriate to include a large site windfall allowance. The Council has published a Regeneration Strategy 2017, which forms the basis for the work programme by the Council's Major Projects team. This team is seeking to bring forward some sites within the town centre. At this stage however they have not progressed far enough for any of these sites to be included as site allocations in the plan. They can nevertheless come forward in the future as either windfall sites or through subsequent Local Plan reviews. Given the complexities of bringing these sites forward, including land assembly and leases, these are considered to be longer term development opportunities and are likely to be delivered well into the plan period, or potentially beyond.
- 4.1.15 As part of updating the Housing Trajectory, the Council has also reconsidered whether the previous estimated phasing of sites remains appropriate or needed amending following new evidence. Once such site is Site A1: The Plaza (90 homes) which was previously counted in years 1-5 and was recently granted planning permission. However, the Council has been informed that the owners of this site are no longer intending to implement the consented scheme and the land is now for sale. Given this uncertainty, the site is now projected to be delivered in years 6-10.

- 4.1.16 The Trajectory also includes a small site windfall allowance<sup>18</sup> however this is discounted in the early years to avoid double counting with sites that already have planning permission. The allowance is based on evidence related to past delivery and it would not be considered robust to increase it.

## **4.2    *Whether the housing trajectory is realistic and deliverable, and whether there are any identifiable threats to delivery.***

### The housing trajectory

- 4.2.1 As set out in the Council's response to Question 2 of the Inspector's Matters and Issues, the OAN for Guildford is now assessed to be 625 – 632 homes (from 654). The reason for the drop is as a result of a revised demographic starting point linked to the latest mid-year population estimates. Two housing trajectories have been prepared (for 632 and 654) and these are contained in the appendices to this question.

---

<sup>18</sup> This is consistent with NPPF paragraph 48. An explanation of how the windfall allowance has been calculated is in appendix D of the Land Availability Assessment (LAA) 2017.

- 4.2.2 The housing trajectory data has been updated to reflect the latest monitoring information to 31 March 2018. An explanation of the expected phasing within the housing trajectory, that was included in the Council's response to *Question 3: The housing trajectory* of the Inspector's Initial Questions, has been updated to explain where there have been changes.
- 4.2.3 The revised Housing Trajectory is included in Appendix 1 (OAN of 654) and Appendix 3 (OAN of 632) of this Question. It sets out the different sources of supply/sites and their expected phasing across the plan period. The delivery of sites is projected to be as follows:
- Sites with permission are projected to be delivered within five years unless there is clear evidence that homes will not be delivered within this period<sup>19</sup>
    - The outstanding permissions at Ash and Tongham, and the two recent appeals (Howard of Effingham and Guildford Station) are shown separately to help understand their contribution in the next five years as delivery on these sites is expected to extend beyond five years
  - A small site windfall allowance has been included across the plan period however this is discounted by 50% in the early years to avoid double counting with sites that already have planning permission<sup>20</sup>
  - A small trend based allowance for Rural Exception Sites has been included across the whole plan period (6pa)
  - Guildford town centre sites are projected to deliver during the mid to late plan period due to the complexities of delivering brownfield sites and their availability for redevelopment.
    - 1-5: There are no longer any sites due to Site A1: Plaza is no longer considered to be available, this site has been moved to 6-10.
    - 6-10: The expected delivery is lower than previously as a result of Site A7: Guildford Station now having permission.
  - Guildford urban area sites (excluding Slyfield Area Regeneration Project) are projected to be delivered at a fairly consistent rate across the plan period but, given the existing predominantly residential nature of the built up area, the contribution is fairly limited
  - Slyfield Area Regeneration Project (SARP) is a brownfield site that requires the relocation of a sewage treatment works and is projected to be delivered towards the end of the plan period (a further 500 homes are projected post the plan period)
  - Ash and Tongham urban area development opportunities are very limited given its smaller scale and the existing predominantly residential nature of the built up area. These sites are projected to deliver during the mid to late plan period
  - Ash and Tongham urban extension on CBGB is projected to be delivered at a relatively constant rate during the plan period in light of the large number of existing planning permissions (approximately 700 homes) that are projected to be completed over the next few years once SANG is available (Grampian condition

---

<sup>19</sup> This is consistent with NPPF paragraph 47, footnote 11. This includes 04/P/00576 (The Old Tannery Works, Send).

<sup>20</sup> This is consistent with NPPF paragraph 48. An explanation of how the windfall allowance has been calculated is in appendix D of the Land Availability Assessment (LAA).

referred to above). Overall development at this location is projected to be delivered at this rate given the smaller nature of the urban area and its capacity to absorb new development. For this reason, it is not considered to be realistic to project that more homes will be delivered early in addition to the existing sites with planning permission awaiting delivery of SANG.

- Sites within identified and inset villages are predominantly projected to be delivered early in the plan period unless there are availability issues
- Previously developed sites are projected to be delivered early to mid plan period based on the expected availability of the sites given their current uses
- New settlement at former Wisley airfield is projected to make a modest contribution in the first five years of the plan with delivery stepping up in the mid to late plan period. The majority of the site allocation is subject to a planning appeal, with a decision expected within the next few months following the conclusion of the inquiry last autumn. At the inquiry, Highways England, in closing, confirmed their objection to the Strategic Road Network (SRN) transport mitigation based on various concerns. We understand that this objection remains, albeit a number of their concerns have been addressed and the appellant and Highways England are continuing to work together to further advise the Secretary of State. If the appeal is allowed, then this site could potentially deliver additional homes in the early years to that assumed in the trajectory.
- Blackwell Farm and Gosden Hill Farm (two strategic Guildford urban extensions) are projected to make a modest contribution in the first five years, consistent with the current projections for Wisley airfield. In contrast to the former Wisley airfield these sites are projected to deliver at a slower rate in the mid plan period, and will then increase towards the end of the plan period. As sites closely situated to, and potentially adversely impacting, the Guildford section of the A3, delivery reflects the timing of appropriate schemes to limit their impact on the SRN in advance of the A3 Guildford Road Investment Strategy (RIS) scheme, or other appropriate transport mitigation, which is expected to be completed in 2027. This is discussed in more detail below.
- A number of smaller Green Belt sites (one small Guildford urban extension and a number of extensions to villages) are all projected to be delivered in the first five years.

4.2.4 The Council considers the housing trajectory to be realistic and deliverable. It takes a prudent view on the delivery that will be able to reasonably come forward during years 6-10 of the plan. In particular, the Council believes that it remains a reasonable position to project that Gosden Hill Farm and Blackwell Farm will not be able to deliver as many homes as quickly as the former Wisley airfield.

4.2.5 The Council, working with partners Surrey County Council, accepts the potential benefits of the provision of the park and ride facility at Gosden Hill Farm in that it will allow new vehicular trips generated by the development to use the 'headroom' on the highway networks provided by the interception of existing trips by the park and ride facility. In addition, it is anticipated that the headroom created on the A3100 will assist with the provision of the eastern route section of the Sustainable Movement

Corridor that is proposed in the Infrastructure Delivery Plan and set out as Requirement 4 in Policy A25.

- 4.2.6 The Council acknowledges that there are transport mitigation measures for both sites that could be accelerated. Such a strategy could, in theory, release additional ‘headroom’ on the highway networks for new vehicular trips generated by the sites and enable additional development to come forward during the period between 2024 and 2027, which is the period during which, at the earliest, Highways England will be constructing their A3 Guildford RIS scheme. In spite of this, given the complexity of delivering this scheme and the likely impact that construction will have on the already constrained capacity of the A3, the Council do not consider it realistic that both sites would be able to deliver at the pace they would otherwise.
- 4.2.7 Based on our discussions to date with the site promoters for Blackwell Farm and Gosden Hill Farm, we are not sufficiently confident that they would be minded to invest additional developer monies in funding the acceleration of identified or new transport schemes to facilitate additional early delivery, when the prospect of a Government-funded A3 Guildford RIS scheme is forthcoming.
- 4.2.8 In addition, given the risks of delay and/or significant degradation in the form of the A3 Guildford RIS scheme (discussed in the sub-section below), and the complexity of delivering an A3 Guildford RIS scheme, Highways England may seek to impose Grampian conditions to prevent or limit accelerated delivery at Blackwell Farm or Gosden Hill Farm during the period of the scheme’s construction. This view is reinforced by the submissions made by Highways England at the Wisley Airfield planning appeal last year, which is still awaiting a decision.
- 4.2.9 The housing trajectory is therefore a prudent projection that considers the wider context and the cumulative scale of development. As set out above it does not represent a cap on development however provides a realistic basis upon which to ensure that the plan is able to deliver a rolling five year land supply from the date of adoption. More detail on the five year housing land supply position is included in the Council’s response to *Question 5* of the Inspector’s Matters and Issues. This demonstrates that a Liverpool Phased approach is necessary to deliver a resilient plan that is flexible enough to adapt to changing circumstances.

#### Identifiable threats to delivery: the A3 Guildford RIS scheme

- 4.2.10 As described in the Transport topic paper (2017), the delivery of planned development had been proposed to ensure that the sites, and phasing of sites, that will be delivered in the first years of the new Local Plan, and therefore in the absence of the Department for Transport’s Road Investment Strategy (RIS) Road Period 1 and/or Road Period 2 schemes are located where traffic associated with them will have the least impact on the SRN’s links and junctions where current safety and congestion issues are the most acute. (The title of the RIS is the Road Investment Strategy: for the 2015/16 – 2019/20 Road Period (Department for Transport, March 2015).) This is discussed more fully in the response under 4.3.

- 4.2.11 For delivery later in the plan period, the implementation of the three RIS schemes, alongside other critical infrastructure, is required in order to be able to accommodate future planned growth both outside and within the borough.
- 4.2.12 The Strategic Highway Assessment Report: Guildford Borough Proposed Submission Local Plan “June 2016” (Surrey County Council, June 2016) (hereafter the SHAR 2016) is a technical report on the strategic highway assessment of the spatial strategy in the Regulation 19 Local Plan (2016). The SHAR 2016 states in conclusion:
- ‘The results show that for Scenario 5, which represents the quantum and distribution of development proposed in the Proposed Submission Local Plan together with the key highway schemes, there will not be a severe impact on the local and strategic highway network, when compared against the Do-Minimum Scenario 1.’ (paragraph 5.1.6).*
- 4.2.13 Conversely, the SHAR 2016 concludes as follows for the eventuality that the RIS schemes not be realised:
- ‘Nevertheless, the results of this assessment indicate that should the RIS schemes not be forthcoming then the residual cumulative impact of the Proposed Submission Local Plan on the highway network could be considered severe. This is evident from considering the results from a comparison of Scenario 2 with the Do-Minimum Scenario 1, and the intermediate Scenarios 3 and 4. To avoid this occurring in such circumstances of the RIS schemes not being forthcoming, then the quantum and location of development as proposed may have to be amended.’*
- 4.2.14 The addendum to the SHAR 2016 (Guildford Borough Council, 2017) is a high-level review which considers the potential changes to traffic impacts – from those reported in the SHAR 2016 – which are expected as a result of the key changes made to the proposed site allocations and to the programme of transport schemes as identified in the Draft Local Plan 2017. The addendum found that the key changes made to proposed site policies and to the programme of transport schemes in the Regulation 19 Local Plan (2017) are not considered likely to change the SHAR 2016’s conclusion.
- 4.2.15 Accordingly, Policy ID1 at points (4) and (5), as well other policies in the Submission Local Plan, require regard to be had to the dependencies between planned development and key infrastructure schemes.
- 4.2.16 Having identified that the implementation of the three RIS schemes is critical to delivery later in the plan period, the Council considers that there are risks of delay and/or significant degradation in the form of the A3 Guildford RIS scheme which represent an identifiable threat to the delivery of Local Plan development later in the plan period.

4.2.17 The risks of delay and/or significant degradation in the form of the A3 Guildford RIS scheme result from a combination of the following factors:

- Challenge of preparing an engineering design given present A3 Guildford alignment has sub-standard geometry and closely spaced junctions and is enveloped by built-up urban area of Guildford.
- Challenge of constructing a scheme given existing significant, recurrent traffic congestion is experienced during peak hours on the A3 trunk road through the urban area of Guildford, with queuing extending back onto the dual carriageway section of the eastbound A31.
- Challenges and delays with Highways England's portfolio of major enhancement projects originally scheduled to enter construction in Road Period 1, including the schemes to improve the M25 Junction 10/A3 Wisley interchange junction and realise an M25 Junctions 10-16 Smart Motorway scheme, could have a knock-on effect on the delivery of the A3 Guildford RIS scheme.
- Risk that Government does not include the A3 Guildford RIS scheme in the forthcoming RIS2 document (or second RIS).

4.2.18 The RIS identified the A3 Guildford RIS scheme as a 'Scheme developed for the next Road Period' in recognition that this is a scheme for which 'the design of the scheme is complex and needs to consider a number of potential options – a process which takes time to complete' (Department for Transport, 2015).

4.2.19 As of May 2018, Highways England's development of the A3 Guildford RIS scheme remains at stage 0 'Strategy, shaping and prioritisation' of their Project Control Framework (PCF). (See Figure 4.1 for graphic of the PCF.) The Council had previously been informed that PCF stage 0 was completed in November 2016 – now 18 months ago – and were then advised in a letter from the Department for Transport in May 2017 that this scheme would progress to PCF stage 1 ('Option identification') in summer 2017. In January 2018, the Council learnt that the scheme has continued in PCF stage 0 and, as stated above, this remains the case.



**Figure 4.1: Major Projects lifecycle stages of the Project Control Framework**

Source: Figure 2 in *The Project Control Framework: Quick reference guide* (Highways England, Version 1, February 2017) (Available at <http://assets.highways.gov.uk/roads/road-projects/A12+Chelmsford+to+A120/The+Project+Control+Framework+Quick+Reference+Guide+v1+February+2017.pdf>)

4.2.20 With respect to Government decision-taking on the forthcoming RIS2 document, Highways England advised the Council by letter on 10 May 2018 as follows:

*'We will continue to explore suitable options for improving the A3 at Guildford with the aim of securing a scheme within the RIS2 programme. Ultimately, the decision on the future of the A3 Guildford scheme sits with the Secretary of State for Transport but it will be important when making our recommendation that the identified solution has secured broad-based community support.'*

- 4.2.21 RIS2 is due to be published by the Department for Transport in 2019. In the event that the A3 Guildford RIS scheme is included in RIS2, this does not guarantee its future implementation, as those Road Period 1 RIS schemes identified in the RIS with a 'committed' status, are subject to the proviso that they will enter construction 'Provided that the necessary statutory approvals are granted and the scheme continues to demonstrate value for money...' (Department for Transport, 2015: p.30).
- 4.2.22 Policies in the Submission Local Plan manage the risks arising from the uncertainties regarding the delivery and timing of delivery of the key infrastructure on which the delivery of the Plan depends, including the A3 Guildford RIS scheme. In this regard, see Policies ID1, ID3 (point (8)) and the site Policies A24 (requirement (2)), A25 (requirement (9)), A26 (requirement (9))and A35 (requirement (5)). This could include consideration of traffic impacts during the construction phases of the RIS schemes.
- 4.2.23 However, the consequence of a delay and/or a significant degradation in the form of the A3 Guildford RIS scheme would, in the absence of alternative interventions capable of providing comparable mitigation, be likely to reduce the quantum of development that would be delivered during the later years of the plan period to 2034. Such outcomes would, of course, be inconsistent with Government policy which is seeking to increase house building, particularly in the south east of England, and stimulate the local economy.

#### **4.3 *The key infrastructure improvements influencing the housing trajectory.***

- 4.3.1 The response to this question needs to be read alongside the justification for the rates of delivery in the trajectory set out above and a number of the site specific responses in Question 11<sup>21</sup> of the Inspector's Matters and Issues.

##### Transport planning considerations in the identification of housing trajectory for the early years of the plan

- 4.3.2 In preparing a new Local Plan for the borough, the Council, as the LPA is required to allocate sites for development (National Planning Policy Framework, 2012: paragraph 157) and to assess the quality and capacity of infrastructure for transport and its ability to meet forecasts (National Planning Policy Framework, 2012: paragraph 162). The Submission Local Plan's spatial strategy and key infrastructure schemes, as included in the Infrastructure Schedule, have been planned together and are interdependent in various ways. In short, the spatial strategy as proposed is dependent on the key infrastructure schemes as proposed.

---

<sup>21</sup> In particular Questions 11.7, 11.8, 11.12, 11.28, 11.30

- 4.3.3 Significant, recurrent traffic congestion is experienced during peak hours on the A3 trunk road through the urban area of Guildford, with queuing extending back onto the dual carriageway section of the eastbound A31, and to the east between the Ripley junction and the A3/M25 (Junction 10) Wisley interchange junction.
- 4.3.4 In the early years of the new Local Plan, the delivery of planned development and the impact of new development traffic on the Strategic Road Network (SRN) will be an important ongoing consideration as the existing SRN suffers from identified road safety issues with also significant congestion during peak periods. Highways England's primary concern is road safety and any proposal that adds significant levels of traffic to existing congested areas will need to be carefully assessed through the development management process for planning applications to ensure that it does not have a severe impact on road safety.
- 4.3.5 The Government's Road Investment Strategy: for the 2015/16 – 2019/20 Road Period (Department for Transport, March 2015) (hereafter the RIS) mandated Highways England to bring forward schemes to improve the M25 Junction 10/A3 Wisley interchange junction and realise an M25 Junctions 10-16 Smart Motorway scheme, both to enter construction in Road Period 1, and to develop proposals to allow the A3 trunk road through the Guildford urban area to be transformed from Road Period 2. These are schemes SRN3, SRN5 and SRN2 in the Infrastructure Schedule of the Submission Local Plan.
- 4.3.6 The RIS schemes are complicated. They involve land acquisition and securing development consent. As a result, Highways England is being cautious about programming these schemes. The RIS Road Period 1 schemes have funding budgeted for and, following a change to Highways England's programme, are now scheduled to be delivered from 2020/21. The RIS provides funding for developing the A3 Guildford RIS scheme during Road Period 1 up to 2019/20 with delivery of this scheme anticipated to start in the next Road Period, namely Road Period 2 which covers the period between 2020/21 and 2024/25. At the time of submission, the advice of Highways England was that, if a scheme is approved with funding agreed, construction is unlikely to start until 2024 at the earliest, with construction taking 2½ years to completion in 2027.
- 4.3.7 With this in mind, the delivery of planned development had been proposed to ensure that the sites, and phasing of sites, that will be delivered in the first years of the new Local Plan, and therefore in the absence of the Department for Transport's RIS Road Period 1 and/or Road Period 2 schemes are located where traffic associated with them will have the least impact on the SRN's links and junctions where current safety and congestion issues are the most acute.
- 4.3.8 For example, sites in the north of Guildford borough could be delivered earlier as the main constraints on the SRN that presently cause safety and congestion issues are proposed to be improved by the RIS Road Period 1 schemes at M25 Junction 10/A3 Wisley interchange improvement and the M25 Junctions 10-16 scheme. In addition, sites to the west of Guildford borough are likely to have a different distribution of trips that would be more focused towards the Blackwater Valley. As a result, residents and

businesses will have alternative ways of accessing the SRN via the A331 and M3 motorway, which was converted to a Smart Motorway with completion in 2017.

- 4.3.9 During these early years, targeted ‘traffic hotspot’ improvement schemes at the University and Stoke interchanges on the A3 Guildford will be delivered – as announced by Government in March 2017 – in combination with Submission Local Plan-realised improvements on the adjacent Local Road Network. In combination, these SRN and LRN schemes will be important to Guildford and the wider region in providing some congestion relief as well as safety benefits before Government and Highways England confirm their definite proposals for transforming the A3 Guildford through the Road Period 2 scheme.
- 4.3.10 Appendix 5 is a figure showing the relationship between the phasing of developments and transport schemes. The data for the phasing of developments is drawn from Appendix 1. This is an update to Figure A8-B from the Transport topic paper (December 2017).
- 4.3.11 The Study of Performance of A3 Trunk Road Interchanges in Guildford Urban Area to 2024 Under Development Scenarios (Mott MacDonald, April 2018) assesses the impacts of mainline queuing resulting from blocking back of traffic exiting at A3 Guildford diverge junctions in the peak periods and the operation of merging and diverging at junctions in the peak periods. This responds to the issues raised by Highways England with respect to the impact of proposed planned development in the Submission Local Plan on the Guildford section of the A3 in the period to 2024, the earliest date for the start of construction on the A3 Guildford RIS scheme. This concludes as follows:

*‘The overall conclusion of the report is that, whilst recurrent congestion will continue to be experienced, traffic from the Submission Local Plan allocations should not have a significant detrimental impact on the operation of the A3 through the Guildford urban area. Indeed, the proposed improvements at the Hospital junction and Tesco roundabout, in combination with widening of the A3 slip road, should have major benefits in preventing queuing on the off-slip extending back onto the A3 northbound main carriageway.’*
- 4.3.12 Whilst a significant detrimental impact is avoided with the proposed trajectory, the assessment does highlight the potential impact of planned development in the early years on the operation of the A3 through Guildford. For instance, a notable detrimental impact on the A3 Off-slip at Stoke Junction during peak hours is forecast (Table 19 in the ) and whilst worsening of performance at other A3 junctions is small, junction performance – in absolute terms – remains a significant issue at the A3 Off-slip at Dennis Junction and the A3 Off-slip at Cathedral with both experiencing degrees of saturation exceeding 90% during the morning peak hour.
- 4.3.13 It should be noted that this assessment is limited to the trajectory proposed in the Submission Local Plan.

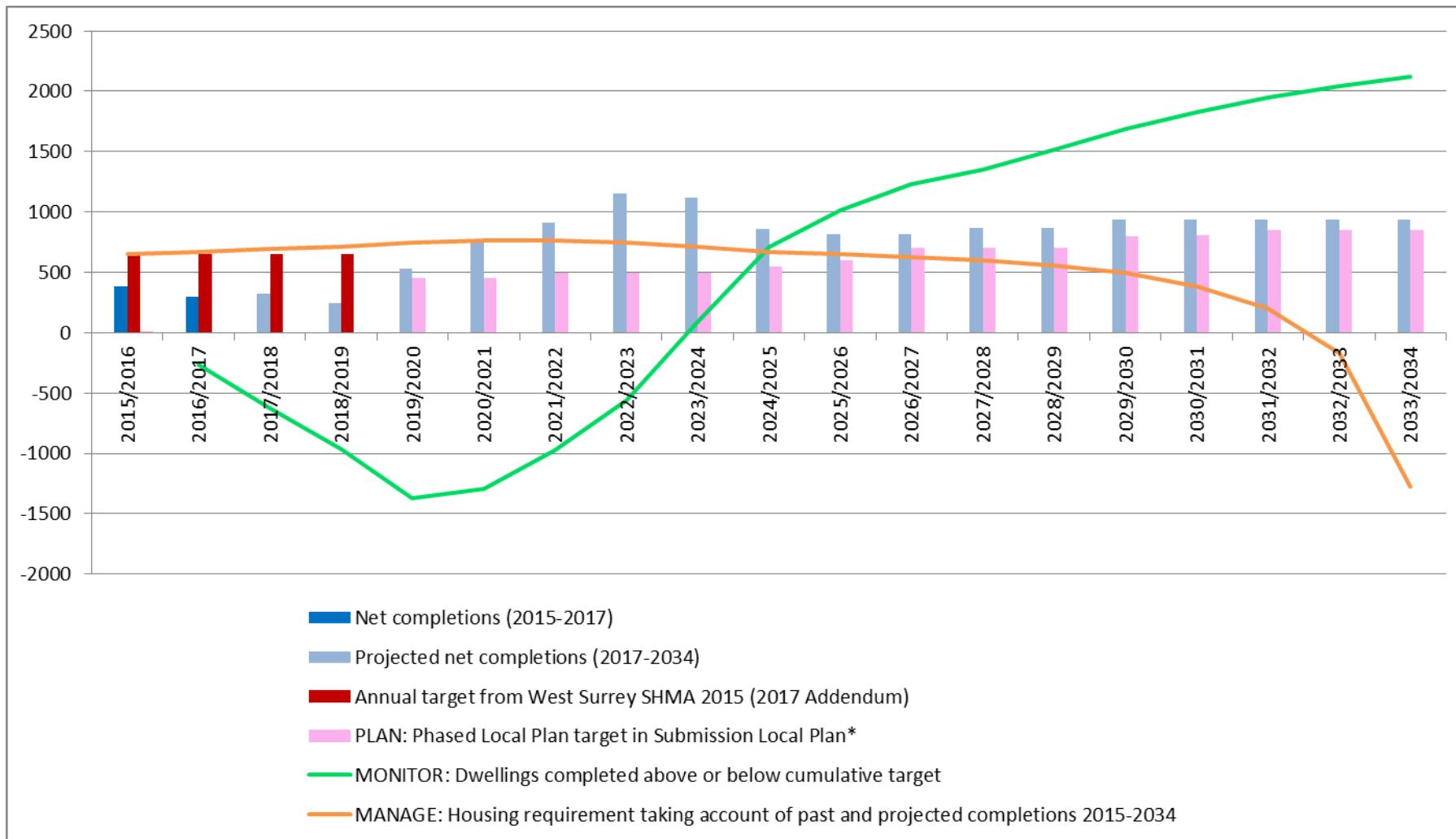
- 4.3.14 The Council is undertaking design work on other schemes which will provide mitigation to the A3 through Guildford, namely NR1, NR2, and SMC1-6. However, the lead in times for these schemes are longer, variously they may require third party land, and in the case of the new railway station, is being progressed through Network Rail's GRIP process and ultimately will require track possessions. In April 2018, Guildford Borough Council and Surrey County Council secured funding from the Enterprise M3 Local Enterprise Partnership to implement Phase 1 of the SMC1 scheme (Sustainable Movement Corridor: West). Funding of the other schemes will either be achieved through developer obligations (Section 106), developer contributions, LEP funding or Central Government funding, which at this point has not been secured.
- 4.3.15 There are potential opportunities to accelerate the transport schemes identified in the paragraph above, or even to identify and bring forward further new schemes. However, based on our discussions to date with site promoters, we are not sufficiently confident that they would be minded to invest additional developer monies in funding the acceleration of identified or new transport schemes to facilitate additional early delivery, when the prospect of a Government-funded A3 Guildford RIS scheme is forthcoming.
- 4.3.16 The inspector will be mindful of Highways England's concerns regarding the impact of planned development on the SRN, as set out in the Duty to Cooperate topic paper (December 2017), specifically Highways England's consultation representations, and the Council's responses, are set out on pages 86-145. The Council has invested significant resources in seeking to address these concerns. A multi-modal programme of schemes is advanced in the Infrastructure Schedule including those intended to mitigate the principal adverse impacts of planned developments on the A3 in the period in advance of an A3 Guildford RIS scheme with construction anticipated to commence in 2024. At the time of writing, the Council is actively engaged with Highways England in preparing a Statement of Common Ground which, amongst other matters, seeks to reach a common position on the relationship of the trajectory of planned development in the earlier years of the plan with the targeted improvements on the SRN and schemes on the adjacent LRN, in the period advance of the A3 Guildford RIS scheme.

## Appendix 4.1 – Housing Trajectory (table) for an OAN of 654

	Pre-adoption					First five years					6-10 YEARS					11 - 15 YEARS					Total
	2015/2016	2016/2017	2017/2018	2018/2019	2019/2020	2020/2021	2021/2022	2022/2023	2023/2024	2024/2025	2025/2026	2026/2027	2027/2028	2028/2029	2029/2030	2030/2031	2031/2032	2032/2033	2033/2034		
Completions	387	294	319																		1000
Outstanding capacity (Commenced)				242													14	13	13	13	308
Outstanding capacity (Approved)					181	181	181	182													725
~ Ash and Tongham (including those subject to Grampian)					185	185	185	186	186												927
~ Howard of Effingham					20	60	60	60	60	35											295
~ Guildford Station								138	151	149											438
Windfall					30	30	30	30	30	60	60	60	60	60	60	60	60	60	60	60	750
Rural exception					6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	90
Town Centre										117	117	118	118	118	55	55	55	55	55	55	863
Guildford urban area (excluding SARP)					37	37	37	37	37	23	22	22	22	22	21	21	21	21	20	20	399
Slyfield Area Regeneration Plan										100	100	100	100	100	100	100	100	100	100	100	1000
Ash and Tongham (urban area)										7	7	7	7	7	4	4	4	4	4	3	54
Ash and Tongham extension (currently countryside)										93	93	93	93	93	94	81	81	81	81	81	871
Within villages					16	16	16	15	15	3	2	2	2	2	13	13	13	13	13	13	154
Villages (land proposed to be inset from the Green Belt)					46	46	45	45	45	5	5	5	5	5	4	4	4	4	4	4	272
PDL in the Green Belt					13	13	13	14	14	56	56	56	55	55							345
Proposed new settlement (former Wisley airfield)									50	100	150	150	150	200	200	200	200	200	200	2000	
<b>Extensions to urban areas and villages</b>																					
Proposed extension to urban area (Gosden Hill, Guildford)									50	100	100	100	100	100	210	210	210	210	210	210	1700
Proposed extension to urban area (Blackwell Farm, Guildford)									50	100	100	100	100	100	170	170	170	170	170	170	1500
Land north of Keens Lane, Guildford								38	38	37	37										150
Land to the north of West Horsley								30	30	30	30										120
Land to the west of West Horsley								34	34	34	33										135
Land near Horsley Railway Station, Ockham Road North								25	25	25	25										100
Land at Garlick's Arch, Send Marsh/Burnt Common and Ripley								50	50	150	150										400
Land west of Winds Ridge and Send Hill, Send								20	20												40
<b>Potential housing provision</b>	<b>387</b>	<b>294</b>	<b>319</b>	<b>242</b>	<b>534</b>	<b>771</b>	<b>908</b>	<b>1152</b>	<b>1117</b>	<b>855</b>	<b>818</b>	<b>819</b>	<b>868</b>	<b>869</b>	<b>938</b>	<b>937</b>	<b>937</b>	<b>936</b>	<b>935</b>	<b>14636</b>	

	Pre-adoption					First five years					6-10 YEARS					11 - 15 YEARS					Total
	2015/2016	2016/2017	2017/2018	2018/2019	2019/2020	2020/2021	2021/2022	2022/2023	2023/2024	2024/2025	2025/2026	2026/2027	2027/2028	2028/2029	2029/2030	2030/2031	2031/2032	2032/2033	2033/2034		
Net completions (2015-2017)	387	294																			
Projected net completions (2017-2034)			319	242	534	771	908	1152	1117	855	818	819	868	869	938	937	937	936	935		
Cumulative completions (past and projected)	387	681	1000	1242	1776	2547	3455	4607	5724	6579	7397	8216	9084	9953	10891	11828	12765	13701	14636		
Cumulative annual target	654	1308	1962	2616	3066	3516	4016	4516	5016	5566	6166	6866	7566	8266	9066	9876	10726	11576	12426		
Annual target from West Surrey SHMA 2015 (2017 Addendum)	654	654	654	654																	
Phased target in Submission Local Plan					450	450	500	500	500	550	600	700	700	700	800	810	850	850	850		
MONITOR: Dwellings completed above or below cumulative target		267	-627	-962	-1374	-1290	-969	-561	91	708	1013	1231	1350	1518	1687	1825	1952	2039	2125		
MANAGE: Housing requirement taking account of past and projected completions 2015-2034	654	669	691	714	746	761	760	748	711	670	650	629	601	557	495	384	199	-170	-1275		
Potential affordable housing provision	125	32	108	167	64	294	349	382	441	324	309	310	329	330	352	352	351	351	351		

## Appendix 4.2 – Housing Trajectory (graph) for an OAN of 654



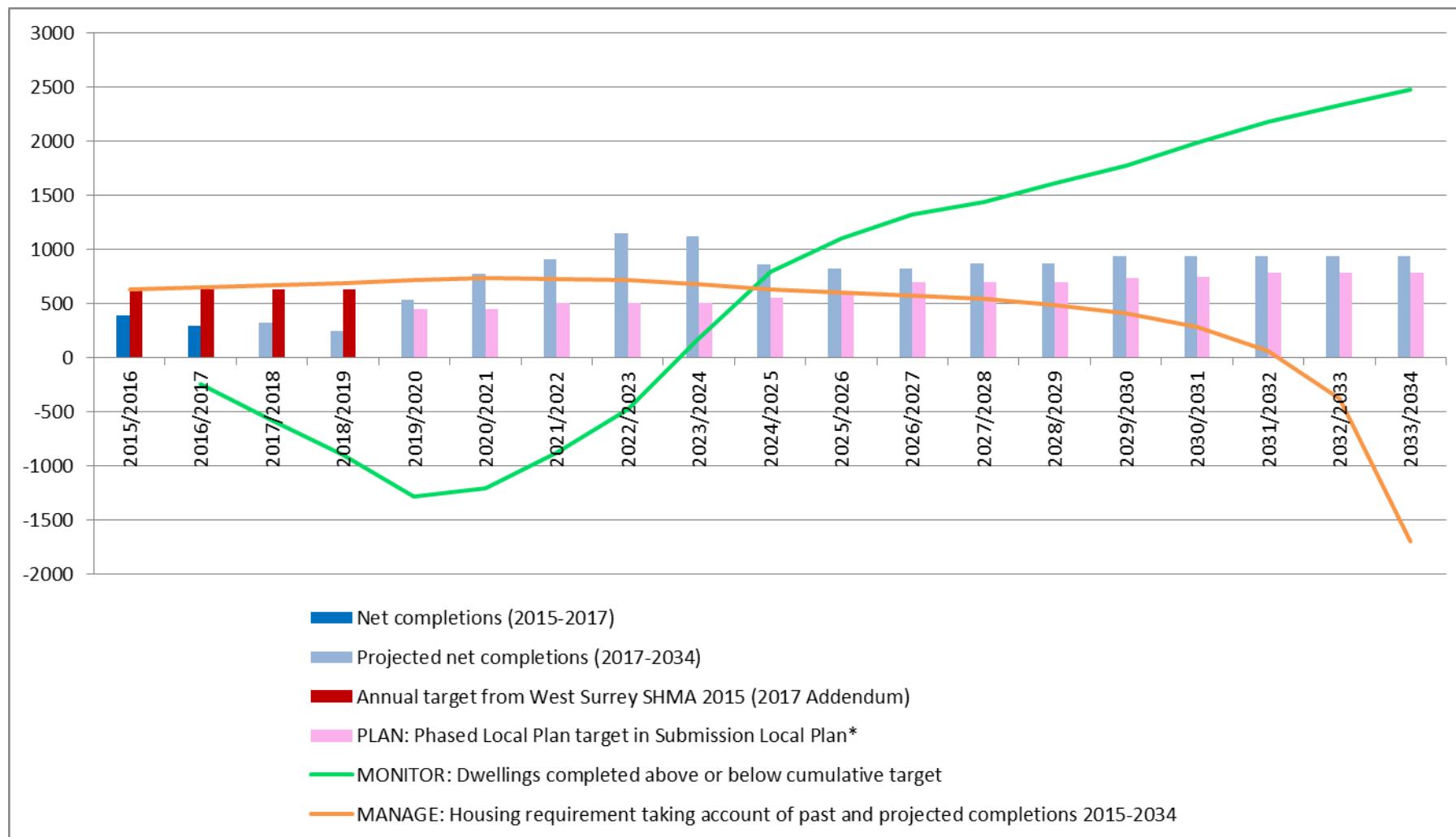
## Appendix 4.3 – Housing Trajectory (table) for an OAN of 632<sup>22</sup>

	Pre-adoption					First five years					6-10 YEARS					11 - 15 YEARS					Total
	2015/2016	2016/2017	2017/2018	2018/2019	2019/2020	2020/2021	2021/2022	2022/2023	2023/2024	2024/2025	2025/2026	2026/2027	2027/2028	2028/2029	2029/2030	2030/2031	2031/2032	2032/2033	2033/2034		
Completions	387	294	319		242																1000
Outstanding capacity (Commenced)					181	181	181	182									14	13	13	13	308
Outstanding capacity (Approved)					185	185	185	186	186												725
~ Ash and Tongham (including those subject to Grampian)					20	60	60	60	60	35											927
~ Howard of Effingham								138	151	149											295
~ Guildford Station																					438
Windfall					30	30	30	30	30	60	60	60	60	60	60	60	60	60	60	60	750
Rural exception					6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	90
Town Centre										117	117	118	118	118	55	55	55	55	55	55	863
Guildford urban area (excluding SARP)					37	37	37	37	23	22	22	22	22	21	21	21	21	20	20	20	399
Slyfield Area Regeneration Plan										100	100	100	100	100	100	100	100	100	100	100	1000
Ash and Tongham (urban area)										7	7	7	7	7	4	4	4	4	4	4	54
Ash and Tongham extension (currently countryside)										93	93	93	93	93	94	81	81	81	81	81	871
Within villages					16	16	16	15	15	3	2	2	2	2	13	13	13	13	13	13	154
Villages (land proposed to be inset from the Green Belt)					46	46	45	45	45	5	5	5	5	5	4	4	4	4	4	4	272
PDL in the Green Belt					13	13	13	14	14	56	56	56	55	55							345
Proposed new settlement (former Wisley airfield)										50	100	150	150	150	200	200	200	200	200	200	2000
<b>Extensions to urban areas and villages</b>																					
Proposed extension to urban area (Gosden Hill, Guildford)										50	100	100	100	100	210	210	210	210	210	210	1700
Proposed extension to urban area (Blackwell Farm, Guildford)										50	100	100	100	100	170	170	170	170	170	170	1500
Land north of Keens Lane, Guildford										38	38	37	37								150
Land to the north of West Horsley										30	30	30	30								120
Land to the west of West Horsley										34	34	34	33								135
Land near Horsley Railway Station, Ockham Road North										25	25	25	25								100
Land at Garlick's Arch, Send Marsh/Burnt Common and Ripley										50	50	150	150								400
Land west of Winds Ridge and Send Hill, Send										20	20										40
Potential housing provision	387	294	319	242	534	771	908	1152	1117	855	818	819	868	869	938	937	937	936	935	14636	

	Pre-adoption					First five years					6-10 YEARS					11 - 15 YEARS					Total
	2015/2016	2016/2017	2017/2018	2018/2019	2019/2020	2020/2021	2021/2022	2022/2023	2023/2024	2024/2025	2025/2026	2026/2027	2027/2028	2028/2029	2029/2030	2030/2031	2031/2032	2032/2033	2033/2034		
Net completions (2015-2017)	387	294		319	242	534	771	908	1152	1117	855	818	819	868	869	938	937	937	936	935	
Projected net completions (2017-2034)																					
Cumulative completions (past and projected)	387	681	1000	1242	1776	2547	3455	4607	5724	6579	7397	8216	9084	9953	10891	11828	12765	13701	14636		
Cumulative annual target	632	1264	1896	2528	2978	3428	3928	4428	4928	5478	6078	6778	7478	8178	8912	9656	10440	11224	12008		
Annual target from West Surrey SHMA 2015 (2017 Addendum)	632	632	632	632																	
Phased target in Submission Local Plan						450	450	500	500	500	550	600	700	700	700	734	744	784	784	784	
MONITOR: Dwellings completed above or below cumulative target			-245	-583	-896	-1286	-1202	-881	-473	179	796	1101	1319	1438	1606	1775	1979	2172	2325	2477	
MANAGE: Housing requirement taking account of past and projected completions 2015-2034	632	646	666	688	718	731	728	713	673	628	603	576	542	487	411	279	60	-379	-1693		

22 The phased target has been amended from that in the Submission Local Plan by a proportionate amount in each year in years 11 – 15 in order to ensure that the total requirement sums to 12,008 (632 \* 19 years)

## Appendix 4.4 – Housing Trajectory (graph) for an OAN of 632



#### **Appendix 4.5: Relationship between phasing of development and transport schemes**

	Pre-adoption					First five years					6 - 10 YEARS					11 - 15 YEARS					2034/ 2035+	Total (Plan period)
	2015/ 2016	2016/ 2017	2017/ 2018	2018/ 2019	2019/ 2020	2020/ 2021	2021/ 2022	2022/ 2023	2023/ 2024	2024/ 2025	2025/ 2026	2026/ 2027	2027/ 2028	2028/ 2029	2029/ 2030	2030/ 2031	2031/ 2032	2032/ 2033	2033/ 2034			
Completions	387	294	319		242											14	13	13	13	13	1000	
Outstanding capacity (Commenced)					181	181	181	182								14	13	13	13	13	308	
Outstanding capacity (Approved)					185	185	185	186	186												725	
~ Ash and Tongham (including those subject to Grampian)					20	60	60	60	60	35											927	
~ Howard of Effingham								138	151	149											295	
~ Guildford Station																					438	
Windfall					30	30	30	30	30	60	60	60	60	60	60	60	60	60	60	750		
Rural exception					6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	90		
Town Centre										117	117	118	118	118	55	55	55	55	55	863		
Guildford urban area (excluding SARP)					37	37	37	37	37	23	22	22	22	22	21	21	21	20	20	399		
Slyfield Area Regeneration Plan										100	100	100	100	100	100	100	100	100	100	500	1000	
Ash and Tongham (urban area)										7	7	7	7	7	4	4	4	4	3	54		
Ash and Tongham extension (currently countryside)										93	93	93	93	94	81	81	81	81	81	871		
Within villages					16	16	16	15	15	3	2	2	2	2	13	13	13	13	13	154		
Villages (land proposed to be inset from the Green Belt)					46	46	45	45	45	5	5	5	5	5	4	4	4	4	4	272		
PDL in the Green Belt					13	13	13	14	14	56	56	56	55	55						345		
Proposed new settlement (former Wisley airfield)									50	100	150	150	200	200	200	200	200	200	200	2000		
<b>Extensions to urban areas and villages</b>																						
Proposed extension to urban area (Gosden Hill, Guildford)										50	100	100	100	100	100	210	210	210	210	210	1700	
Proposed extension to urban area (Blackwell Farm, Guildford)										50	100	100	100	100	100	170	170	170	170	170	1500	
Land north of Keens Lane, Guildford										38	38	37	37								150	
Land to the north of West Horsley										30	30	30	30								120	
Land to the west of West Horsley										34	34	34	33								135	
Land near Horsley Railway Station, Ockham Road North, West Horsley										25	25	25	25								100	
Land at Garlick's Arch, Send Marsh/Burnt Common and Ripley										50	50	150	150								400	
Land west of Winds Ridge and Send Hill, Send										20	20										40	
<b>Potential housing provision</b>	<b>387</b>	<b>294</b>	<b>319</b>	<b>242</b>	<b>534</b>	<b>771</b>	<b>908</b>	<b>1152</b>	<b>1117</b>	<b>855</b>	<b>818</b>	<b>819</b>	<b>868</b>	<b>869</b>	<b>938</b>	<b>600</b>	<b>14636</b>					
<b>TRANSPORT SCHEMES</b>																						
NR1	Guildford rail station capacity and interchange improvements																					
NR2	New rail station at Guildford West (Park Barn)																					
NR3	New rail station at Guildford East (Merrow)																					
NR4	Electrification of North Downs Line, facilitating increased service frequency																					
NR5	Portsmouth Direct Line improvements facilitating increased service frequency																					
NR6	North Downs Line (Great Western Railway) service frequency and timetable improvements																					
SRN2	A3 Guildford (A320 Stoke interchange junction to A31 Hog's Back junction) 'Road Investment Strategy' scheme (E31)																					
SRN3	M25 Junction 10/A3 Wisley interchange 'Road Investment Strategy' scheme (E16)																					
SRN4	New A3/A3100 Burpham junction with relocated A3 southbound off-slip and new A3 southbound on-slip																					
SRN5	M25 Junctions 10-16 'Road Investment Strategy' scheme (E15)																					
SRN7	A3 northbound off-slip lane widening at University Interchange (approaching Tesco roundabout) improvement scheme																					
SRN8	A3 southbound off-slip lane widening to A320 Stoke Interchange improvement scheme																					
SRN9	A3 northbound on-slip at A247 Clandon Road (Burnt Common)																					
SRN10	A3 southbound off-slip at A247 Clandon Road (Burnt Common)																					
LRN1	Guildford Town Centre Transport Package																					
LRN2	A3/Egerton Road Tesco Roundabout improvement scheme																					
LRN3	New signalised junction from Blackwell Farm site to A31 Farnham Road																					
LRN4	Access road at Blackwell Farm site with link to Egerton Road																					
LRN5	Interventions to address potential highway performance issues resulting from development at Blackwell Farm site																					
LRN6	Interventions to address potential highway performance issues resulting from development at Gosden Hill Farm site																					
LRN7	Interventions to address potential highway performance issues resulting from development at former Wisley Airfield site.																					
LRN8	Interventions to address potential highway performance issues ... resulting from development at SARP site																					
LRN9	A323 Ash Road, Ash Street and Guildford Road (Ash) traffic management and environmental improvement scheme																					
LRN10	B3411 Ash Hill Road (Ash) traffic management and environmental improvement scheme																					
LRN11	B3411 Ash Hill Road/A323 Guildford Road (Ash) junction improvement scheme																					
LRN12	B3411 Ash Vale Road (Ash Vale) environmental improvement scheme																					
LRN13	A323 Aldershot Road/A331 Blackwater Valley Route (Ash) junction improvement																					

## **Question 5 - Five Year Housing Land Supply**

**5.1 Is the methodological basis for calculating the 5 year housing land supply sound? (The Council's calculations are based on a 20% buffer, the Liverpool methodology and a rising trajectory – see 3.50 of the Council's response to initial questions.)**

5.1.1 The Council's response to this question is still in line with that set out in the Council's response to *Question 3: The housing trajectory* of the Inspector's Initial Questions. The justification for the Council's methodological basis for calculating the five year housing land supply which includes a stepped trajectory can be summarised as follows:

- The Annual Housing Target in Policy S2 is significantly lower than the projected number of homes that is expected to be delivered each year. Projected delivery is significantly greater than 654 homes per year (Guildford's objectively assessed need (OAN)) in each year following adoption of the plan except for the first year. A modification is proposed to S2 to make this clear and to include the housing trajectory within the Plan.
- The purpose of the Annual Housing Target is to calculate the housing requirement for five year housing land supply purposes. The 'excess' supply projected to be delivered each year over and above the Annual Housing Target contributes towards meeting the severe backlog accrued in the four years of the plan prior to adoption and the additional 20% buffer for poor past performance. These issues are due to the significant constraints that currently prevent housing delivery from coming forward. This includes 89% Green Belt, significant areas covered by AONB or Special Protection Area, and high flood risk particularly in the town centre. Housing delivery will continue to be less than half of what is needed (approximately 300 homes per year) until the plan is adopted and sites are released from the Green Belt.
- It is considered that it is simply unrealistic to meet the backlog together with the 20% buffer within the first 5 years, however desirable it might be, given in particular the extent of backlog and the increase in delivery that would be required.

5.1.2 The principle of a stepped trajectory and the instances when it might be considered justified is proposed to be included in the National Planning Practice Guidance (NPPG). The draft NPPG which was recently subject to a consultation period included the following:

***"What happens in areas with stepped rather than annual average requirements?***

*As an alternative to using an annual average requirement, plan makers are able, where justified, to reflect their plan trajectory more closely by using a series of stepped requirements.*

*A stepped requirement may be necessary where there is to be a significant change in the level of housing requirements between the emerging and previous adopted plan and/or where strategic sites are likely to be delivered later in the plan period. Plan makers will need to set out evidence to support using stepped requirement figures at the plan making and examination stage, and not seek to unnecessarily delay meeting identified development needs.*

*Stepped trajectories will need to ensure that plan requirements are met fully within the plan period.*

*Where plan makers have reflected the plan trajectory with stepped rather than average annual requirements, the five year land supply will be measured against the specific stepped requirements for the particular five year period.”*

- 5.1.3 This indicates support for the use of this approach where it can be justified. The possible circumstances where this might apply are both applicable in the Guildford context, namely a step change in housing requirement and a strategy that relies on strategic sites where a significant proportion of the housing is expected to be delivered later in the plan period.
- 5.1.4 The draft NPPG is also proposing to provide greater clarity regarding the appropriateness of a Liverpool rather than Sedgefield approach to past undersupply.

***“How quickly should past shortfalls be addressed?***

*Local planning authorities should deal with deficits or shortfalls against planned requirements within the first five years of the plan period. If an area wishes to deal with past under delivery over a longer period, then this should be established as part of the plan making and examination process rather than on a case by case basis on appeal.*

*Where local planning authorities are unable to address past shortfalls over a five year period due to the scale of shortfalls they may need to reconsider their approach.”*

- 5.1.5 This again indicates that through the examination process, there may be circumstances which justify dealing with the accrued deficit over a longer period.

***5.2 How many years' supply of deliverable housing land exist at present, having regard to the housing trajectory, the current supply position, and the plan's housing allocations?***

- 5.2.1 On the basis of an OAN of 654 dpa, the five year housing land supply position at April 2018 is 2.56 years. On the basis of a revised OAN of 632 dpa (as identified in the Council's response to Question 2) the land supply is 2.68 years. See Appendix 1 (for OAN of 654) and Appendix 2 (for OAN of 632) for more detail on how this has been calculated. This is on the basis of a Sedgefield approach and a 20% buffer, and does not include any sites that do not meet the definition of deliverable as set out in the

NPPF<sup>23</sup>. This requires that sites should offer a suitable location for development **now**. For this reason, the current land supply does not include sites that require the emerging plan to be adopted in order to be suitable (namely Green Belt sites). If all sites assumed in the relevant period of the trajectory could be included then the Council's five year housing land supply position would be 3.55 (for OAN of 654) or 3.71 (for OAN of 632) years (using the Sedgefield approach).

- 5.2.2 As set out in the Council's response to *Question 2* of the Inspector's Matters and Issues, the ONS is due to release new 2016-based Sub-National Population Projections on 24 May 2018. The Council will update the examination on the implications of these at the Hearings. As part of incorporating the latest set of figures there may be the opportunity to re-base the start of the plan period in order to reflect the latest baseline data. This could be considered as part of any updates to the five year housing land supply position.
  - 5.2.3 This demonstrates the necessity of adopting the proposed stepped Annual Housing Target and the Liverpool approach to spreading the backlog.
- 5.3 *Is the plan resilient and flexible enough to maintain 5 or more years' supply of deliverable housing land going forward? (See Appendix 7 of the Housing Delivery topic paper).***
- 5.3.1 The table in Appendix 7 of the Housing Delivery topic paper has been updated to reflect the latest figures. This is included in Appendix 3 (OAN of 654) and Appendix 4 (OAN of 632). This illustrates that at adoption (expected 2019/20), using the method outlined above, the Council would be able to demonstrate a five year housing land supply of 6.53 (for OAN of 654) or 6.6 (for OAN of 632) years. Moving forward through the plan period, the land supply position would remain above six years' worth of supply.
  - 5.3.2 The Council considers that this ensures that the plan is resilient and enables sufficient flexibility to cope with changing circumstances. This ensures a robust position and reduces the risk that the plan becomes quickly out of date.

---

<sup>23</sup> NPPF, paragraph 47, footnote 11.

## Appendix 5.1: Current five year housing land supply at April 2018 (OAN of 654)

### Requirement

OAN	<b>654</b>
-----	------------

	2015/2016	2016/2017	2017/2018	Total
Housing completions (net)	387	294	319	1,000
Deficit	267	360	335	962

Requirement over five years (654 x 5)	3,270
Deficit + requirement (3,270 + 962)	4,232
(Deficit + requirement) plus 20% (4,232 x 1.2)	5,078

### Supply

	2018/2019	2019/2020	2020/2021	2021/2022	2022/2023	<b>Total</b>
Outstanding capacity (Commenced)	242					<b>242</b>
Outstanding capacity (Approved)		386	426	564	579	<b>1,955</b>
Windfall		30	30	30	30	<b>120</b>
Rural exception		6	6	6	6	<b>24</b>
Town Centre						<b>0</b>
Guildford urban area		37	37	37	37	<b>148</b>
Ash and Tongham (urban area)						<b>0</b>
Ash and Tongham extension (currently countryside)						<b>0</b>
Within villages		16	16	16	15	<b>63</b>
PDL in the Green Belt		13	13	13	14	<b>53</b>
<b>Total</b>	<b>242</b>	<b>488</b>	<b>528</b>	<b>666</b>	<b>681</b>	<b>2,605</b>

### Five year housing land supply

Requirement	5,078
Supply	2,605
5YHLS	2.56

## Appendix 5.2: Current five year housing land supply at April 2018 (OAN of 632)

### Requirement

OAN	<b>632</b>
-----	------------

	2015/2016	2016/2017	2017/2018	Total
Housing completions (net)	387	294	319	1,000
Deficit	245	338	313	896

Requirement over five years (654 x 5)	<b>3,160</b>
Deficit + requirement (3,160 + 896)	<b>4,056</b>
(Deficit + requirement) plus 20% (4,056 x 1.2)	<b>4,867</b>

### Supply

	2018/2019	2019/2020	2020/2021	2021/2022	2022/2023	<b>Total</b>
Outstanding capacity (Commenced)	<b>242</b>					<b>242</b>
Outstanding capacity (Approved)		386	426	564	579	<b>1,955</b>
Windfall		30	30	30	30	<b>120</b>
Rural exception		6	6	6	6	<b>24</b>
Town Centre						<b>0</b>
Guildford urban area		37	37	37	37	<b>148</b>
Ash and Tongham (urban area)						<b>0</b>
Ash and Tongham extension (currently countryside)						<b>0</b>
Within villages		16	16	16	15	<b>63</b>
PDL in the Green Belt		13	13	13	14	<b>53</b>
<b>Total</b>	<b>242</b>	<b>488</b>	<b>528</b>	<b>666</b>	<b>681</b>	<b>2,605</b>

### Five year housing land supply

Requirement	<b>4,867</b>
Supply	<b>2,605</b>
5YHLS	<b>2.68</b>

### Appendix 5.3: Five year housing land supply – Liverpool Phased (OAN of 654)

	Pre-adoption				First five years					6-10 YEARS					11 - 15 YEARS				Total	
	2015/2016	2016/2017	2017/2018	2018/2019	2019/2020	2020/2021	2021/2022	2022/2023	2023/2024	2024/2025	2025/2026	2026/2027	2027/2028	2028/2029	2029/2030	2030/2031	2031/2032	2032/2033	2033/2034	
Annual housing target	654	654	654	654	450	450	500	500	500	550	600	700	700	700	800	810	850	850	850	12426
Years remaining	19	18	17	16	15	14	13	12	11	10	9	8	7	6	5	4	3	2	1	
Supply	387	294	319	242	534	771	908	1152	1117	855	818	819	868	869	938	937	937	936	935	14636
Backlog/Surplus		-267	-627	-962	-1374	-1290	-969	-561	91	708	1013	1231	1350	1518	1687	1825	1952	2039	2125	
Backlog/Surplus annualised over remaining plan period		-15	-37	-60	-92	-92	-75	-47	8	71	113	154	193	253	337	456	651	1020	2125	
5 year requirement + (5x annualised backlog/surplus)		3066	2936	2892	2855	2858	2961	3023	3084	3009	2896	2937	2941	2896	2745	2473				
5 year requirement plus 20% buffer		3679	3523	3471	3426	3430	3553	3627	3701	3610	3475	3525	3529	3475	3294	2968				
5 year supply		1776	2160	2774	3607	4482	4803	4850	4761	4477	4229	4312	4431	4549	4617	4683				
5 year housing land supply	<b>2.41</b>	<b>3.07</b>	<b>4.00</b>	<b>5.26</b>	<b>6.53</b>	<b>6.76</b>	<b>6.69</b>	<b>6.43</b>	<b>6.20</b>	<b>6.08</b>	<b>6.12</b>	<b>6.28</b>	<b>6.55</b>	<b>7.01</b>	<b>7.89</b>					

## Appendix 5.4: Five year housing land supply – Liverpool Phased (OAN of 632)

	Pre-adoption				First five years					6-10 YEARS					11 - 15 YEARS					Total
	2015/2016	2016/2017	2017/2018	2018/2019	2019/2020	2020/2021	2021/2022	2022/2023	2023/2024	2024/2025	2025/2026	2026/2027	2027/2028	2028/2029	2029/2030	2030/2031	2031/2032	2032/2033	2033/2034	
Annual housing target	632	632	632	632	450	450	500	500	500	550	600	700	700	700	734	744	784	784	784	12008
Years remaining	19	18	17	16	15	14	13	12	11	10	9	8	7	6	5	4	3	2	1	
Supply	387	294	319	242	534	771	908	1152	1117	855	818	819	868	869	938	937	937	936	935	14636
Backlog/Surplus		-245	-583	-896	-1286	-1202	-881	-473	179	796	1101	1319	1438	1606	1775	1979	2172	2325	2477	
Backlog/Surplus annualised over remaining plan period		-14	-34	-56	-86	-86	-68	-39	16	80	122	165	205	268	355	495	724	1163	2477	
5 year requirement + (5x annualised backlog/surplus)	2978	2864	2835	2812	2829	2929	2989	3047	2969	2852	2822	2754	2635	2408	2055					
5 year requirement plus 20% buffer	3574	3437	3403	3374	3394	3515	3587	3657	3562	3422	3387	3304	3162	2889	2466					
5 year supply	1776	2160	2774	3607	4482	4803	4850	4761	4477	4229	4312	4431	4549	4617	4683					
5 year housing land supply	<b>2.48</b>	<b>3.14</b>	<b>4.08</b>	<b>5.34</b>	<b>6.60</b>	<b>6.83</b>	<b>6.76</b>	<b>6.51</b>	<b>6.28</b>	<b>6.18</b>	<b>6.37</b>	<b>6.70</b>	<b>7.19</b>	<b>7.99</b>	<b>9.50</b>					

## **Question 6 - Homes for All**

*Please note: this response should be read alongside the Council's responses to Items 7 (see GBC-LPSS-001) and 9 - 18 (see GBC-LPSS-002) of the Inspector's Initial Questions.*

**Are the plan's policies sound and effective in delivering a wide variety of quality homes to provide for the needs of all the community? Relevant issues are:**

- 6.1 The plan's proposals in respect of a mix of sizes and types of home, including family homes and homes for older people.**
- 6.2 The delivery of affordable homes (having regard to Item 14 of my Initial Questions).**
- 6.3 The provision of accessible homes.**
- 6.4 The provision of specialist accommodation.**
- 6.5 The provision of student accommodation.**
- 6.6 Sites to meet the accommodation needs of Gypsies, Travellers and Travelling Showpeople.**
- 6.7 Houses in multiple occupation.**
- 6.8 Self-build and custom homes.**
- 6.9 Rural exception sites.**

### Summary

- 6.1 The Council considers the Plan's policies to be sound and effective in delivering a wide variety of quality homes to provide for the diverse needs of the borough's residents over the Plan period. These policies are informed by a robust and up to date body of evidence<sup>24</sup> that reflects the wide range of housing needs within the borough and potential for meeting this need.
- 6.2 The Council has taken positive steps to address these needs through the Local Plan, both through policies and site allocations. These policies are primarily:
  - Policy H1: Homes for all: This housing policy includes detailed requirements to ensure an appropriate housing mix and accessibility of housing; provision for specialist accommodation, student housing, gypsies, travellers and travelling showpeople; and support for proposals for houses in multiple occupation and self-build and custom housing.
  - Policy H2: Affordable homes: This housing policy (along with Policy H3) includes provisions to ensure the delivery of a range of affordable homes to meet need across the borough.
- 6.3 In addition to these policies, the Local Plan's Design Policy aims to ensure that homes and neighbourhoods are of a high quality design. Furthermore, the site allocations policies and requirements have, where appropriate, been designed to

---

<sup>24</sup> Refer for instance to submission documents GBC-LPSS-SD-001 – GBC-LPSS-006c.

supplement the housing policies to ensure delivery of housing which meets the needs identified.

- 6.4 In producing the Local Plan, the Council has been careful to ensure that the policies developed in order to address needs do not threaten delivery. In this regard, the Plan's policy requirements (including inter alia those related to affordable housing thresholds and accessibility standards) were considered to not unduly burden the delivery of residential development in Guildford borough<sup>25</sup>. Where appropriate provisions have been included to allow for flexibility to ensure that policies are effective in delivering the form of housing needed (e.g. in relation to affordable housing provision and thresholds, rural exception schemes).
- 6.5 Delivering the right mix of dwellings in the right quantum will help people have a wide choice of accommodation and ultimately widen opportunities for home ownership and will increase the availability of all types and tenures of housing required to meet need in Guildford borough. Further details and background information on these issues are within the Councils Topic Paper: [Housing type, tenure and mix](#) (December 2017)<sup>26</sup>.

**6.1 *The plan's proposals in respect of a mix of sizes and types of home, including family homes and homes for older people.***

**Summary**

- 6.1.1 Based on its evidence, the Council considers that the Local Plan policies are effective in ensuring that an appropriate mix of sizes and types of home are delivered over the Plan period. This includes by means of appropriate requirements in Policy H1 relating to housing mix and choice, as well as housing allocations, including those specifically catering for homes for older people.

**Housing mix of sizes and tenures**

- 6.1.2 The West Surrey Strategic Housing Market Assessment (SHMA) (2015)<sup>27</sup> (page 131 and 132) analysis found that there was a need for a mix of home sizes across the Housing Market Area that varied depending on the tenure. The SHMA 2015 recommended the following housing size mix as shown in the table below.

**Table 1: Recommended mix of affordable and market housing in Housing Market Area**

Number of bedrooms	Affordable %	Market %
1 bedroom	40%	10%
2 bedroom	30%	30%
3 bedroom	25%	40%
4 bedroom	5%	20%

Source: *West Surrey SHMA 2015*

<sup>25</sup> See paragraph 5.11 of the Local Plan Viability Update, 2017 (see GBC-LPSS-SD-031).

<sup>26</sup> See GBC-LPSS-SD-TP-008.

<sup>27</sup> Submission document ref. GBC-LPSS-SD-001.

6.1.3 The Council has responded to the SHMA's findings by including wording in Policy H1 (1) to require new development to provide a mix of housing tenures, types and sizes appropriate to the site size, characteristics and location. This will enable the (latest) SHMA's findings to guide development whilst ensuring flexibility to achieve the right mix of various sized homes in the right location. It also gives capacity for neighbourhood plans to set locally specific dwelling sizes appropriate to their neighbourhood. Provision of smaller sized homes will help younger people access housing and can also enable older people to downsize if they wish, creating movement in the housing market and freeing up under occupied homes<sup>28</sup>.

#### Housing mix of types

6.1.4 The West Surrey SHMA (2015) and West Surrey Strategic Housing Market Assessment (SHMA): Guildford Addendum Report 2017<sup>29</sup> (2017) considered the need for different types of homes from specific groups within the population:

<b>Type of accommodation</b>	<b>West Surrey SHMA 2015</b>	<b>SHMA Guildford Addendum 2017</b>
	<i>Page no's:</i>	<i>Page no's:</i>
Affordable housing	83-102 (Key findings 124-127)	41-47
Market Housing	Key findings 127-128	70
Housing for older people	134-140	60-62
Specialist homes for older people	141-143	60-62
Registered care housing	144-145	62
People with disabilities	145-146	55-60
Black and minority ethnic households	147-151	n/a
Family households	152-154 & 162	n/a
Young people	154-157	23, 26, 53, 68, 70
Self and custom build homes	157-159	n/a
Service families	159-160	n/a
Student accommodation	72 & Appendix C	63 - 70

6.1.5 The findings from the evidence base in relation to specific accommodation types and how the Council has addressed this through the Submission Local Plan are covered in greater detail in the following sections. However, as an overarching approach to all accommodation the Council has responded to the SHMA's findings by including wording in Policy H1 (1) to require new development to deliver a wide choice of homes to meet a range of accommodation needs as set out in the latest SHMA. This will help ensure that the SHMA's findings are taken into account when considering new residential development and will enable schemes to reflect demographic and market trends. It will help secure new residential development that gets the right balance of homes, offering a good choice of accommodation and ultimately help increase opportunities for home ownership.

<sup>28</sup> Housing and economic needs assessments guidance on Housing for older people.

<sup>29</sup> Submission document ref. GBC-LPSS-SD-003.

## Family homes

- 6.1.6 The Council is aware that within Guildford borough more smaller one, two and three bedroomed affordable and market homes are needed. The West Surrey SHMA 2015 and Addendum 2017 found that within Guildford borough there are approximately 15,635 (29%) households with dependent children (page 152) and there are approximately 4,689 (8.7%) households containing non-dependent children (page 155).
- 6.1.7 The 2015 SHMA found that within the housing market area households with dependent children were four times more likely than other households to be overcrowded (page 153). The data also pointed to lone parents being more disadvantaged and highlighted the need to ensure a reasonable quality of private rented housing (page 154).
- 6.1.8 The Council has responded to the need for more housing, including family homes, by:
- setting a housing target in Policy S2
  - ensuring that a wide choice of homes are built with a mix of types, tenures and sizes as set out in Policy H1
  - allocating sufficient sites to meet the housing need (Policies A1-A57 excluding sites for non-housing uses).
- 6.1.9 The Reasoned Justification of Policy H1 (paragraph 4.2.9) states that it is necessary to plan carefully for family housing, which includes encouraging a reasonable quality and size of accommodation in the private rented sector, in particular two and three bedroomed homes. Ensuring new residential development provides a good mix of homes, particularly smaller homes of various tenures, will help to meet the range of accommodation needs of families.

## Homes for older people

- 6.1.10 Homes for older people covers a wide range of accommodation, from general market housing (sometimes with support given in peoples' own homes) to more specialist accommodation with an element of care. Our evidence base has considered the different types of accommodation that may be required over the plan period to address the housing needs of older people<sup>30</sup>, as listed below.
- Market and affordable housing for those wishing to downsize homes, or where support at home can be given (Use Class C3).
  - Adaptable, flexible and accessible general housing, which is either wheelchair accessible or can be adapted as the needs of the occupants change (Use Class C3).

---

<sup>30</sup> The Housing and economic development needs assessments guidance states that we should identify the needs of different groups including housing for older people, and expands upon the type of dwellings including supporting independent living, specialist accommodation for older people, residential institutions (Use Class C2) and general housing that is already suitable or can be adapted to meet a change in needs.

- Specialised accommodation such as extra care homes or sheltered housing (Use Class C3 or sui generis use).
- Residential institutions such as Care or Nursing Homes for frail elderly people where a greater level of support is needed (Use Class C2).

- 6.1.11 There is some overlap between the different types of accommodation required and it is recognised that it is not a case of one size fits all. Many different types and models of accommodation for older people exist or are emerging to reflect demand. Further background on this issue is set out in pages 15-18 of the Housing type, tenure and mix Topic Paper (2017)<sup>31</sup>.
- 6.1.12 The Council has responded to the SHMA's findings by including specific policies to address the housing needs of older people and by allocating sufficient residential sites in various locations and or differing sizes to meet the need for a variety of housing types and sizes and tenures. Our approach is considered to be sound and will result in the provision of a good mix of types and tenures, as set out in the criteria of policy H1 of the Submission Local Plan, to help meet the differing accommodation needs and demands of people in later life.
- 6.1.13 In brief, Policy H1 will help deliver accommodation for older people by:
- H1 (1) requires residential development to deliver a wide choice of homes and a mix of tenures types and houses
  - H1(3) requires the provision of accessible homes on developments of over 25 homes
  - H1 (4) encourages well designed specialist accommodation in sustainable locations.
- 6.1.14 The reasoned justification of Policy H1 states that it is expected that housing stock will be flexible, accessible, adaptable and age friendly, and support the changing needs of individuals and families at different stages of life (paragraph 4.2.4). Guidance has been included on factors such as a building's layout and good lighting, which can help people with dementia or sight-loss to continue to live as independently as possible.<sup>32</sup> This approach, alongside the requirement for a percentage of accessible accommodation, will help anyone with a long-term health problem or disability.
- 6.1.15 Ensuring new residential development provides a good mix of smaller homes (including wheelchair accessible and adaptable homes) of various tenures will help to meet the needs of all households, including older households wishing to downsize.
- 6.1.16 Looking at specific types of accommodation for older people in more detail, the need for general market and affordable housing for older people is addressed in the section above on housing mix (the provision of smaller sized homes will enable downsizing), and in the Council's submission under 6.4 below on specialist

---

<sup>31</sup> Submission document ref. GBC-LPSS-SD-TP-008.

<sup>32</sup> This reflects RTPI guidance on Dementia (page 9).

accommodation. The Council's response under 6.3 below on accessible homes specifically addresses housing for older people with mobility issues.

### Registered care housing

- 6.1.17 Housing for older people who require an element of care, and residential care homes or nursing homes (in Use Class C2) are addressed separately in the West Surrey SHMA 2015<sup>33</sup> and the Guildford SHMA Addendum 2017<sup>34</sup>. The SHMA methodology excludes the institutional population in residential care from the general household projections and identifies a separate need for 433<sup>35</sup> care home bedspaces between 2015-2034 (page 62).
- 6.1.18 Whilst the Council does not have a set target for Use Class C2 accommodation, the need for this type of accommodation is acknowledged in Policy H1 of the submission Local Plan. Specific sites to provide Use Class C2 accommodation:
- Site A22 Land north of Keens Lane, Guildford – 60 bedspaces
  - Site A35 Former Wisley airfield, Ockham – 100 sheltered/extra care homes (Use Class C2)
- 6.1.19 The Council has therefore identified 160 bedspaces against a need for 433 bedspaces up to 2034. Site A1 at The Plaza is allocated for approximately 90 homes or accommodation for older people (Use Class C2) and planning permission has since been approved for 100 assisted living apartments for older people in sui generis use<sup>36</sup>.
- 6.1.20 As set out in the topic paper, the Council recently lost an appeal<sup>37</sup> to retain land in Use Class C2 at Redwood, Epsom Road, Merrow. The Inspector concluded that:

*"The loss of the existing Class C2 use would be acceptable because the market is likely to deliver the trajectory of C2 bedspaces or their equivalent in new models of provision such as Extra Care Housing. Even if the market failed to do so, I note that the estimated need of 242<sup>38</sup> C2 bedspaces, 12 a year during the ELP period, is not a target. It does not therefore carry the policy importance that attaches to the five year supply of Class C3 dwellings (5YHLS), of which it does not form a part."*

- 6.1.21 The Council has primarily focused on identifying Use Class C3 housing sites, which include an element of specialist housing and accessible homes. This will help ensure a good mix of housing types within a development scheme. The Council recognises the current shift in older people staying in their own home for longer, with home help and support to help them remain independent. The resultant impact will be less

<sup>33</sup> Submission document ref. GBC-LPSS-SD-001

<sup>34</sup> Submission document ref. GBC-LPSS-SD-003.

<sup>35</sup> Guildford SHMA Addendum 2017 page 62 paragraph 6.27: increase of 433 people living in institutions over the 2015-34 period.

<sup>36</sup> Application 17/P/00920 was approved in March 2018. The site is currently for sale and is now projected to be delivered in the 6-10 year period.

<sup>37</sup> Appeal ref: APP/Y3615/W/16/3147135 Site of former Redwood Care Home, 179 Epsom Road, Guildford.

<sup>38</sup> West Surrey SHMA 2015 page 145 para 9.47:the growth in the institutional population...in 2013-2033 period is estimated to be 242 in Guildford.

reliance on sheltered housing and care homes in the future, with a move towards nursing homes in the later stages of life when very frail or ill. The Council has planned for this anticipated shift in demand by:

- planning for a good mix of homes, including accessible and adaptable homes, of different types, sizes and tenures
- allocating sites specifically for Use Class C2
- proposing a criteria within Policy H1(2) that resists the net loss of Use Class C2 accommodation, that protects the existing and allocated sites<sup>39</sup>
- proposing a criteria within Policy H1 (4) that encourages the provision of well-designed specialist forms of accommodation in appropriate sustainable locations. This could include windfall sites to meet market demand.

## **6.2 *The delivery of affordable homes (having regard to Item 14 of my Initial Questions)***

*The Council has responded to the Inspector's initial question 14 regarding the Plan's approach to affordable homes (see GBC-LPSS-002, pages 15-18). This response should be referred to and read in conjunction with the submission below.*

### Summary

- 6.2.1 The Council is of the view that the policies of the Submission Local Plan (2017) in relation to the provision of affordable homes (policies H2 and H3) are sound and effective. The amount and tenure split of affordable housing sought in the Local Plan responds to the high levels of related housing need and affordability concerns in the borough as reflected by the evidence base. The response below includes supplementary justification (to the Council's response to the Inspector's initial Question 14) in support of retaining contribution to affordable housing from residential schemes of between 5 and 10 units.
- 6.2.2 The Council contends that its Local Plan affordable housing policies would be effective and support delivery. There are no undue viability concerns with the policies, and sufficient flexibility is considered to have been allowed for to ensure that schemes may come forward, where viability is a demonstrable issue (See below under "*Effectiveness of affordable housing policy at supporting delivery – viability evidence and ensuring sufficient flexibility in policy*"). Provisions relating to off-site contributions / payment in lieu are further mechanisms the Council has included within policy H2 to ensure schemes come forward and can deliver on affordable housing requirements in a timely manner.

### Affordable housing contributions justification: housing affordability and need in Guildford borough

- 6.2.3 The proposed affordable housing policy is justified firstly on the grounds of the pressing and ongoing affordability issue. The Housing Types, Tenure and Mix Topic Paper (2017)<sup>40</sup> highlighted the serious affordability issue in Guildford borough,

<sup>39</sup> See Councils response to Inspectors Initial Questions, Q11.

<sup>40</sup> Submission document ref. GBC-LPSS-SD-TP-008.

measured as the house price to income ratio (see paragraphs 4.82 – 4.83). This ratio is high relative to the rest of the country and the South East. The ratio of lower quartile workplace earnings to lower quartile house prices in Guildford in 2015<sup>41</sup> was 10.9. This was 53% higher than the average ratio for England of 7.1 and 16% higher than for the average across the South East (9.3). Private rents across all dwelling sizes were 1.6 times the England mean average in 2015<sup>42</sup>, although the topic paper notes that the private rented sector is not a recognised form of affordable housing.

- 6.2.4 The topic paper also mentions at paragraph 4.85 that there were 2,203 people registered in the top priority bands (A to C) of the Council's housing register in April 2016<sup>43</sup>, with just under a further 1,000 people on the Joint Housing Needs Register needing to transfer to different sized affordable accommodation. These figures do not include many other households who may be in housing need but have not signed onto either of these registers.
- 6.2.5 The proposed affordable housing policy H2 seeks to meet objectively assessed needs for affordable housing, as set out on page 45 of the West Surrey Strategic Housing Market Assessment (SHMA): Guildford Addendum Report 2017<sup>44</sup>. This table shows a net need of 517 affordable homes<sup>45</sup> over the period of the Submission Local Plan from 2015 to 2034, after making a deduction of 407 for supply from existing stock (392 annual re-lets of social/affordable homes, plus 15 annual resales of intermediate homes):

**Table 24: Affordable Housing Need (per Annum)**

	This Addendum	2015 SHMA
<b>Current need</b>	60	66
<b>Newly forming households</b>	639	589
<b>Existing households falling into need</b>	225	209
<b>Total Need</b>	924	863
<b>Supply from existing stock</b>	407	385
<b>Net Need</b>	517	478

Source: 2011 Census/CoRe/Projection Modelling and affordability analysis

- 6.2.6 The Council is mindful of the fact that the Inspector has raised concerns with the departure from the Written Ministerial Statement in terms of seeking affordable housing contributions from smaller scale development (i.e. between 5 and 10 units),

<sup>41</sup> Affordability statistics for 2015 are referenced rather than later published statistics, as 2015 is the base date of the plan. This accords with the use of 2015 affordability data in response to Question 1 (Calculating the objectively assessed need for housing).

<sup>42</sup> Valuation Office Agency: Private rental market summary statistics:

<https://www.gov.uk/government/statistics/private-rental-market-summary-statistics-october-2015-to-september-2016> Data for statistics cross-referenced to footnotes 3 and 4 were published in Housing Advice Statistical Update 2017, Guildford Borough Council: [https://www.guildford.gov.uk/media/23481/Housing-Advice-Statistical-Update-2017/pdf/Housing\\_Advice\\_Statistical\\_Update\\_-2017.pdf](https://www.guildford.gov.uk/media/23481/Housing-Advice-Statistical-Update-2017/pdf/Housing_Advice_Statistical_Update_-2017.pdf)

<sup>43</sup> These are households with a housing need based on the 1996 Housing Act (as amended) as well as having a substantive and longstanding connection to the borough via family, residence or employment.

<sup>44</sup> Submission document ref. GBC-LPSS-SD-003.

<sup>45</sup> The 2017 SHMA Addendum notes that these figures should be treated with caution as they include supply-side factors and considers needs arising from not just newly arising but existing households, who if they moved would release a property for another households. The net need does not include concealed and homeless households who would require additional affordable housing.

even in the context of affordability issues. This matter is dealt with in more detail in response to the Inspector's Initial Question 14 and in paragraphs 36-48 below.

#### Affordable housing tenure split justification

- 6.2.7 The policy proposes an affordable housing tenure split from the Council's Housing Strategy 2015-2020 (pages 25 and 28)<sup>46</sup> of at least 70% affordable rent, with the remainder being other forms of intermediate housing such as shared ownership. This is based on the estimated housing need for types of affordable housing set out in the West Surrey SHMA (2015), which is very similar for the Guildford, Waverley and Woking local authority areas (Table 58, paragraph 8.23). The Council consider this an appropriate and evidence-based target.
- 6.2.8 Policy H2 (3) introduces flexibility by allowing for the tenure split to be revised in line with subsequent affordable housing needs evidence. The policy also includes a maximum level for affordable rent in line with the Housing Strategy or more recent housing guidance<sup>47</sup>.
- 6.2.9 Page 28 of the Housing Strategy explains the percentage affordable tenure split as follows:

*"Non-rented tenures such as shared ownership are linked to market prices, which are very high in this borough, so these tenures tend to only cater for a small proportion of the population (those who cannot afford to purchase outright, but who can get a mortgage and afford to purchase a share of an expensive property). Therefore, we aim to achieve as high a proportion of possible of rented affordable housing. 70 per cent takes into account the need for development to be viable and the desire for mixed communities, whilst providing the majority of new affordable housing as rented."*

#### Supplementary justification for lower affordable housing contribution threshold (5 or more units)

- 6.2.10 The Council's response to the Inspector's initial question 14 puts forward three main arguments in support of maintaining a lower unit threshold than advised in the WMS. These include:
- the increased number of affordable homes that are likely to be delivered (in the context of significant need); and
  - aspects related to timing of delivery, including that the retention of this threshold would likely deliver a number of affordable homes sooner (than relying on larger sites only, including strategic sites that deliver largely beyond the first five years of the plan period); and
  - the advantages in terms of wider spatial distribution of affordable homes across the borough (than would otherwise be the case)

---

<sup>46</sup> See <https://www.guildford.gov.uk/housingstrategy>

<sup>47</sup> Currently this is to be no higher than the maximum Local Housing Allowance – See page 66 of the Housing Strategy (2015).

These arguments are made in the context of viability evidence for a tested range of residential scheme typologies including five or more units (see below under ‘Affordable housing policies are effective and support delivery – viability evidence and ensuring sufficient flexibility’) as well as the flexibility that is offered by the Policy in varying tenure mix and provision of affordable homes<sup>48</sup>.

- 6.2.11 The following sections provide further detail on the estimated scale, timing and particularly spatial distribution of affordable homes that may come forward based on policy-aligned contributions from housing schemes of between 5 and 10 units. (see also the Council’s response to the Inspector’s Question 14).

*Estimated scale and timing of affordable housing from sites of between 5 and 10 dwellings*

- 6.2.12 In this regard, the table below<sup>49</sup> reflects the results of a simplified and approximate method of calculating the contribution to affordable housing supply, from 2017 LAA sites of between 5 and 10 dwellings contributing affordable homes at 40% of the gross number of homes. An estimated 38 affordable homes are anticipated to come forward during the first five years after the adoption of the local plan from these sites. An additional 60 affordable homes are estimated to come forward from these schemes over the remaining years of the plan period.

	Years 1-5 (2019/20 – 2023/24)	Years 6-10 (2024/25 – 2028/29)	Years 11-15 (2029/30 – 2033/34)
<b>Total homes on sites of 5-10 dwellings</b>	96	54	94
<b>Total affordable homes from these sites</b>	38	22	38

- 6.2.13 The projected supply figures above may be an underestimate, as they do not take account of projected future supply from windfall sites of between 5 and 10 dwellings. However, it could be argued that this might even out as some of the LAA sites either may not come forward or in limited instances may contribute homes at a lower number than the policy requirements.

- 6.2.14 Whilst the likely scale of delivery from sites of this scale may not be considered to be large, any contribution to affordable homes in the borough is regarded as important. As highlighted in the Council’s response to the Inspector’s Initial Question 14, the lower threshold would still deliver a greater overall number, which is important given the borough’s high affordable housing need. It would also secure earlier delivery of affordable homes by contributing to provision during the first five years of the plan before the large strategic allocations become effective. It is also possible that the

---

<sup>48</sup> See the Council’s response to Inspector’s Initial Question 16 (GBC-LPSS-002).

<sup>49</sup> Sites with planning permission were excluded from these figures (as the proposed new threshold would not have applied, and despite the fact that permissions may lapse and a new permission would may be subject to new affordable housing contribution thresholds) as were contributions from rural exception sites , as rural exception housing is by its nature affordable.

lower threshold would reduce ‘minimum threshold avoidance’, which is likely to be more common should the threshold for contributions be set at 11 units.

*Anticipated spatial distribution of affordable housing from sites of between 5 and 10 dwellings*

- 6.2.15 In line with the Council’s response to Question 14 of the Inspector’s Initial Questions further detail regarding the anticipated (wider) spatial distribution of affordable housing that would result from schemes of between 5 and 10 units is provided. The table below provides an indication of the location of sites on which these additional affordable units may come forward in the first five years after the plan is adopted. They are widely dispersed throughout the borough in rural as well as urban locations.

LAA site ref.	Local Plan allocation ref.	Location	Site address	Homes Years 1-5 (Gross)
1584	A20	Guildford Urban Area	Former Pond Meadow School, Pond Meadow, Guildford	10
58	n/a	Villages (land proposed to be inset from the Green Belt)	Land off Send Hill, Send	10
2177	n/a	Villages (land proposed to be inset from the Green Belt)	Land at Fangate Manor, St Martins Close, East Horsley	10
369	n/a	Within villages	Land at Grangefield, Jacobs Well, Guildford	6
917	n/a	Within villages	Garage, The Common, Horsham Road, Shalford	8
1006	n/a	Within villages	51, 53, 55 Summersbury Drive, Shalford	5
1017	n/a	Within villages	Land at Old Manor Gardens, Old Manor Gardens, Chilworth	6
1170	n/a	Guildford Urban Area	Dryden Court, Lower Edgeborough Road, Guildford	6
1265	n/a	Within villages	Land at Wisteria, Glaziers Lane, Normandy	7
1267	n/a	Within villages	Tangle Lea, New Road, Chilworth	5
1268	n/a	Within villages	Oakhaven, Webbers Post and Springfields, Clandon Road and Field Way, Send Marsh	7
2055	n/a	Within villages	Hurst House, High Street, Ripley	5
669	n/a	Guildford Urban Area	111 Epsom Road, Guildford	5
2371	n/a	Previously Developed Land in the Green Belt	Land north of Lower Road, Effingham	6

- 6.2.16 In the second and third five-year period locations for anticipated delivery also include the town centre, and Ash and Tongham urban area. Whilst some small schemes in rural areas may in practice be more likely to provide affordable housing off-site or as a financial contribution, the spatial and early delivery advantages of adopting the lower five-unit minimum contributions threshold are still considered to support justification for its retention the plan. In cases where it is genuinely necessary for a small scheme to provide a financial contribution in lieu of on-site provision the contribution can still be used to provide affordable housing on other sites in areas of the borough which may not otherwise become available for affordable housing.

6.2.17 Delivery of affordable homes from smaller sites is therefore considered important both in terms of overall amount provided and its geographical distribution. Many of these sites are infill locations within villages and could be considered more sustainable than alternatives in the green belt, which might only come forward otherwise as rural exception schemes. Furthermore, in some cases, sites are in areas where there are comparatively few larger sites available that may support affordable housing provision.

Affordable housing policies are effective and support delivery – viability evidence and ensuring sufficient flexibility

6.2.18 The Council submitted evidence on viability that considered its proposed affordable housing policy. This comprised the Local Plan and CIL Viability Study (2016) and Local Plan Viability Update (2017)<sup>50</sup>. In this regard, the viability of a range of housing typologies was tested based on the threshold in policy H2 (along with all other Local Plan policies with an impact on scheme viability).

6.2.19 The majority of (residential) scheme typologies remained viable when fully policy compliant. The responses to the Inspector's initial question 14 reflect further on this (see paragraphs 14.9 and 14.14) in relation to smaller sites of 5 – 10 units. In this light, the threshold of a 40% contribution to affordable housing on sites providing five or more homes, or sites of 0.17 ha or more regardless of the number of homes is considered to be justified and achievable.

6.2.20 The Council has included flexibility within policy H2 (at paragraph 4.2.40 of the Reasoned Justification to the policy) to vary either the tenure mix of the affordable housing or reduce affordable housing contributions for a proposed scheme, subject to a developer satisfactorily demonstrating that the scheme would be economically unviable with a 40% affordable housing contribution. This flexibility should ensure, in the unlikely scenario that the contribution requirement tips a proposed scheme with marginal viability into being unviable, that necessary adjustments can be made to ensure that all schemes are viable.

6.2.21 In line with the Inspector's Initial Question 16, the Council has proposed a draft modification, which would include these provisions under Policy H2<sup>51</sup>.

6.2.22 The flexibility in policy H2 accords with NPPF paragraph 50, which states that 'policies should be sufficiently flexible to take account of changing market conditions over time'. The NPPF states that a viability assessment may be necessary in such cases 'where the deliverability of the development may be compromised by the scale of planning obligations and other costs'<sup>52</sup>. The viability clause will be a material consideration in determining a planning application that is expected to provide affordable housing and is regarded as supporting the effectiveness of Policy H2 in

---

<sup>50</sup> See GBC-LPSS-SD-032 and GBC-LPSS-SD-031 respectively.

<sup>51</sup> See GBC-LPSS-002.

<sup>52</sup> Paragraph: 016 Reference ID: 10-016-20140306.

bringing forward affordable housing, whilst ensuring that there is sufficient flexibility, where appropriate.

Affordable housing policies are effective – securing timely delivery of on-/off-site contributions and payment in lieu

- 6.2.23 Policy H2(4) along with Paragraph 4.2.36 of the Submission Local Plan sets out the proposed approach in relation to securing off-site affordable housing or payment in lieu where the Council and a developer agree that on-site provision would be impractical due to the size or location of the development.
- 6.2.24 Taking account of the Inspector's concern over the wording of Policy H2 not being strong enough to secure the implementation of off-site affordable housing schemes within an appropriate timescale, the Council has proposed a draft modification to the policy. The proposed changes are reflected in the Council's response to the Inspector's Initial Question 15 (see GBC-LPSS-002).
- 6.2.25 With these changes the Council contends that this policy is robust in ensuring affordable housing is delivered and that this occurs in a timely manner when developed off-site.

**6.3 *The provision of accessible homes.***

- 6.3.1 The Council commissioned the SHMA Guildford Addendum<sup>53</sup> in 2017. It specifically considered the need for accessible homes (page 55 onwards). The findings were:
- 15% of all housing is designed to meet Building Regulations Parts M4(2) and M4(3) –two thirds of this to meet the needs of older people aged 75 plus. Of this 15% the breakdown is as follows:
    - 5% of new dwellings to meet wheelchair standards M4(3) of which 70% is provided as affordable and 30% as market housing; and
    - 10% of new dwellings are to be accessible and adaptable M4(2) of which 60% is provided as affordable and 40% as market housing.
- 6.3.2 Based on the SHMA Addendum's findings, Policy H1: Homes for All includes a requirement to provide 10% of new homes as accessible and adaptable and 5% as wheelchair used accessible homes on new residential development sites of over 25 homes. Within the reasoned justification (paragraph 4.2.11) the Council set out how good design, such as level thresholds, WCs at entry level and wide door openings can help make accommodation adaptable and wheelchair friendly.
- 6.3.3 The criteria set out in Policy H1 will assist in providing accommodation to help anyone with a long-term health problem or disability, and help homes be adaptable to meet the needs of the occupants as they grow older.

---

<sup>53</sup> Submission document ref. GBC-LPSS-SD-003.

#### **6.4 The provision of specialist accommodation.**

- 6.4.1 Specialist accommodation<sup>54</sup> can include many different types of accommodation that cater for people's specific needs. Within the reasoned justification of Policy H1 (paragraph 4.2.13 to 4.2.15) the Council set out that specialist accommodation includes hostels, homes for those in later life such as extra care housing, homes for those with disabilities and support needs and residential institutions.
- 6.4.2 The SHMA Guildford Addendum 2017<sup>55</sup> looked at what provision of specialist housing and care or nursing homes might be needed in Guildford borough (page 55-72). Within Guildford, there is estimated to be an increase of 5,652 people with a long term health problem or disability over the Local Plan period to 2034. The majority of this increase (87%) is expected to be in the over-65 age bracket (paragraph 6.7). A snapshot from the 2011 Census shows that 1,931 people identified themselves as long-term sick or disabled at the time of the Census.
- 6.4.3 The SHMA Guildford Addendum 2017 includes the housing needs of older people within its projections and calculations but excludes registered care housing; it identified a projected need for 1,061 units of specialist accommodation for older people over the period 2015-2034. These units form part of the overall assessed housing need. This specialist housing includes sheltered or extra care housing in C3 use class (page 71) and can include self-contained one or two bedroomed housing designed to attract newly retired older people (including those looking to downsize), and well-designed, adaptable and step-free accommodation which is wheelchair friendly. The West Surrey SHMA (2015) (page 143) estimates that about 70% of older person households would be able to afford a market solution for specialist housing.
- 6.4.4 In response to these findings the Council has:
- Provided a positively worded policy criteria that encourages the provision of well-designed specialist forms of accommodation (Policy H1 (4));
  - Required a percentage of accessible, adaptable or wheel chair user dwellings on residential developments of 25 homes or more (Policy H1 (3));
  - Specified site allocations which include specialist accommodation.
- 6.4.5 The reasoned justification for Policy H1 has a section on specialist accommodation (paragraphs 4.2.13 to 4.2.15). This sets out our understanding of specialist housing in greater detail and reinforces our approach that it should be well designed to ensure it is adaptable and wheelchair friendly.

---

<sup>54</sup> As set out in the Housing Type, Tenure Mix Topic Paper (page 15).

<sup>55</sup> Submission document ref. GBC-LPSS-SD-003.

- 6.4.6 The strategic site allocation policies that have specifically referenced the inclusion of specialist housing within the residential mix are as follows:

<b>Policy</b>	<b>Site</b>	<b>Allocation</b>
A25	Gosden Hill Farm	Mixed use development including 1,700 homes including some specialist housing, self-build plots and Gypsy and Traveller pitches
A26	Blackwell Farm	Mixed use development including 1,800 homes including some specialist housing, self-build plots and Gypsy and Traveller pitches
A35	Former Wisley Airfield	Mixed use development including homes including some specialist housing, self-build plots, sheltered/extra care homes and Gypsy and Traveller pitches

- 6.4.7 However, this does not preclude the inclusion of specialist housing on other allocated residential sites.

## **6.5 *The provision of student accommodation***

- 6.5.1 The Council has responded to the Inspector's initial question 7 regarding the Plan's approach to student housing (see GBC-LPSS-001, page 52-57). This response should be referred to and read in conjunction with the submission below.
- 6.5.2 The Council has sought to identify the need for student accommodation through looking at this issue in the West Surrey SHMA<sup>56</sup> (September 2015) (page 72 and Appendix C and errata) and as updated in the SHMA Guildford Addendum (2017)<sup>57</sup> (page 63 to 70).
- 6.5.3 The West Surrey SHMA Guildford addendum 2017 looks at how the Guildford student population might influence the need for both student accommodation and a wider housing need. It focuses on the growth of the largest student establishment in the borough, the University of Surrey, which is predicted to increase by 3,800 additional full-time Guildford-based students over the plan period.
- 6.5.4 The SHMA addendum estimates that assuming 55% of students will live in halls on campus (2090 students) then there would be an additional maximum need for up to 428 C3 dwellings (23 dwellings per year) for 1,710 students over the plan period to 2034. This is based on the assumption that there are 4 students per household. This separately identified student accommodation need for C3 dwellings is included within the borough's general housing need figures.

---

<sup>56</sup> Submission document ref. GBC-LPSS-SD-001.

<sup>57</sup> Submission document ref. GBC-LPSS-SD-003.

- 6.5.5 The Council has actively sought to ensure that the appropriate combination of student housing supply is provided for over the local plan period in order to meet need. It has done so through:
- engagement with the University of Surrey on the scale of Purpose Built Student Accommodation (PBSA) they can be expected to deliver on campus. This has occurred with due regard for their current provision of accommodation on campus (5,100 bedspaces), extant planning permissions (which are being implemented) and associated build out rates
  - planning for the reality that many students will continue to want to live off campus in market housing and consequently reflecting this as an uplift of 23 homes per year to its OAN (which will mitigate the impacts of student growth on the private housing market)
  - allocating appropriate sites in the Local Plan for student accommodation. These sites are:

<b>Policy</b>	<b>Site</b>	<b>Allocation</b>
A16	Land between Gill Avenue and Rosalind Franklin Close	450 homes and some student accommodation (bedspaces not specified)
A18	Land at Guildford College	200 student bedspaces <sup>58</sup>
A33	The University of Law	112 student bedspaces

- 6.5.6 These measures, in combination, are considered to provide an effective way to deliver accommodation to meet the future needs of students.

## **6.6 *Sites to meet the accommodation needs of Gypsies, Travellers and Travelling Showpeople***

- 6.6.1 The [Traveller Accommodation Assessment](#) (TAA) (June 2017)<sup>59</sup> sets out how many traveller pitches and plots the Council expect to need over the local plan period. This figure is based on interviews with our Traveller community and a desktop review. The findings show that 4 permanent pitches for Travellers and 4 permanent plots for Travelling Showpeople (as defined by Planning Policy for Traveller Sites (PPTS)) are required within Guildford borough between 2017 and 2034.
- 6.6.2 Whilst the Council is not required to set targets to meet the needs of Gypsies, Travellers and Travelling Showpeople who do not meet the PPTS planning definition, the Council is aware from the findings of the TAA that there is a need for 41 permanent pitches for Gypsies and Travellers and 4 permanent plots for Travelling Showpeople who do not meet the planning definition of traveller. There is also a likely need for 8 permanent pitches to meet potential additional need of households of

---

<sup>58</sup> A planning application for student accommodation (527 bedspaces) at Guildford College was refused planning permission on 3 November 2017 (ref:17/P/00509). An appeal was submitted on 6<sup>th</sup> February 2018.

<sup>59</sup> Submission document ref. GBC-LPSS-SD-005.

unknown planning status. The Council acknowledges this need and seeks to meet it where possible. Taking this approach recognises the need for culturally suitable accommodation for settled Gypsy and Traveller households who no longer meet the planning definition of travellers.

- 6.6.3 The Council has responded to the identified need for traveller accommodation by:
  - setting a target for traveller pitches and plots within Guildford borough between 2017 and 2034 in Policy S2 of the Submission Local Plan
  - having criteria in Policy H1(6) and (7) for traveller accommodation provision on large development sites
  - resisting the loss of existing pitches and plots,
  - allocating specific sites to meet the need identified.
- 6.6.4 Further details are set out in the Housing Type, Tenure and Mix Topic Paper and the Councils response to Q12 of the Inspectors initial questions.
- 6.6.5 The TAA has a total combined number of 53 pitches (4 pitches for PPTS travellers and 41 for non-PPTS travellers and 8 pitches for travellers of unknown planning status) and 8 plots (4 plots for PPTS travelling showpeople and 4 plots for non-PPTS traveller households). Within the Proposed Submission Local Plan the Council has allocated sites (whether travellers meet the planning definition or not) with a net increase of 59 pitches and 8 plots.

6.6.6 The allocated sites for pitches are:

<b>Policy</b>	<b>Site allocated for Gypsy and Traveller pitches</b>	<b>Allocation</b>
A25	Gosden Hill Farm, Merrow Lane, Guildford	8 public pitches
A24	Slyfield Area Regeneration Project, Guildford	6 public pitches
A26	Blackwell Farm, Hogs Back, Guildford	6 public pitches
A35	Former Wisley Airfield, Ockham	8 public pitches
A44	Land west of Winds Ridge and Send Hill	2 public pitches
A49	Palm House Nurseries, Normandy	6 private pitches
A51	Land at Cobbets Close, Worplesdon	3 public pitches (net)
A52	Four Acres Stables, Worplesdon	6 private pitches
A53	Roundoak, Wood Street Village	1 private pitch
A54	Lakeview, Ash Vale	3 private pitches (net)
A55	The Orchard, Puttenham	1 private pitch (net)
A56	Valley Park Equestrian, Shalford	5 private pitches
A57	The Paddocks, Ripley	4 private pitches
<b>Total</b>		<b>33 public pitches 26 private pitches 59 pitches in total</b>

6.6.7 The allocated sites for plots for Travelling Showpeople are:

<b>Policy</b>	<b>Site allocated for Travelling Showpeople Plots</b>	<b>Allocation</b>
A43	Land at Garlick's Arch, Send Marsh Burnt Common and Ripley	6 plots
A50	Whittles Drive, Normandy	14 (gross) plots, 2 (net) plots
<b>Total</b>		<b>8 private plots in total</b>

6.6.8 The number of sites allocated for pitches and plots are over and above the number identified by the TAA 2017. This provides flexibility should sites not come forward, or new guidance on assessing travellers accommodation needs emerge or new case law be established, particularly in regard to the definition of traveller. The criteria of Policy H1(7) that 'windfall' strategic development sites of over 500 homes provide traveller accommodation whilst there remains an identified need, gives further flexibility to adapt provision as necessary.

6.6.9 The Equalities Act 2010 requires Councils to take steps to meet the needs of people who have relevant protected characteristics, such as Romany Gypsies and Irish and Scottish Travellers. The Council have recognised this and taken a responsible approach that aims to address all travellers accommodation needs (for those households that meet the PPTS planning definition, those that do not and those of unknown planning status) by identifying sites to help meet their accommodation needs; this is considered to be a sound way forward.

## **6.7 *Houses in multiple occupation.***

- 6.7.1 The West Surrey SHMA<sup>60</sup> (2015) found that there are approximately 4,689 households within Guildford borough with non-dependent children (2011 Census). It states (page 154) that retaining young people in an area can assist in providing a more balanced demographic profile, support the local workforce and economy. However, young people find barriers to accessing housing given their typically lower income, unaffordability of home ownership and potential difficulties in securing mortgages and raising deposits and ineligibility for social housing. This contributes to the current trend of young people moving in with or continuing to live with their parents for longer. Providing houses in multiple occupation to a high standard will help younger people access housing on their own (SHMA page 162).
- 6.7.2 The Council recognises the demand for houses in multiple occupation and has taken the following steps to help get a higher standard of HMO's in the right locations.
- Proposed a policy approach in Policy H1 that supports applications<sup>61</sup> (for houses in multiple occupation for over six people) where the mix of houses and the local character will not be adversely affected, and where there is sufficient amenity space available.
  - The reasoned justification for Policy H1 in paragraphs 4.2.25 to 4.2.27 gives further details and explains how important it is to get the balance of housing types right in an area to ensure it remains a vibrant community and to maintain the character of the area.
  - In addition, although not a planning responsibility, the Council has established a HMO stakeholders' group to raise the standards and management of HMOs, and to reduce the impact on areas with high levels of HMOs. The Council has introduced a landlord accreditation scheme which promotes higher property and management standards by providing training to landlords and agents on their responsibilities. The Council has also published HMO [amenity standards](#) that are expected in houses in multiple occupation relating to room sizes, kitchen and bathroom facilities.

---

<sup>60</sup> Submission document ref. GBC-LPSS-SD-001.

<sup>61</sup> There are two types of houses in multiple occupation in planning terms; small HMOs housing between three and six people inclusive (which are classed as a "C4 Use") and large HMOs (which are classed as a sui generis use). Planning permission is not always needed for a house in multiple occupation; Permitted development rights allow a change of use of a house occupied by a single household or family (C3) to a house in multiple occupation for up to six people (C4).

6.7.3 Our planning policy approach will influence getting the right balance of housing types in an area and will work alongside the approach of our housing colleagues in issuing HMO licences and promoting accreditation to raise the standards of houses in multiple occupation.

#### **6.8 *Self-build and custom homes.***

- 6.8.1 The Council have responded to the Inspector's initial question 10 regarding the Plan's approach to self-build and custom homes (see GBC-LPSS-002, page 7- 9). This response should be referred to and read in conjunction with the submission below.
- 6.8.2 The West Surrey SHMA<sup>62</sup> (2015) reviewed self-build opportunities and information sourced from a website called Buildstore, and whilst there was a level of interest in June 2015 there were only six plots registered for sale within Guildford. The SHMA concludes that it would expect most new delivery to be on small windfall sites, although there is potential to designate plots within larger schemes.
- 6.8.3 Since the SHMA's findings in 2015 the Council has set up a register which provides a source of information on how much local demand there is for people wishing to build their own homes in our borough. There were approximately 87 individuals on the register in the first base period, and 109 individuals in the second base period. The Council intends to introduce local eligibility criteria and fees and we anticipate a drop in the number of eligible applicants on the register once the new criteria is introduced.

---

<sup>62</sup> Submission document ref. GBC-LPSS-SD-001.

- 6.8.4 Further details are set out in the Topic Paper and in the Council's response to the Inspectors initial questions, Q10. In summary, the Council has responded to the demand for Self-build and Custom Housebuilding by:
- Policy criteria in H1:
    - supporting proposed developments where there is no adverse effect on local character
    - requiring 5% of homes on development sites of over 100 homes to be for sale as self-build and custom housebuilding plots whilst there is an identified need.
  - Allocating sites in the Submission Local Plan as suitable for self-build and custom housebuilding plots as follows:

<b>Policy</b>	<b>Site suitable for Self Build and Custom housebuilding plots</b>
A22	Land north of Keens Lane
A25	Gosden Hill Farm
A26	Blackwell Farm
A29	Land to the south and east of Ash and Tongham
A32	Surrey Police Headquarters
A35	Former Wisley airfield
A38	Land to the west of West Horsley
A39	Land near Horsley railway station
A40	Land to the north of West Horsley
A43	Land at Garlicks Arch

## **6.9     *Rural exception sites***

### Summary

- 6.9.1 The Council has responded to the Inspector's initial questions 17 and 18 regarding the Plan's approach to rural exception homes (see GBC-LPSS-002, pages 21-23). These responses should be referred to and read in conjunction with the submission below.
- 6.9.2 The Council contends that the policy, considered together with modifications proposed, presents a sound basis upon which to permit appropriate rural exception schemes. It is furthermore considered effective in ensuring these scheme come forward, allowing appropriate flexibility, whilst also incorporating provisions to ensure that schemes remain affordable in perpetuity.

### Justification – meeting (rural) affordable housing need

- 6.9.3 The pressing need for affordable housing across the borough overall is referred to in the Council's response to Question 6.2 of the Matters and Issues – Part 1, as well as in its response to Question 14 of the Inspector's Initial Questions to the Council. Affordability is often a particular issue in rural parts of the borough, where house prices are often high, and where the availability of potential sites for housing is constrained by Green Belt policy in the adopted 2003 Local Plan.

- 6.9.4 The need for rural exception housing is further supported by evidence from local rural housing needs surveys, which are carried out on a regular basis in the borough, with a programme of between two and four surveys per year. These surveys are generally undertaken by the Rural Housing Enabler (employed by Surrey Community Action), but may also be carried out by parish councils or by developers, in liaison with the Council and Rural Housing Enabler and subject to their verification. The results of the most recent housing need surveys are summarised briefly below and indicate a need for rural exception housing in all parishes covered by the surveys.
- 6.9.5 Most of the borough's parishes have now had housing needs surveys carried out, although such surveys must be up-to-date if they are to be used in support of a planning application for rural exception housing. Page 71 of the Council's Housing Strategy (2015) lists the parishes that already have surveys and the dates when these were completed. Seven were undertaken since 2012-13 i.e. within the past five years, with an additional three prior to this but within the last ten years. Since publication of the Housing Strategy, the Rural Housing Enabler has published the results of housing needs surveys for the parishes of Puttenham (2014) and Worplesdon (2011). The Council has also received Housing Requirements Surveys (HRS) from parish councils for the parishes of Effingham (2014), West Clandon (2016) and Shalford (2016). These recent surveys show varying levels of need for rural exception housing but all indicate some level of need within the parishes that they cover.
- 6.9.6 As an example, the results of the survey for Worplesdon parish showed that 57 households were in need of affordable housing. Out of these, 17 would be suited for shared ownership, four would be suited for an affordable rented property, and 36 households would be more suited for rent below 80% of open market rental prices. There was also a good level of support from the community (71% of respondents in favour) to justify a local rural exception scheme.
- 6.9.7 The survey of Puttenham residents indicated a very limited need for affordable housing, whilst the Clandon survey showed a small level of need for just six affordable homes. The Effingham HRS however showed an interest in shared ownership properties from 72 households, with 54 households indicating interest in renting an affordable property from the Council or from a housing association<sup>63</sup>. Whilst the HRS for Shalford indicated a need for 12 affordable rented and 8 shared ownership homes.

#### Soundness: Consistency with National Policy, including addressing Gypsies and Travellers elements of the Policy

- 6.9.8 The Council contends that the rural exception homes Policy (H3) is sound. It is fully in accordance with the NPPF, which defines rural exception sites in its glossary, as "*small sites for affordable housing in perpetuity that would not normally be used for housing.*"

---

<sup>63</sup> The responses to the Effingham HRS included cases where households had ticked more than one housing option.

- 6.9.9 Furthermore, paragraph 89 of the NPPF advises that “*limited affordable housing for local community needs under policies set out in the Local Plan*” can constitute an exception to the construction of new buildings as being inappropriate in the Green Belt. By definition, this can therefore include rural exception schemes, which the NPPF definition states “*seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection.*” Paragraph 144 of the draft NPPF, which is currently undergoing consultation, makes this point even more specific, as it refers to “*limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites)*”
- 6.9.10 Policy H3 itself mentions the local connection requirement where it refers to meeting ‘identified local affordable housing needs’. It is also mentioned in paragraph 4.2.45 of the introduction to the policy and in paragraphs 4.2.49 – 4.2.49 of the Reasoned Justification.
- 6.9.11 The Council contend that its proposed modification in its response to the Inspector’s initial question 17<sup>64</sup> addresses concerns with the Policy. This would bring it into line with the Government’s *Planning Policy for Traveller Sites* (PPTS) with respect to travellers (as defined) sites being inappropriate development in the Green Belt<sup>65</sup>.
- 6.9.12 In this regard, Council has suggested amendments to Policy H3 (1) which aim to make clear that the rural exception policy for affordable accommodation includes Gypsies and Travellers who do not meet the Planning Policy for Traveller Sites (PPTS) definition of a traveller.
- 6.9.13 This will enable planning decisions to support the local needs of settled Gypsy and Travellers through affordable rural exception accommodation if they meet the terms of the policy as they apply to any other persons. This should avoid a potential exclusion where settled travellers are otherwise ineligible to apply for a pitch on a rural exception site and it is considered a sensible, fair and effective approach that accords with Government policy and the Council’s duties under the Equality Act 2010, which encompasses a wider definition than in the PPTS. The Council’s latest Traveller Accommodation Assessment (TAA) (June 2017)<sup>66</sup> indicates that there is a need for 41 permanent pitches for Gypsies and Travellers and 4 permanent plots for Travelling Showpeople who do not meet the planning definition of traveller. There is also a likely need for up to additional 8 permanent pitches to meet potential additional need from traveller households of unknown planning status in relation to whether they meet the PPTS definition.

---

<sup>64</sup> See GBC-LPSS-002.

<sup>65</sup> Planning Policy for Traveller Sites (2015), ISBN: 978-1-4098- 4670-3, paragraphs 16-17, page 5.

<sup>66</sup> Submission document ref. GBC-LPSS-SD-005

### Effective: supporting flexibility in order to deliver schemes

- 6.9.14 The viability clause at paragraph 4.2.52 – 4.2.53 of the Reasoned Justification to policy H3 aimed to allow a minimum number of market homes as part of a rural exception scheme .
- 6.9.15 In response to the Inspector's initial question 18, the Council have proposed to recommend a further modification to incorporate wording from these paragraphs into policy H3. The Policy (and new proposed wording) will contribute to support appropriate rural exception schemes coming forward in cases where viability might otherwise have been a challenge to delivery.
- 6.9.16 The conditions included in the proposed modification are regarded as an effective means of ensuring that no more market homes are included with a scheme than necessary to allow the scheme's implementation as well as addressing other potential areas of concern in relation to these types of schemes. For instance, to ensure that developers do not pay excessive amounts for the land, paragraph 4.2.53 states that the threshold land value will be limited to no more than ten times the agricultural land value at the time. Developers will need to demonstrate that their proposed scheme meets this condition by submission of a development appraisal. In the event of failure to reach agreement over the viability of a scheme, the proposal will be subject to independent assessment by external consultants, funded by the developer.

### Effective: securing rural exception homes as affordable in perpetuity

- 6.9.17 The policy is also effective in relation to securing affordable housing in perpetuity by ensuring that affordable housing on rural exception sites cannot be sold as open market housing.
- 6.9.18 The NPPF glossary states that rural exception schemes should remain affordable in perpetuity. Paragraph 4.2.47 of the Submission Local Plan, and the footnote to this paragraph, explain that the means of achieving this is in place in national legislation<sup>67</sup> for most rural areas of the borough, as the majority of rural parishes are designated as 'rural areas' under this legislation. Within these parishes, the maximum share of a shared ownership property that owners can buy from the housing provider must be restricted to no more than 80 per cent. Alternatively, the owner may sign a lease agreement that allows them to acquire up to 100 per cent but prevents later sale of the property on the open market by requiring that it be sold back to the provider.
- 6.9.19 Most 'bricks and mortar' affordable housing schemes in Guildford are now built by housing associations, or in some cases by private developers, rather than provided directly by the Council and therefore are no longer subject to the Right to Buy<sup>68</sup>.

<sup>67</sup>The Housing (Right to Acquire or Enfranchise) (Designated Rural Areas in the South East) Order 1997.

<sup>68</sup>Note that the last fully affordable housing schemes to be built directly by the Council were approved in 2012 at Lakeside Close, Ash Vale (62 affordable units, see application ref. 12/P/01005), New Road, Gomshall (12 net units, see application ref. 12/P/01268) and Wyke Avenue, Ash (5 units, see application ref. 12/P/01526). The Council retains ownership of these properties and it continues to

However, shared ownership properties in East Horsley and Send are not covered by the DPA legislation and may therefore be subject to the right to acquire. Paragraph 4.2.47 therefore makes it clear that protection must be in place to secure these properties permanently as affordable for future buyers. This protection could for example be in the form of a Section 106 agreement or lease agreement preventing the homeowner from staircasing to full ownership. S301 of the Housing and Regeneration Act 2008 made it possible for local authorities and housing associations to exercise this option.

---

own and manage over 5,300 rented and shared ownership properties in the borough under its Housing Revenue Account (HRA) Business Plan.

## **Question 7 - Meeting Employment Needs**

### Summary

- The plan is seeking to meet the need identified in the ELNA through the protection of existing sites and the allocation of new sites
- The plan with draft proposed modification (Question 28 of Initial Questions) seeks to support the expansion and intensification of Office and Research & Development (R&D) Strategic Employment Sites through not requiring the sequential test
- The plan with draft proposed modification (Question 28 of Initial Questions) seeks to support the expansion and intensification of sites in locations outside the town centre and Strategic Employment Sites through not requiring the sequential test where the increase in floorspace is limited to 25%
- The plan with draft proposed modification (Question 5 of Initial Questions) seeks to protect Strategic Employment Sites and Locally Significant Employment Sites in a manner commensurate with their status. To lose these sites would require additional sites to be allocated which are likely to be in sequentially less preferable locations.

### **7.1 Does the plan provide for an appropriate amount of land and floorspace for business purposes, and is the plan effective in its approach to new employment development? (See also Item 28 of my Initial Questions.)**

- 7.1.1 In relation to whether the plan is providing for an appropriate amount of land and floorspace for business purposes, this has been addressed by AECOM who prepared the Employment Land Needs Assessment 2017. AECOM has produced an Addendum that justifies the approach taken to assessing employment needs. This is included in Appendix 1. This concludes that the findings of the ELNA are considered to be a robust basis upon which to inform the plan.
- 7.1.2 In relation to whether the plan is effective in its approach to new employment development, this response should be read alongside the Council's response to Question 28: *Employment* of the Inspector's Initial Questions.
- 7.1.3 The plan has sought to meet the identified need for both industrial, and office and research & development as identified in the ELNA 2017. This is achieved through a combination of protecting key existing employment sites (discussed further below) and allocating a number of new employment sites.

### Industrial land

- 7.1.4 Industrial employment needs are principally being met as an extension to Slyfield Industrial Estate (A24), which is an existing Strategic Employment Site (SES), and a new SES at Burnt Common. Both sites benefit from good access to the strategic road network and are in locations on the edge of settlements where the effect on amenity value residential areas can be mitigated. The site at Burnt Common has potential additional land beyond that allocated within the plan. This provides future flexibility should it be demonstrated in a future ELNA that there is an increased industrial need or to compensate for the loss of another site. This is considered to be a robust approach given the difficulties in finding suitable and available industrial land

- 7.1.5 A small amount of industrial land is also being provided as part of the new settlement at the former Wisley airfield (Site A35) as part of a residential-led mixed use scheme.

### Office and Research & Development

- 7.1.6 The need for office and R&D is being met partly through the expansion of two existing SES. The first is a significant expansion of the Surrey Research Park which is discussed in more detail in the Council's response to *Question 11.18* of the Inspector's Matter and Issues. The opportunity to extend this site will enable the Council to build on its knowledge-based employment sector that is of regional significance. The Surrey Research Park is aligned with the key priorities identified by the Enterprise M3 Local Enterprise Partnership (LEP). The LEP's Strategic Economic Plan identifies Guildford as one of four growth towns which are key to driving economic growth across the Enterprise M3 area, and its objectives of being a 'Sci:Tech Corridor'.
- 7.1.7 The second SES which is proposed to be inset from the Green Belt in order to enable expansion and intensification is the Send Business Centre/Tannery Studios. Send Business Centre provides serviced and managed office space for long or short term hire, designed for knowledge economy and creative start-ups, ranging from music producers through to computer game developers. Part of their unique offer is very high-speed fibre optic resilient internet. Send Business Centre is supplied by two geographically resilient exclusive fibre pipelines scalable to 10GB. This means it is one of the fastest and best-connected broadband sites outside of the City of London for short-term rented office space. Send Business Centre and Tannery Studios have also been supported by the Enterprise M3 LEP through their infrastructure funding.
- 7.1.8 Finally, a new SES is proposed as part of the other strategic Guildford urban extension at Gosden Hill (Site A25). This site is providing a new headquarters office to the north of the site near the A3, with access to both the proposed new Park & Ride, rail station and Sustainable Movement Corridor.
- 7.1.9 The NPPF<sup>69</sup> requires a sequential test for new Office & R&D floorspace whereby it should be directed where possible to town centre locations prior to the consideration of edge of or out of town locations. A draft modification is proposed as part of the Council's response to *Question 28* of the Inspector's Initial Questions, which provides additional flexibility in this regard by removing the distinction between the town centre and B1(a) and B1(b) SES. This supports the future expansion and intensification of Office and R&D SES without needing to first demonstrate that there are no sequentially preferable sites in the town centre.
- 7.1.10 Significant new floorspace should continue to be directed to these sustainable locations which reduce the need to travel by the private car and encourage modes of sustainable transport. Nevertheless, in order to address the Inspector's concerns the Council considers that new employment floorspace that is limited in scale, which would not generate a significant numbers of new employees and additional vehicle movements, could help support the local economy and therefore may be considered appropriate outside the town centre and SES.
- 7.1.11 A further draft modification is proposed that removes the limit of 200 sq m and enable offices outside the town centre and SES to expand by up to 25%. The Council

---

<sup>69</sup> NPPF, paragraph 24.

considers that enabling expansion by up to 25% provides sufficient flexibility to businesses and does not place an unacceptable impediment on their growth. However, the Council considers that growth exceeding 25% could give rise to a significant increase in unsustainable movement patterns and should continue to be considered inappropriate and therefore tested by policy.

## **7.2 *Is the plan justified in the extent to which it protects employment land and floorspace?***

- 7.2.1 This response needs to be read alongside the Council's response to *Question 5: The balance of land uses* of the Inspector's Initial Questions.
- 7.2.2 The Submission Local Plan designates both Industrial, and Office and R&D Strategic Employment Sites (SES) and Locally Significant Employment Sites (LSES). These are the Council's most important employment sites and have been assessed in the ELNA for their suitability to support office/R&D/industrial/distribution/storage uses. In accordance with Policy E3, these sites will be subject to a defined period of active marketing (two years and 18 months respectively) and evidence of a consideration of other employment generating uses prior to accepting the loss of these sites to residential uses.
- 7.2.3 The retention of these important employment sites is necessary given the scale of employment needs identified over the plan period. Further employment land is necessary in order to meet this need and for this reason the Council considers it imperative that existing sites which fulfil an important economic role are not lost to other uses as this would result in even more new employment provision to be identified which are likely to be in less sequentially preferable locations. A draft modification is proposed in *Question 5: The balance of land uses* which no longer requires the consideration of other employment generating uses on non-designated employment sites following the 12-month period of active marketing.
- 7.2.4 Whilst the Council supports increased housing development within the town centre given the sustainability of this location and the opportunity for increased densities, it does not consider that this should come at the expense of high trip generating uses. The town centre and other highly accessible sites offer increased options for the use of public transport. These sites are relatively rare so to maximise their role they should be used for high trip generating uses such as employment and retail. This enables not only transport choice but also linked trips, which reduce the need to travel. To lose these opportunities by providing solely residential units is not considered to be a long term sustainable approach. Mixed-use development including a residential element can help maximise the development opportunities on a site and provide accessible residential units which support the vitality and viability of town centres, provide natural surveillance and support the night-time economy. Residential development should be in addition to and not instead of high trip generating uses. This approach is consistent with emerging Government policy in relation to increasing the density in town centres.

## **Appendix 7.1: Addendum Response to Q7.1**

## **Guildford Local Plan Employment Land Addendum**

### **(prepared by AECOM for Guildford Borough Council, May 2018) Response to Inspector's Questions, Matters and Issues for Examination in Public**

***Question: 7.1 Does the plan provide for an appropriate amount of land and floorspace for business purposes?***

#### **Response**

The response below draws on the Employment Land Needs Assessment (ELNA) produced by AECOM September 2017 for Guildford Borough Council, as a key evidence base document which informs the Submission Local Plan policies.

Broadly, the ELNA involved two components: 1) An assessment of the current supply and supply pipeline of employment land / floorspace; 2) An assessment of demand for employment land / floorspace.

Below we highlight how the supply and demand methodology applied in the ELNA follow national guidance and best practice and, drawing on the best available information, provide a basis for robust policy making.

1) An assessment of the current supply and supply pipeline of employment land / floorspace: The ELNA assessed the existing supply conditions in terms of location, quantity and quality of employment land / floorspace provision in the borough. Sites to be assessed were identified upon relevant documents and up to date information:

- The Guildford borough Employment Land Assessment (July 2013), which identified strategic sites that provide over 100 jobs and are greater than 0.25ha;
- The Guildford Borough Strategic Housing Land Availability Assessment (June 2014 Update) which identified non-strategic sites over 0.25ha; and
- Analysis by the Council of business rates registry to identify smaller other non-strategic sites which provide at least 500sqm of B-use class floorspace.

Together this provided a complete picture of existing supply across the borough, capturing larger and smaller sites and designated and non-designated sites. In total 20 strategic sites (measuring 172ha in total) and 24 non-strategic sites (10ha in total) were identified. The methodology and criteria used to assess a site's suitability to support office/R&D/industrial/distribution/storage uses was based on the latest guidance and good practice including the NPPF (2012), the PPG (2014) and the OPDM's Employment Land Review Guidance Note (2004), which though withdrawn still provides useful pointers and directions on assessing supply. Each site was assessed consistently in terms of key criteria which reflect site suitability, business need and location decision making: impact on surrounding amenity; access to strategic road network; access to public transport; servicing of businesses; parking; access to amenities and facilities; quality of environment/public realm; and levels of observed / recorded vacancy. Information to inform the assessment of sites was gathered by the Council via site visits, inputs by the Council's planning and development control departments, and desk-based research carried out by AECOM.

To complete the supply assessment the pipeline was provided by the Council, covering sites or premises where planning permission for new development or a change of use had been granted but not yet started, or where work has started but not completed. These proposals have the potential to change the quantity, quality and location of provision, which may impact on local businesses and investment decisions. However, planning permissions and prior approvals may not come forward and as such were not discounted from the calculated net additional land/floorspace requirement forecast over the Local Plan period.

The supply side assessment was thorough and of a level of detail suitable to inform policy development.

2) An assessment of long-term demand for employment land / floorspace

ELNA estimates the amount of additional B use class floorspace or land required in the borough between 2016 and 2034. The forecasting synthesises historic trends in floorspace provision and employment change with macro-economic forecasts to estimate the unknown future projected floorspace/land change.

The approach to estimate the future demand for B-use class floorspace was to:

- Determine the suitable property market area (PMA) for Guildford borough from which to draw input data
- Assess past trends in floorspace using Valuation Office Agency (VOA) data and employment using Annual Business Inquiry and Business Register Employment Survey data (provided by the Office of National Statistics, ONS)
- Assess projections in office/R&D and industrial/storage employment and future floorspace demand projections drawing on independent macro-economic forecasts
- Synthesise past trends and future projections to forecast demand for employment floorspace and land across the PMA, taking into account as appropriate local factors including the local property market and socio-economic context; and
- Produce a borough-wide forecast taking into account demand for land by users of industrial/storage land.

The demand assessment was situated within an understanding of how the wider PMA for office/R&D and industrial/storage uses has and is expected to perform. The PMA was identified through consultation with commercial agents and the existing evidence base, including the Guildford and West Surrey SHMA, and corresponds to areas which map within the boroughs of Guildford, Woking and Waverley. The PMA is judged to provide a more suitable level of geography to assess long term demand for business space.

Three independently derived projections of future workplace employment were used to forecast employment change over the period 2016-2034:

- Cambridge Econometrics Employment Projections, 2016 (Cambridge Econometrics);
- UK Local Market Forecasts, 2016 (Experian); and
- Local Authority District Forecasting Model, 2016 (Oxford Economics).

While each provider applies a different method to project future workplace employment, from a review of these technical reports and based on our professional experience, AECOM assessed each of these forecasts to be robust and suitable for projecting change over the long term in Guildford borough.

Assuming that these three datasets present a fair representation of the employment change over the long term, future workplace employment is expected to fall somewhere within the range of the estimates provided by the three forecasts. The average (mean) of all three forecasts was taken to represent future employment growth.

In addition, a number of local factors, which could potentially affect the projected rate of employment land / floorspace growth, were identified and considered including the strength of the local office property market relative to the wider PMA; changing employment densities; and the strength of the local industrial and distribution/storage market relative to the wider PMA.

When calculating the net additional demand other land requirements were factored in: the area requirement for waste management and recycling facilities, which tend to occupy land suitable for industrial/storage uses, any surplus vacant and developable land, and optimal vacancy levels to support the effective operation of the property market (for instance allowing businesses to relocate within the PMA in response to growth or contraction).

The demand assessment applies a logical and robust method to estimating long term demand for employment space. A key benefit is how past observed trends and future expected trends in data are synthesised: the historic B use class employment and floorspace data is assessed over more than one business cycle, and the projected employment is based on long term sector trends which capture multiple business cycles (time of growth and

contraction). The long term repositioning of the economy at a PMA level and changes in the nature of businesses operations, supply chain networks and customer base, work practices, consumer purchasing and demographic change are therefore implicitly captured within the projection of employment land / floorspace demand. As such the demand forecast applied captures more complex influences than any simple projection of demand using single variables, for example, population change / labour supply or property trends.

The forecast net additional demand for employment floorspace/land as set out in the Employment Land Needs Assessment (ELNA) for the period 2016-2034 of 36,100sqm to 43,700sqm for office/R&D floorspace and 3.7ha to 4.1ha for industrial/storage land is therefore judged to be a suitable basis to inform policy development.

## **Question 8 – Retail and Service Centres**

8 Please note: this response should be read alongside the Council's responses to Items 5, 6 and 31 of the Inspector's Initial Questions.

**8.1 *Is the plan's approach towards Guildford Town Centre realistic and effective having regard to changing retail patterns? (see also Items 5, 6 and 31 of my Initial Questions.)***

### Summary

8.1.1 The Council contends that its evidence base, for example the 2017, Guildford Retail and Leisure Study Addendum (RLSA) (2017)<sup>70</sup>, and Retail and Leisure Update Study (2014)<sup>71</sup> provides a realistic and relevant basis for the Local Plan's approach toward Guildford Town Centre, and specifically in relation to retail uses, as is set out in Policy E7 of the Plan. The evidence reflects due consideration of the influence of changing retail patterns on retail need figures for Guildford, including the impact of the downturn in the economy since 2007 and the growth of Special Forms of Trading (SFT) including internet (multi-channel) retailing. This evidence base has been confirmed as a sound basis upon which to continue to plan for accommodation of retail need<sup>72</sup>.

8.1.2 In this regard, the Plan's allocation of 41,000 sq m additional (gross) comparison goods floorspace in the Town Centre is considered appropriate. To ensure soundness, the Local Plan seeks to meet its retail needs to 2030, with a preference for town centre sites, to ensure the continued vitality of the Town Centre in line with the NPPF<sup>73</sup>. The potential for North Street (site allocation A6) to accommodate the majority of these needs is considered appropriate<sup>74</sup>. Furthermore, additional flexibility has been proposed to be built into this site allocation policy through a draft modification, which seeks to ensure that the amount of retail floorspace required considers the most up to date retail evidence at the time the proposal comes forward<sup>75</sup>.

8.1.3 The Council thus contends that the balance of uses that the Local Plan proposes for the Guildford Town Centre, including provision for main town centre uses such as retail development along with housing and other uses is the most sustainable approach and is supported by its evidence.

8.1.4 Note that the responses to this question and question 8.2 below should both be read alongside the Council's responses to Questions 5, 6 and 31 of the Inspector's Initial Questions to the Council.

---

<sup>70</sup> Submission document ref. GBC-LPSS-SD010.

<sup>71</sup> Submission document ref. GBC-LPSS-SD-009.

<sup>72</sup> see paragraph 5 and Question 8: Appendix 1 of this response.

<sup>73</sup> see NPPF, paragraph 23.

<sup>74</sup> See Council's response to the Inspector's Initial Question 31 (GBC-LPSS-002).

<sup>75</sup> See Council's response to the Inspector's Initial Question 6 (GBC-LPSS-001).

## Evidence base

- 8.1.5 The Council is mindful of claims that the amount of retail floorspace allocated in the Local Plan is excessive considering changing trends, including the impact of internet sales. The Council is, however, confident in the evidence base, which supports its approach to (and extent of) retail provision in the Town Centre. Changing retail patterns have been specifically addressed and considered.
- 8.1.6 In support of the Local Plan approach, the evidence indicates that:
- There remains significant capacity to support new comparison goods floorspace over the plan period in Guildford borough. Assessed gross floorspace capacity for comparison goods in Guildford Town Centre is indicated at 38,142 sq m by 2030<sup>76</sup>.
  - Growth in the forecast need for retail floorspace remains in spite of the 16.2% increase in Internet sales since 2015<sup>77</sup> and projections of future increases. The retail and leisure capacity forecasts in the 2017 Retail and Leisure Study Addendum<sup>78</sup> (RLSA) took account of the shift in retail patterns nationally and the local impact for Guildford of changing spending habits of consumers, including the increase in Internet trading. In this regard, the RLSA made a robust allowance for the growth in Special Forms of Trading (SFT), which includes Internet trading, for comparison goods over the study period from 9.4% in 2015 to 12.9% between 2016 and 2036, and from 1.3% to 2.3% for convenience goods over the same period<sup>79</sup>;
  - Footfall across Guildford Town Centre increased in Q1 of 2018, with a reported increase in January 2018 of 9.9% year on year; this compared favourably to a 4% decline in footfall across the South East as a whole and a 3.1% decline across the UK in the same period<sup>80</sup>
  - Guildford Town Centre is among the top shopping destinations outside central London, in addition to being the most popular retail centre in Surrey. This places Guildford Town Centre under less pressure than other centres to diversify its retail and leisure offer to continue to attract visitors.
- 8.1.7 Subsequent to publishing this evidence, the Council has sought advice from its consultants, Carter Jonas, regarding its continued veracity as a sound basis for the purposes of the Local Plan and provision for retail uses. In this regard, whilst certain data publications upon which the 2017 RLSA was based have been superseded with

---

<sup>76</sup> Note that the 2014 Retail and Leisure Study and 2017 RLSA took account of committed comparison and convenience floorspace; i.e. main planning permissions within their floorspace capacity analyses. See paras. 7.42-7.43 of 2014 study and Appendix 7 of 2017 study. The turnover of these stores (calculated using sales densities, i.e. taking account of type and size of store) was therefore deducted from estimated overall available expenditure to arrive at the total floorspace capacity forecasts.

<sup>77</sup> See 2017 RLSA, Appendix 10, para. 1.8.

<sup>78</sup> Submission document reference no. GBC-LPSS-SD-009.

<sup>79</sup> See 20127 RLSA, paragraph 2.16.

<sup>80</sup> Springboard Footfall Counts, January 2018:

[http://experienceguildford.co.uk/media\\_files/file/January%202018.pdf](http://experienceguildford.co.uk/media_files/file/January%202018.pdf)

a more recent data release, the changes to the population and economic variables are unlikely to be great enough to have a notable impact on forecast capacity identified in the 2017 RLSA. Therefore, forecasts for convenience retail, comparison retail, and food and beverage floorspace remain valid (see Appendix 8.1: Addendum Response to Q8.1).

- 8.1.8 The Council thus consider that the retail need figures as reflected in the 2017 RLSA continue to be an appropriate basis upon which to plan.
- 8.1.9 It is acknowledged though that retail needs may change in the future and that long-term capacity forecasting, particularly beyond ten years is difficult, principally due to the impact of economic, demographic and market trends on longer-term assumptions and forecasts<sup>81</sup>. This is similarly reinforced by the consultation proposals on the proposed update to the NPPF, which highlights the difficulty in forecasting for retail needs beyond ten years<sup>82</sup>. The 2017 RLSA also advises caution in relation to all capacity forecasts beyond a five-year period, though supporting the fact that account should be taken of forecast growth over the longer term. The allocations for retail floorspace in the Submission Local Plan therefore take into account the indicated requirement to 2030, rather than to the end of the Local Plan period.
- 8.1.10 To ensure that changing market trends are considered during the plan period, the Council are of the view that the (five-year) review period for the Local Plan would offer an opportunity to ensure that the provision of retail floorspace in the Plan remains justified. If necessary Local Plan provisions could be adjusted to accommodate changes in retail need as a result of such a review.

#### The choice of North Street and proposed flexibility

- 8.1.11 The Council provided justification for the inclusion of this site allocation and its proposed balance of allocated uses within its response to Question 6 of the Inspector's Initial Questions<sup>83</sup>. Considering the potential for market fluctuation, flexibility has been proposed to be built into the Plan in terms of the North Street allocation for comparison retail floorspace. This would allow for variation in the quantum of retail floorspace provided based on future updates to the Guildford Retail and Leisure studies<sup>84</sup>. These updates may be undertaken should the circumstances justify such work. Furthermore, the Council proposes to change the amount of floorspace to an approximate, rather than a minimum figure, which is intended to support greater flexibility.

#### Alternative approaches which do not meet retail need in the Town Centre are not considered sustainable

- 8.1.12 It is important that retail needs are met in order to have a sound Local Plan<sup>85</sup> and that these needs are met in sustainable locations and the Plan's retail site allocations

<sup>81</sup> See 2017 RLSA, paragraph 1.5.

<sup>82</sup> See NPPF Consultation proposals, page 15 (March 2018) Ref: ISBN 978-1-4098-5206-3.

<sup>83</sup> Submission document ref. GBC-LPSS-002.

<sup>84</sup> As per Council's response to Inspector's Initial Question no 6 (see GBC-LPSS-001).

<sup>85</sup> See NPPF, paragraph 23, bullet 6.

have therefore ensured the achievement of this goal. The Town Centre is critical in this regard. The Council's approach has focused future retail development in this location, which is consistent with the NPPG and the adoption of a town centre first approach in seeking to meet retail needs.

- 8.1.13 In support of this approach the Council recognises that the Town Centre offers increased options for the use of public transport and uses generating a high number of trips (e.g. major retail development) are best focussed in this location. This enables not only transport choice, but also linked trips, which reduces the need to travel.
- 8.1.14 Sites to accommodate significant retail development are relatively rare in the Town Centre<sup>86</sup>, reinforcing the appropriateness of the choice of North Street to accommodate these types of uses at the scale proposed. This is considered preferable to allocating this scale of main town centre use to less sustainable locations outside the Town Centre. To lose these opportunities by providing solely residential units is not considered to be a sustainable approach.
- 8.1.15 This is not to detract from the appropriateness and benefits of brownfield residential development or mixed use schemes, which provide homes in the Town Centre. However, residential development should be in addition to and not instead of high trip generating uses such as retail.

---

<sup>86</sup> See the sequential assessment at Appendix B of the Council's Topic Paper: Retail and Town Centres (2017) (GBC-LPSS-SD-TP-006)

## **8.2 Is the plan's approach to changes of use in all centres justified on the evidence and necessary?**

### Summary

- 8.2.1 The Plan's approach to changes of use is in accordance with the National Planning Policy Framework's advice to promote competitive, vibrant and attractive retail centres (paragraph 23). It is also justified by evidence of continued strong economic performance of the borough's town, district and local centres, as shown by continued low vacancy rates in these centres and supported by evidence presented in the 2017 Retail and Leisure Study Addendum (RLSA) of strong demand for new comparison retail floorspace over the 2015-2034 period of the Submission Local Plan. This is particularly the case in Guildford Town Centre, where the latest review of retailer requirements indicates interest from a number of major high street brands in developing new comparison retail floorspace.
- 8.2.2 The Council's strategic decision to restrict non-retail ground floor uses in district and local centres under the new Local Plan policies E8 and E9 to units in the A use class and to main town centre uses with a shopfront is justified in the Council's view by this evidence of strong economic performance and on the continued forecast need for retail floorspace. Greater diversity of uses is however encouraged in secondary frontages and within district centres, as recommended by the NPPF. Shops in local centres and in isolated locations that provide for everyday shopping needs are protected under proposed policy E9, as they reduce the need for people to travel for shopping and provide valuable social as well as economic functions. Paragraph 70 of the NPPF supports this aspect of the policy.
- 8.2.3 The Council has reviewed the shopping frontages in the adopted 2003 Local Plan and made a recommendation to update these, as a further modification to the Submission Local Plan, to ensure that they are appropriate and continue to operate effectively across the whole of the Town Centre. The plan's retail policies will continue to be monitored regularly, as recommended by the National Planning Practice Guidance. The policies may also be updated again as part of a review of the Local Plan<sup>87</sup> to take account of market signals or in the light of updated retail evidence (for example, future retail surveys and updated retail and leisure studies) and changes to national planning guidance).

### Justification for the Council's approach

#### *Alignment with the National Planning Policy Framework (NPPF)*

---

<sup>87</sup> Changes to the Town and Country Planning (Local Planning) (England) Regulations 2012 which came into force on 6 April 2018, require local planning authorities to review their local plans every five years from adoption.

- 8.2.4 Policies E7, E8 and E9 set out the Council's policy approach to changes of use in town, district and local centres. For the Council's rationale for its wording of these policies, see below in this response under the subheading '*Restriction of non-A1 retail units in town, district and local centres*'.
- 8.2.5 The Council's response to Question 31 of the Inspector's Initial Questions referred to the NPPF's requirement at paragraph 23, bullet 3, for local planning authorities to set a clear definition of primary and secondary frontages in order to help establish the extent of their primary shopping area. The Government's proposed wording for the draft NPPF at paragraph 86(b) states a similarly worded requirement. The proposed retail policies in the Submission Local Plan seek to promote competitive, vibrant and attractive retail centres, in accordance with the NPPF paragraph 23 (see paragraph 2.15 of the Housing Types, Tenure and Mix Topic Paper (2017)). Shopping frontages play an important economic role in maintaining a central core of shopping uses and preventing dispersal of existing retail units, which would weaken the shopping function of these areas and make it harder to resist applications for conversion of remaining retail units to residential or other non-retail uses. They also ensure that these areas remain economically competitive, vibrant, and attractive to visitors.
- 8.2.6 The Council maintains that the approach in policies E7, E8 and E9 of protecting against loss of A1 retail units in centres is both in line with national policy, and justified by the evidence of strong economic performance of the borough's town, district and local centres (for example the history of low vacancy rates in these centres). Further justification is provided by the evidence of need for additional retail floorspace within the town centre and across the whole borough presented in the Council's retail and leisure studies, which is highlighted below under the subheading '*Retail evidence*'.

*Retail evidence: continued forecast need for retail floorspace*

- 8.2.7 As the Council highlighted in its response to Question 31 of the Inspector's Initial Questions, Guildford Town Centre is a highly successful destination for retail shopping, ranked 11 in the top 500 British retail centres for vitality in 2014 and second among the top five centres in the South East, after the Bluewater centre in Stone, Kent<sup>88</sup>. It ranked 29 in the Javelin VenueScore centre 2016 rankings. The 2017 Retail and Leisure Study Addendum<sup>89</sup> (RLSA) showed considerable borough-wide capacity and capacity in the town centre for new comparison retail floorspace over the 2015-2034 period of the Submission Local Plan, with a steady increase towards the end of this period (total of 38,142 sq. m in the town centre by 2030 and 43,645 sq. m by 2034)<sup>90</sup>. It notes that in spite of the 16.2% increase in Internet sales

---

<sup>88</sup> Source: <http://www.costar.co.uk/en/assets/news/2014/October/The-UKs-most-and-least-vital-retail-centres/>.

<sup>89</sup> Submission document reference no. GBC-LPSS-SD-009.

<sup>90</sup> Note that the 2014 Retail and Leisure Study and 2017 RLSA took account of committed comparison and convenience floorspace; i.e. main planning permissions within their floorspace capacity analyses. See paras. 7.42-7.43 of 2014 study and Appendix 7 of 2017 study. The turnover of these stores (calculated using sales densities, i.e. taking account of type and size of store) was

in the town centre since 2015<sup>91</sup>, many multiple and traditional high street retailers are actively seeking larger format stores<sup>92</sup>. Demand from food and beverage operators for floorspace is similarly healthy, with a projected capacity of 15%-20% of the comparison floorspace indicated for these uses (7,000 to 9,333 sq. m gross across the borough by 2034). The Council commissioned Carter Jonas, the consultant that prepared the 2017 RLSA was commissioned in May 2018 to check on the continued validity of the retail and leisure capacity forecasts in the document and the outcome of their research is appended to this response at Appendix 1 (Addendum Response to Q8.1). Their updated review of retailed requirements shows demand from 48 retailers for floorspace in Guildford Town Centre, with a combined gross requirement for 20,350 sq. m. of A1 floorspace. This includes demand for larger format floorspace from major high street brands such as Lidl, Wilko, Poundworld and The Cotswold Company (see Appendix 1).

*Retail evidence: low vacancy rates*

- 8.2.8 The vacancy rate of commercial units in town, district and local centres and any recent changes in this is another indicator of their economic performance and, by extension, provides validity for the current policy approach of restricting loss of A1 retail units in these areas. The Council's surveys of commercial units<sup>93</sup> in Guildford town centre in May 2017 showed that only two of the 67 units in the primary shopping frontages were vacant, which equates to a very low vacancy rate of 2.9%. Furthermore, this rate had fallen from 4.3% in May 2015. Of the 58 units in the primary frontage that were in A1 use in May 2017, only one of these was vacant, which equates to just 1.7% of the total A1 units.
- 8.2.9 Across the whole of the PSA<sup>94</sup>, the vacancy rate in May 2017 was 6.9%. Measured against the previous two years, this rate had fallen each year<sup>95</sup>. It is now considerably below the national average vacancy rate for town centres, which was 9.4% in January 2017<sup>96</sup>. These are strong indicators of the success of the town centre's retail market. In the secondary frontages, just 6.7% of the commercial units surveyed were vacant in May 2017, not including units removed or under construction<sup>97</sup>, and this had remained unchanged from the time of the previous survey in November 2016. Of the 199 units in the secondary frontage that were in A1 use in May 2017, nine of these were vacant, which equals a vacancy rate of 4.5%.

---

therefore deducted from estimated overall available expenditure to arrive at the total floorspace capacity forecasts.

<sup>91</sup> See 2017 RLSA, Appendix 10, para. 1.8.

<sup>92</sup> 2017 RLSA, Appendix 10, para. 1.29.

<sup>93</sup> Source: Monitoring data from retail surveys (unpublished), Guildford Borough Council

<sup>94</sup> This included units within the existing tertiary and specialist frontages, as well primary and secondary frontages.

<sup>95</sup> The vacancy rate across the entire town centre fell from 8.9% in May 2015 and 7.3% in November 2016.

<sup>96</sup> Source: BRC Springboard Footfall and Vacancies Monitor: <https://brc.org.uk/news/2017/vacancy-rate-remains-stable-though-footfall-decline-deepens>.

<sup>97</sup> This calculation excluded the 25 vacant units that had been vacated to enable the redevelopment of Tunsgate Square shopping centre, which were under construction at the time of the survey in May 2017.

8.2.10 The borough's two (three proposed) districts and 20 (21 proposed) local centres have experienced low to zero vacancy rates in previous years. The Council's latest retail surveys show that in Wharf Road, Ash district centre in 2017 there was only one vacant unit out of 33 commercial units, which equates to a 3% vacancy rate. This was an improvement from two vacant units in 2015 (6% vacant). The commercial units in Station Parade, East Horsley district centre were 100% occupied in 2017 (an improvement from one vacant unit in 2015, i.e. 3% vacant). In Ripley, which the Council last surveyed in 2015, there was only one vacant unit out of 67 (1.5% vacant). This had also improved since the previous (2014) survey, when there were two vacant units (3% vacant).

*Restriction of non-A1 retail units in town, district and local centres*

- 8.2.11 In policy E7, the Council took the strategic policy decision to continue to protect against loss of A1 uses in primary shopping frontages (as it does currently under adopted Local Plan policy S4). It also took the strategic decision to restrict non-retail ground floor uses in district and local centres under the new Local Plan policies E8 and E9 to units in the A use class and to main town centre uses with a shopfront. These policy decisions are justified in the Council's view by the evidence of strong economic performance of the borough's town, district and local centres and on the continued forecast need for retail floorspace shown in the 2017 RLSA. They are also in accordance with NPPF paragraph 23, which seeks to promote competitive, vibrant and attractive retail centres.
- 8.2.12 Policies E7 and E8 set criteria that change of use proposals should result in no more than a maximum of two adjacent non-A1 retail uses within a secondary frontage or a district centre. The Council considers this important to maintain competitive town and district centres and to prevent a weakening of the predominantly retail function of these shopping areas. The Council assessed the uses within the town centre shopping frontages to establish whether the existing frontages in the adopted 2003 Local Plan are still appropriate, and consequently recommended some alterations to frontages as a further modification to the Plan to improve the policies' effectiveness. The NPPF glossary definition for primary shopping areas supports the Council's proposed approach to shopping frontages as it indicates that the primary shopping area, which includes both the primary and secondary shopping frontages, should be an area where there is a high concentration of retail development.
- 8.2.13 The Submission Local Plan defines its primary shopping area to include those streets where the highest proportion of A1 (shop) uses, particularly retail multiples, are represented. These areas have the highest zone A rental values and highest pedestrian flow in the whole town centre. Such a policy approach supports the retail function of key shopping streets (primary frontages) by safeguarding against the loss of shops in these areas whilst encouraging a greater diversity of uses in secondary shopping areas<sup>98</sup>.

---

<sup>98</sup> Note that the Submission Local Plan proposes to replace the tertiary and specialist frontages with secondary frontages to accord with the NPPF.

8.2.14 For a change of use from an A1 retail unit in a local centre that provides for everyday needs to an alternative use, policy E9 introduces a new 12-month minimum marketing period. The Council considers that it is important to retain local shops of this nature in local centres, as well as isolated shops outside local centres that provide for everyday needs (for example, in local shopping parades) as they provide an essential local service and community facility for residents. They are environmentally sustainable as they reduce the need for people to travel to fulfil their everyday shopping needs and they provide a social as well as an economic function. Paragraph 70 of the NPPF supports the Council's stance with its recommendation for retention of valued community facilities and services such as local shops through planning policies and decisions.

8.2.15 The shopping frontages and policies E7, E8 and E9 should ensure that the borough's centres continue to provide competition and consumer choice, as advised by NPPF paragraph 23, and that people are able to make a single trip to these centres to fulfil several shopping purposes.

*Permitted development and change of use*

8.2.16 The Council recognises that certain changes of use of A1 shop units are now classed as permitted development under The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended). In cases where the Council receives a prior approval application for a change of use from A1 to A2 use, the Council is now obliged to allow it subject to it meeting certain other conditions, as set out in the Order<sup>99</sup>.

8.2.17 For prior approval changes of use from A1 to A3 or D2 use where the proposed unit falls below the stated size threshold the Order lists a different set of conditions that the proposal must meet to determine whether it is desirable. These conditions address the same criteria covered by Policy E7(4), for example relating to noise, transport and highways impacts. Of particular relevance, they also include:

“...the impact of the change of use—

- (i) on adequate provision of services of the sort that may be provided by a building falling within Class A1 (shops) or, as the case may be, Class A2 (financial and professional services) of that Schedule, but only where there is a reasonable prospect of the building being used to provide such services, or
- (ii) where the building is located in a key shopping area, on the sustainability of that shopping area, and”

(Schedule 2, Part 3, paragraph C.2(1))

---

<sup>99</sup> The conditions for a change of use from A1 to A2 or A3 to be allowed under a prior approval application are set out under Schedule 2, Part 3, Class C of the Order.

8.2.18 The policy is therefore relevant not only to planning applications, but also to applications for prior approval.

## **Appendix 8.1: Addendum Response to Q8.1**

## **ADDENDUM RESPONSE TO Q8.1**

**(prepared by Carter Jonas for Guildford Borough Council, May 2018)**

### **GUILDFORD LOCAL PLAN EXAMINATION**

---

The Guildford Retail and Leisure Study Addendum (2017 RLSA) was commissioned in order to update forecast capacity for new retail and leisure provision across the Borough and its main centres.

While the update did not employ a new household survey, it was considered that the findings of the extant household survey would still provide a robust baseline for assessing retail need. This was on the basis that no major retail schemes had come forward in the intervening period that would have significantly altered shopping habits. However, market shares were adjusted to take account of two new foodstores (Waitrose and Lidl), which were based on trade draw estimates.

The 2017 RLSA was updated using what was, at the time of reporting in early 2017, the most up to date baseline and growth figures on population, expenditure and retail floorspace productivity/efficiencies. Data on population was obtained from the Office of National Statistics (ONS) 2014-based Sub National Population Projections, while expenditure and retail sales growth related data was informed by Experian Business Strategies' Retail Planner Briefing Note 14 (published in November 2016).

While the above data publications have been superseded with a more recent data release, the changes to the population and economic variables are unlikely to be great enough to have a notable impact on forecast capacity identified in the 2017 RLSA. Therefore, forecasts for convenience retail, comparison retail, and food and beverage floorspace remain valid.

With the above in mind, this helps to answer the Inspector's query as to whether the plan's approach towards accommodating retail and other town centre uses in Guildford Town Centre are realistic and effective (Question 8.1). The Council's response to the Inspector's question highlights the strength of Guildford's retail economy, which sets it apart from most other town centres. The centre sits within the top 50 shopping centres in the UK; positioned at 29 in the Javelin VenueScore centre 2016 rankings. By comparison York is ranked at 28 and the Trafford Centre in Manchester is ranked at 30. In 2014, Guildford was ranked at 32 in the VenueScore rankings, which is a good indicator that the centre's shopping profile is strengthening.

It is well publicised that the retail and food and beverage sectors are experiencing major trading challenges from constantly shifting shopper habits, increase in business rates, increases in supply costs due to Brexit related currency costs, and competition from online shopping. This has seen many retail and leisure brands entering into administration.

However, where troubled retailers are rationalising store portfolios, they are largely confined to closing under-performing stores, which are generally located in poor performing centres. For top 50 centres such as Guildford, demand for retailer and F&B representation remains buoyant.

A review of current retail requirements (where named retailers identifying centres they are seeking space) for Guildford highlights strong demand. According to The Requirement List, 48 retailers have registered requirements for Guildford, with a combined requirement for 20,350 sqm (gross) of A1 floorspace (It should be noted that many multiples do publish their requirements due to competition sensitivities – as such the actual number of retailer requirements is likely to be higher). Notable retailers seeking representation in Guildford Town Centre include, fashion brands Oasis, Barbour, and Toast, alongside other key high street brands such as Lush Cosmetics, HEMA, Cycle Republic, Hawkins Bazaar, and Savers. Requirements are also identified for larger format stores including from Lidl (2790 sqm gross), Wilko (1,390 sqm gross), British Heart Foundation Furniture (740 sqm),

Poundworld (1,860 sqm), and The Cotswold Company (930 sqm) who require larger format stores. This highlights the importance of ensuring the availability of larger modern retail units in the town centre.

It is recognised within the industry that forecasting retail needs significantly beyond five years is a significant challenge given the various layers of assumptions and forecasts to identify need. Data variables used to inform forecast retail and leisure need are sensitive to economic changes, and the uncertainty with Brexit, means that longer term forecasts are less reliable. However, given that the 2017 RLSA is recent and the strength of Guildford Town Centre's retail and leisure economy, we consider that the identified need for convenience, comparison, and food and drink floorspace proscribed in the emerging Local Plan remains valid.

## **Question 9 - Spatial Strategy, Green Belt and Countryside Protection**

***This is a section on the soundness of the spatial strategy and the overall approach to Green Belt and the countryside. Site-specific matters, including local Green Belt and landscape issues, will be dealt with separately in relation to the individual sites.***

- 9.1 Is the spatial strategy as set out in the preamble to Policy S2 sufficient to explain the plan's approach to the overall distribution of development and guide future development during the plan period?**
- 9.1.1 Please note Policy S2 of the Submission Local Plan should be read alongside the draft proposed modification made to the policy and supporting text as part of the Council's response to *Question 4: The spatial development strategy* of the Inspector's Initial Questions.
- 9.1.2 The proposed modification sought to make the spatial distribution of development clearer through the insertion of two new tables:
- Table S2a indicating the different sources of housing supply during the plan period (e.g. completions/permissions, site allocations, windfall, etc)
  - Table S2b indicating the distribution of housing in relation to the spatial locations articulated in the "Introduction" section of Policy S2 (e.g. Guildford town centre, new settlement, development around villages, etc)
- 9.1.3 Together these tables seek to provide clarity regarding the quantum of growth proposed and the distribution of growth across the borough by way of reference to the hierarchy of spatial locations. The summary table that appears in front of the individual site allocation policies also provides a useful cross reference to the distribution of sites by way of reference to their spatial location, ward and number of homes). The quantum of development identified through the site allocations make up the significant majority of overall planned supply (approximately 10,000 homes). The Council therefore contend that the plan as now presented is sufficiently clear in illustrating the overall distribution of growth.
- 9.1.4 The Submission Local Plan makes provision for the borough's full housing need over the plan period. It does not therefore seek to defer a proportion of its housing allocations to neighbourhood plans or subsequent development plan documents. For this reason, it is not considered appropriate to provide numbers of homes per individual settlement.
- 9.1.5 Whilst the plan makes provision for its full need, it does rely on some trend based sources of supply, in particular windfall sites. It is appropriate for the plan to give some guidance as to where these sites might come forward to aid the decision-taking process. The Council considers the plan is sufficiently clear regarding this aspect. The list in paragraph 4.1.6 identifies the spatial locations which are considered to be most sustainable and where the Council intends to support future development opportunities. In contrast the spatial locations listed in paragraph 4.1.8 are those

where the Council has chosen to allocate specific sites in order to meet needs. Windfall sites are not expected to come forward within these spatial locations as the land remaining here is Green Belt where development is severely restricted.

**9.2 Having regard to the need for housing, does the plan direct it strategically to the right places? Relevant aspects are:**

- **The spatial distribution of existing and future need for housing**
- **Movement patterns**
- **Green Belt and landscape impact**
- **Infrastructure provision and constraints.**

- 9.2.1 The justification for the spatial strategy and the sites proposed is set out in more detail in the Housing delivery topic paper.<sup>100</sup> The plan directs development sequentially to those locations considered to be most sustainable. At the top of the hierarchy is Guildford town centre and urban area. This is by far the biggest settlement in the borough and is the county town of Surrey. It benefits from being a hub for bus and rail networks, both sustainable modes of transport, with Guildford bus station and Guildford railway station, the busiest in the county and serving five lines, and London Road (Guildford) railway station all located in the town centre. Guildford is also the only Surrey town where a Park and Ride network has been implemented. The town also has numerous higher order services and facilities, and numerous retail and employment opportunities. It is therefore an extremely sustainable location for new homes. Next in the hierarchy is Ash and Tongham urban area which is the borough's only other urban area and second largest settlement. It is also a sustainable location for growth and benefits from three rail stations which between them serve three lines. These two urban areas are followed by development opportunities within the larger inset villages and smaller identified villages in the Green Belt.
- 9.2.2 Having sustainably exhausted these locations for growth and only identified sites to meet 56% of Guildford's objectively assessed need (OAN), the Council explored the next set of spatial locations. Given the non-Green Belt land in the west of the borough, development was directed in the first instance to an urban extension of Ash and Tongham in spite of it being the smaller of the two urban areas. However even with the site A29, only 65% of OAN is capable of being met. As set out in more detail below and in the Council's response to *Question 8: Green Belt* of the Inspector's Initial Questions, this provided the strategic exceptional circumstances to justify release of Green Belt land.
- 9.2.3 Given the sustainability merits of Guildford urban area, development was directed to Guildford urban extensions in the next instance. Two strategic sites and one small site are proposed. These sites are able to integrate with the existing urban area, benefit from the existing services and facilities, and maximise the use of the existing networks of sustainable transport modes. Additionally the two strategic sites are of a scale capable of providing for a mix of uses and a significant package of infrastructure including two new rail stations, and a park and ride. They will also

---

<sup>100</sup> GBC-LPSS-SD-TP-004, paragraphs 4.64 to 4.164.

provide access to the town centre through delivery of and contributions towards the Sustainable Movement Corridor. This will benefit future and existing residents of Guildford and help increase the accessibility of public transport options.

- 9.2.4 Next, the spatial strategy sought to direct development towards new and then existing villages that are capable of either securing a significant level of new supporting infrastructure or helping to support and maximise the use of services and facilities that already exist. The new settlement at the former Wisley airfield is of a scale that can deliver a mix of uses and supporting infrastructure to ensure it can operate as a relatively self-contained settlement<sup>101</sup> and when built will be of a comparable size to the larger villages. Proposed infrastructure to ensure the settlement is sustainable includes a significant bus network to key destinations provided and secured in perpetuity, a local centre and both primary and secondary schools. Finally, the plan allocates a number of smaller sites around the villages. Whilst at the bottom of the hierarchy there are sustainability merits of directing homes here. These sites are capable of boosting early delivery and are directed to some of the largest villages with a range of services and facilities.
- 9.2.5 The spatial strategy was informed by the Green Belt and Countryside Study (GBCS). This study identified a range of potential development areas (PDAs) across a number of spatial strategy options, regardless of the extent to which the wider land parcel contributed towards the purposes of the Green Belt<sup>102</sup>. In considering which PDAs should be allocated the Council sought in the first instance to direct development away from the Area of Outstanding Natural Beauty (AONB) and those located within high sensitivity Green Belt<sup>103</sup>. This reflects the national importance of both designations and the extent to which the harm of developing these sites would significantly and demonstrably outweigh the benefits of doing so.
- 9.2.6 In relation to infrastructure provision and constraints, this is discussed in more detail in the answer to Questions 4.2 and 4.3 and the response to *Question 3: The housing trajectory* in the Inspector's Initial Questions, which outline the challenges that the A3 presents to early delivery. The Council has however sought to maximise early delivery through ensuring that the sites, and phasing of sites, that will be delivered in the first years of the new Local Plan, and therefore in the absence of the Department for Transport's Road Investment Strategy Road Period 1 and/or Road Period 2 schemes are located where traffic associated with them will have the least impact on the Strategic Road Network's links and junctions where current safety and congestion issues are the most acute.
- 9.2.7 For example, sites in the north of Guildford borough could be delivered earlier as the main constraints on the Strategic Road Network (SRN) that presently cause safety and congestion issues are proposed to be improved by the Road Investment Strategy (RIS) Road Period 1 schemes at M25 Junction 10/A3 Wisley interchange improvement and the M25 Junctions 10-16 scheme. In addition, sites to the west of

<sup>101</sup> This is discussed further in the response to Question 11.24.

<sup>102</sup> This is discussed in more detail in the response to *Question 8: Green Belt* of the Inspector's Initial Questions.

<sup>103</sup> See Housing Delivery Topic Paper (GBC-LPSS-SD-TP-004), paras 4.120 to 4.164.

Guildford borough are likely to have a different distribution of trips that would be more focused towards the Blackwater Valley. As a result, residents and businesses will have alternative ways of accessing the SRN via the A331 and M3 motorway, which was converted to a Smart Motorway with completion in 2017.

- 9.2.8 During these early years, targeted 'traffic hotspot' improvement schemes at the University and Stoke interchanges on the A3 Guildford will be delivered – as announced by Government in March 2017 – in combination with Submission Local Plan-realised improvements on the adjacent Local Road Network. In combination, these SRN and (Local Road Network) LRN schemes will be important to Guildford and the wider region in providing some congestion relief as well as safety benefits before Government and Highways England confirm their definite proposals for transforming the A3 Guildford through the Road Period 2 scheme.
  - 9.2.9 As set out above, the spatial strategy incorporates a mix of strategic and small sites. This achieves a balanced spatial distribution between smaller sites capable of being delivered quickly and strategic sites with longer lead in times but which contribute to meeting overall OAN and enable the delivery of significant infrastructure which is necessary to make the developments acceptable, but which will also have wider benefits. This includes sufficient new secondary schools to meet the need generated in both the east and the west of the borough, two new rail stations and a park and ride, two new slip roads onto the A3 and a new railway bridge at Ash. More detail of the infrastructure proposed to be delivered as part of the plan is available in the Submission Local Plan – Appendix C Infrastructure Schedule.
  - 9.2.10 Appendix 2 is a figure showing the relationship between the phasing of developments and transport schemes. The data for the phasing of developments is drawn from Appendix 1. This is an update to Figure A8-B from the Transport topic paper (December 2017).
- 9.3 Are the proposed new business land and floorspace allocations in the right strategic locations? Relevant aspects are:**
- **The spatial location of existing and future needs**
  - **Movement patterns**
  - **Green Belt and landscape impact**
  - **Infrastructure provision and constraints.**
- 9.3.1 The spatial strategy for meeting employment needs is different from that identified for housing. Considerations for meeting need include the sequential test for Office and Research & Development floorspace by directing it to town centre locations first, followed by edge of and out of centre locations. The other contributory factor is the location of existing sites and the availability of new sites. Guildford borough has a strong economy with high levels of employment provision, a forecast employment need for office floorspace and industrial land over the plan period, and a general lack of new suitable and available sites. Having regard to these factors, the spatial strategy has in the first instance sought to protect existing employment sites (Policy E3), in particular the Strategic Employment Sites (SES) and Locally Significant

Employment Sites (LSES)<sup>104</sup>, which play an important economic role. Protecting existing sites prevents a worsening of employment provision however it is still necessary to identify new sites in order to meet identified needs.

#### Office and Research & Development (B1a and B1b)

9.3.2 Policy E2(1) seeks to direct significant Office and Research & Development floorspace to sequentially preferable locations in accordance with the NPPF<sup>105</sup>. The Council's response to *Question 28: Employment* of the Inspector's Initial Questions proposes a draft modification to Policy E2(1) which no longer differentiates between the town centre and SES. There is a present lack of suitable and available sites for employment growth in the town centre, however there are expansion opportunities at a number of SES<sup>106</sup>. Given the modification proposed, these sites are now considered to be akin to town centre sites and are therefore appropriate for expansion. In addition to those that already exist, the plan proposes to designate the new employment site at A25: Gosden Hill Farm as a SES once developed as it would meet the criteria for designation<sup>107</sup>. The majority of the planned growth not already permitted is being directed to an extension of the Surrey Research Park (A26: Blackwell Farm) and the new headquarters building to the north of A25: Gosden Hill Farm. Both employment sites will be in close proximity to the proposed new rail stations and are considered to be sustainable locations for this high trip generating use. There are no alternative suitable sites that are capable of meeting the identified need.

#### Industrial, warehousing and storage (B1c, B2 and B8)

9.3.3 Industrial sites do not need to be directed toward sequentially preferable locations given they do not generate a significant number of trips. The majority of the planned growth not already permitted is being directed towards an extension to Slyfield Industrial Estate (A24: SARP) and an expansion at A58: Land around Burnt Common warehouse. In addition to the allocation site A58 has the potential for further industrial land should a future update to the Employment Land Needs Assessment identify a greater need than currently identified. This provides for sufficient flexibility in the future to meeting industrial need as it can often prove difficult to find suitable land for this use. A smaller amount of industrial land is also proposed to be met on A35: Wisley airfield which, once built, will be designated as a LSES as it would meet the criteria for designation<sup>108</sup>. All these sites have easy access to the strategic road network and are located on the edge of settlements where they will have the least impact. There are no alternative suitable sites that are capable of meeting the identified need.

---

<sup>104</sup> Please see draft proposed modification to Policy E3 in response to *Question 5: The balance of land uses* of the Inspector's Initial Questions.

<sup>105</sup> NPPF, paragraph 24.

<sup>106</sup> Notably Surrey Research Park and Send Business Centre.

<sup>107</sup> See Submission Local Plan paragraphs 4.4.6 and 4.4.7.

<sup>108</sup> ibid

- 9.3.4 The principle outlined above for housing of directing development away from the AONB and high sensitivity Green Belt land is also applicable to employment allocations.
- 9.3.5 The terms of infrastructure provision and constraints with respect to new business land and floorspace allocations are similar to those discussed with respect to housing in the response to Question 9.2.
- 9.4 *Having regard to the extent to which it is proposed to release Green Belt land and develop greenfield sites, do the plan's policies strike the right balance (in terms of housing provision) between the use of urban and previously developed land and urban extensions? Has the potential for further residential development in the urban area been adequately explored? (See also Item 5 of my initial questions.)***
- 9.4.1 The Council has taken a brownfield first approach in developing its spatial strategy. Guildford town centre and urban area, Ash and Tongham urban area and previously developed land in the Green Belt are at the top of the hierarchy and were all explored before moving on to explore greenfield and/or Green Belt opportunities.
- 9.4.2 Over the plan period, the plan makes provision for almost 3,000 dwellings/houses on previously developed sites in the Green Belt and within the Guildford, and Ash and Tongham urban areas. This is in addition to any outstanding permissions and completions since 2015. All available sites have been assessed for their suitability as part of the Land Availability Assessment (LAA) process. The LAA<sup>109</sup> is a comprehensive assessment that considered approximately 1,000 sites. In accordance with the NPPF<sup>110</sup>, the plan relies only on sites that are either deliverable or developable. To meet the tests a site must be available, suitable and viable to be delivered at the point envisaged. Appendix E of the LAA 2017 lists all the discounted sites and the reason why these have not been identified as suitable sites – this includes a mix of suitability, viability and deliverability concerns. Through the LAA process, the Council has discounted approximately 30 sites within Guildford town centre and approximately 90 sites within the urban area. In Guildford town centre in particular there are a number of constraints and considerations that influence its capacity to accommodate more homes.
- 9.4.3 The first consideration is that residential development in the town centre should usually be in addition to and not instead of high trip generating uses like offices and retail. This is consistent with the NPPF and serves to maximise the use of sustainable modes of transport and ensure the town centres remain vibrant with a 24-hour economy.
- 9.4.4 The second issue is the need to ensure that development does not harm the important character of the town centre. Guildford is a historic town with numerous listed buildings, conservation areas, important views, and natural features such as

---

<sup>109</sup> GBC-LPSS-SD-006a.

<sup>110</sup> NPPF, paragraph 47.

the River Wey and a challenging topography. This limits the height that is considered appropriate in some of the more sensitive locations. The Council is in the process of commissioning a views study for Guildford town centre that will identify the most important views and will be able to help inform future development proposals. The Council has however sought where appropriate to increase the density assumptions on some sites in response to representations received or the availability of new evidence. The draft NPPF also places greater emphasis on the efficient use of land and the density of new development. The current timetable for publishing the NPPF is Summer 2018 and so this policy will likely to be in force when the majority of these planning applications are submitted. The Council therefore considers that there is sufficient policy direction to ensure that sites are maximised to deliver sustainable development.

- 9.4.5 An additional constraint to further delivery is the significant flooding constraints caused by the River Wey, which runs through the town centre. Guildford town centre experienced a significant flooding event over Christmas 2013, which resulted in the River Wey bursting its banks and flooding significant parts of the town centre including many shops, restaurants and homes. Whilst some of the land is 'developed' flood zone 3b, national policy states that even here development should only be approved where the proposed footprint is no greater than the existing building(s) and there is no increase in development vulnerability. This severely limits a number of sites which may otherwise have been considered suitable for housing.
- 9.4.6 The draft Local Plan 2014 included a number of town centre sites which are located in flood risk areas. The Environment Agency objected to these on the basis that the Council had not appropriately undertaken a flood risk sequential approach to the location of development, thus steering development to areas with the lowest probability of flooding in accordance with national policy. Having undertaken the sequential test, a number of sites were removed in the Regulation 19 Local Plan 2016.
- 9.4.7 The Council commissioned a Guildford Town Centre Masterplan. As part of this process a Vision document was prepared by consultants Allies and Morrison in 2014. The Vision document was followed by the Town Centre Masterplan in 2016. This was never intended to be a statutory planning document and was instead aspirational with a long time horizon. It included a number of potential development proposals however it was not designed to test sites in accordance with the NPPF's tests of deliverability that the LAA is required to do.
- 9.4.8 The Guildford Town Centre Masterplan did however serve to inform the preparation of the Council's Guildford Town Centre Regeneration Strategy 2017. This document forms the basis for the work programme by the Council's Major Projects team. It took forward the sites that were considered more likely to be developable which tended to be those sites where the Council has a land interest. Whilst the work on a number of these sites is not progressed far enough to include these as site allocations in the plan, they can nevertheless come forward in the future as either windfall sites or through the subsequent preparation of a Town Centre Area Action Plan, should the scale of change justify this approach. Given the complexities of bringing these sites

forward, including land assembly and leases, these are considered to be longer term development opportunities and are likely to be delivered well into the plan period, or potentially beyond.

- 9.4.9 There are further sites identified within the Town Centre Masterplan which, whilst in the Council's ownership, are not considered to be realistic development opportunities to be explored further through the Regeneration Strategy work. One example is Woodbridge Meadows, which the Submission Local Plan designates as an Industrial Strategic Employment Site. The TCM identifies this site as a potential housing site for approximately 800 homes. The Council owns the freehold of this land and representations have been received that the Local Plan, as part of its brownfield first policy, should have allocated sites such as this which are located close to the town centre and may be appropriate for higher density housing thereby helping to minimise the use of Green Belt land. The first issue is that industrial land is needed and any loss of such land would need to be replaced elsewhere, most likely on Green Belt land. However the Council recognises that this would have the benefit of a smaller land take than the corresponding number of homes would have due to the reduced density of housing that would be appropriate in this location compared to the Woodbridge Meadows site.
- 9.4.10 However the bigger issue is the deliverability of this land within the lifetime of the plan. The site is let to a number of different tenants on separate and varying lease terms. Half of the western part of the site running along the railway line is leased for 111 to 150 years whilst the other half is leased for 40 to 100 years. The eastern part of the site running along the River Wey is partly subject to flood risk but the significant majority of it is leased for 50 to 100 years. This land is therefore not available during the lifetime of the plan and could not be considered to be a realistic housing site for inclusion in the plan.
- 9.4.11 As set out above, only 56% of Guildford's OAN is capable of being met sustainably on non-greenfield and/or Green Belt land. Even if additional sites were considered to be deliverable/developable within the town centre or urban areas, this would not remove the need for releasing Green Belt land. Additionally, it is likely that any sites that would come forward would not be capable of being delivered in the first five years. Given the shortfall in the early years, the plan requires the delivery of all the smaller Green Belt sites and part of all the Countryside Beyond the Green Belt (CBGB) and strategic Green Belt urban extensions. Even with these sites, the plan requires a stepped trajectory to deliver a rolling five year housing land supply. Additional urban area sites would not act as a substitute for any site allocations within the plan.

**9.5 *Having regard to 9.2 to 9.4 above, are the overall amount of land proposed to be released from the Green Belt, and the strategic locations for Green Belt release, justified by exceptional circumstances?***

- 9.5.1 The council considers that the justification set out above in relation to the proposed spatial strategy combined with the evidence summarised in *Question 8: Green Belt* of the Inspector's Initial Questions provides the strategic level exceptional

circumstances for releasing the proposed amount of land from the Green Belt. To not do so would result in a significant undersupply compared to the OAN, including an undersupply against the affordable housing need. Importantly, the consequences of this within Guildford would be to exacerbate the existing affordability issues and have an adverse impact on economic growth in the area, which would lead to unsustainable commuting patterns.

**9.6 *Does the plan take a sound approach towards the insetting of various villages from the Green Belt?***

- 9.6.1 The justification for insetting of villages is discussed in more detail in *Question 8: Green Belt* of the Inspector's Initial Questions<sup>111</sup>. The policy requirement in the NPPF<sup>112</sup> to inset those villages which do not make an important contribution to the openness of the Green Belt, together with the detailed consideration of each village in GBCS Volume IV, constitute the exceptional circumstances required to amend Green Belt boundaries around selected villages.

**9.7 *Taking into account the extent of housing, employment and other needs, does the plan take a sound approach towards the protection of the landscape, including the AONB and AGLV, and the countryside generally?***

- 9.7.1 As set out above in detailing the spatial strategy for meeting needs, the Council has sought to direct development away from the AONB. The Submission Local Plan does not allocate any housing or employment on undeveloped areas within the AONB given its national importance and the NPPF's requirement that major development be refused<sup>113</sup>. Whilst A32: Mount Browne and A33: University of Law are both located in the AONB, these are previously developed sites and their redevelopment is considered appropriate and will not have a detrimental impact on the AONB. The only other allocation which dissects part of the AONB is the access road into site allocation A26: Blackwell Farm – discussed further below.
- 9.7.2 The AGLV is a local designation which will remain until such time as Natural England complete their planned AONB boundary review. A small part of the southern corner of site allocation A26: Blackwell Farm forms part of the AGLV. The Council does not consider that the development of the site will have a significant impact on the AGLV. It is on the very edge of the site adjacent to open countryside and, as required by the site policy, the design of the site will need to respond to the transition from urban to countryside. The landscape impacts of the road and the development at A26 are discussed in more detail in the Council's response to Question 11.15 and 11.17.
- 9.7.3 The Surrey Hills AONB Board commissioned and submitted to Natural England the findings of a Natural Beauty Evaluation report<sup>114</sup>, which identified 38 candidate areas to be considered for inclusion within the Surrey Hills AONB. Whilst these candidate areas do not at present carry additional weight and the outcome of the review may

---

<sup>111</sup> Paragraphs 8.16 – 8.18 and Appendix 2.

<sup>112</sup> NPPF, paragraph 86.

<sup>113</sup> NPPF, paragraph 116.

<sup>114</sup> GBC-LPSS-SD-017a.

identify different areas for inclusion in the AONB, the Submission Local Plan has not identified any allocations within these areas.

- 9.7.4 The plan has had to allocate a significant amount of greenfield land, some of it Green Belt, in order to meet needs. These allocations have been informed by the GBCS which identified PDAs based on an assessment of the environmental capacity of the land parcels to accommodate development. This looked at a range of factors including land uses, landscape character and value, nature conservation, cultural heritage and flood risk. Furthermore, as discussed above the spatial strategy has sought to direct development where possible away from highly sensitive Green Belt. The Council therefore considers that the plan has taken a sound approach to the protection of the countryside generally.
- 9.7.5 Policy P3 seeks to protect the remaining area of countryside land that is not either existing or proposed Green Belt. This land forms a thin strip of land to the west of Ash and Tongham along the A331 and Blackwater Valley. Much of this land is unsuitable for development in any case given proximity to the trunk road and flood risk however the policy seeks to protect the undeveloped nature of this land to protect the green corridor and Biodiversity Opportunity Area running along the River Blackwater and the role it plays in preventing coalescence with the Aldershot urban area.

**9.8 *If the Plan had to accommodate a greater housing requirement, for example through a higher OAN, what would be the implications in terms of the spatial strategy?***

- 9.8.1 The Council considers that the current spatial strategy informed through the sequential exploration of the different spatial locations would remain a robust and appropriate approach. If the plan had test accommodating a greater housing requirement the Council considers the same approach would need to be followed. This would require the assessment of each spatial location to explore the maximum amount of housing that could be accommodated until the harm of doing so significantly and demonstrably outweighs the benefits of doing so. At this point one would move to the next spatial location and undertake the same exercise. The balance between harm and benefit are linked to the scale of housing need that needs to be met weighed against the relative environmental and other harm of doing so.
- 9.8.2 Given the site selection process undertaken to inform the Submission Local Plan, the Council do not believe that a greater number of suitable and available sites could be realistically identified within the urban areas, on brownfield sites or within villages. Additionally, as set out in more detail in the response to Question 9.9 below, the Council do not consider that additional allocations around Ash and Tongham would be sustainable in spite of its non-Green Belt status. For this reason, it considers that a greater OAN could not be met unless consideration was given to removing additional land from the Green Belt.

**9.9 *What are the reasons that have led the Council to propose including new land in the Green Belt around Ash and Tongham, and can the circumstances be regarded as exceptional? What are the implications for the future housing needs of this Urban Area?***

- 9.9.1 The response should be read alongside the Council's response to *Question 8: Green Belt* of the Inspector's Initial Questions. The Council's case for exceptional circumstances is a combination of the following circumstances:
- maintaining separation between Ash and Tongham urban area and the village of Ash Green;
  - a significant level of development has already been directed towards Ash and Tongham since 2012, outside of the emerging Local Plan process through smaller piecemeal and ad-hoc planning applications<sup>115</sup>;
  - the location of a significant part of this area within AGLV and part AONB/candidate AONB
- 9.9.2 The detail of these considerations, including the findings of the GBCS, and the overall justification for adding the sites to the Green Belt, is set out within the Green Belt and Countryside topic paper<sup>116</sup>.
- 9.9.3 Whilst the Council is proposing additional Green Belt land in this location, this is not considered to constitute the creation of "new" Green Belt for which specific criteria apply (NPPF, paragraph 82). The Metropolitan Green Belt within which Guildford borough sits covers over 500,000 hectares. The extension of approximately 200 hectares equates to a change of some 0.04 per cent. This is not considered to be of a scale that constitutes the creation of New Green Belt particularly when the NPPF refers to it in the context of planning for larger scale development such as new settlements or major urban extensions, neither of which is applicable in this instance. This is also consistent with paragraph 82, which states that the general extent of Green Belts across the country is already established. Paragraph 83 suggests that Green Belt boundaries can be altered – that is, to both exclude or include land – through the Local Plan process, so long as the exceptional circumstances are identified.
- 9.9.4 The Council considers that the exceptional circumstances exist for altering Green Belt boundaries in this area and justify the limited extension to the designation in accordance with paragraph 83 of the NPPF.
- 9.9.5 The Council considers that the additional Green Belt will not unduly restrict the ability of this area to meet future housing need. Given the extent to which Green Belt land has had to be used to meet OAN in this plan and the scale of Green Belt that remains

---

<sup>115</sup> This small scale and incremental approach to development within this area means that homes are being delivered here without the other mix of uses and supporting infrastructure that sites of this overall scale would normally deliver. This is particularly due to the current inability to pool contributions until the Community Infrastructure Levy (CIL) is in place. It is expected that planning applications in this area are likely to continue to come forward ahead of the new Local Plan and accompanying CIL, which will further exacerbate this issue.

<sup>116</sup> See Green Belt and Countryside Topic Paper (GBC-LPSS-SD-TP-003), paragraphs 4.98 to 4.118.

in the borough, irrespective of the proposed new Green Belt, Green Belt boundaries are likely to need to be reviewed again at the end of the plan period if Guildford is to meet its future housing need. The current plan allocates over 100ha of CBGB land for housing. Whilst the plan is seeking to re-designate approximately 200ha of CBGB as Green Belt, the Council considers that most of this land would remain unsuitable for allocation in any future Local Plan review. It either forms a strong anti-coalescence role between the urban area and Ash Green village or is designated AGLV/AONB. Whilst the AGLV designation will cease to exist following the AONB boundary review, it is likely that some of this land may have become AONB.

- 9.9.6 As discussed above, development has been attracted to this location on the basis of the lesser protection it carries compared to Green Belt land. The Council considers that the scale of growth that the plan makes provision for has sustainably maximised this spatial location and further growth would be harmful. Furthermore, from a delivery point of view, the Council does not consider it realistic that further allocations in this area would likely deliver any more homes in the early years given the number of Grampian permissions that already exist here awaiting sufficient Suitable Alternative Greenspace (SANG) to become available to mitigate its impact on the Special Protection Area (SPA).
- 9.9.7 Extending the Green Belt boundary would enable a full and thorough assessment to be undertaken as part of a future Local Plan review of each spatial location and the benefits of meeting future identified housing need against the harm of doing so. Given that a future Green Belt review will certainly be necessary, the addition of Green Belt in this area will enable this assessment to be undertaken on a more consistent and comparable basis across the borough.

## **Question 10 - Built Environment and Heritage Assets**

- 10 The Council's response to this question is still that set out in the Council's response to *Question 9* and *Question 34* of the Inspector's Initial Questions. Draft modifications have been proposed to the heritage and design policies (D1, D3 and D4) in line with the Inspectors initial comments.

### ***10.1 Is the plan effective in respect of the promotion of good urban design on all sites, but especially on its major strategic allocation?***

- 10.1.1 Submission Local Plan Policy D1 and D4 have been combined into a new draft policy, which takes into account the advice in the PPG on planning objectives to help achieve good design. It then goes on to identify specific design principles that are applicable to certain areas within the borough, including the strategic site allocations, that will be accommodating increased development as a result of the plan. The revised policy requires masterplans for strategic sites that will be subject to assessment by the Design Review Panel. The Council considers that the revised policy will encourage good urban design on all sites including the major strategic allocations.

### ***10.2 Is the plan sound in respect of its approach to heritage assets?***

- 10.2.1 A draft modification to D3 has been proposed that requires the impact of development proposals on heritage assets and their settings to be considered in accordance with case law, legislation and the NPPF. This ensures the plan is sound in respect to its approach to heritage assets.

## **Question 11 - Site Allocations**

### A5 Jewsons site, A6 North Street Redevelopment, A7 Guildford Station, A9 Walnut Tree Close

#### **11.1 Could the plan be more ambitious in the number of dwellings it might achieve on these sites? Should site A9 be residential?**

##### A5, Jewsons

- 11.1.1 This site was allocated for 125 homes in the Regulation 19 Local Plan (2016). Representations by the site promoter indicated that the density should be higher and more in line with the neighbouring Station View site which has recently been built out. The capacity of the site allocation was increased in the Regulation 19 Local Plan (2017) to 175 homes. Whilst still lower than the upper end of the figure range given the site promotor (approximately 260 homes), this is considered appropriate for this site given its context.
- 11.1.2 The Council acknowledges that it is in a sustainable location close to the train station and town centre and therefore in principle appropriate for a higher density of development. However, in contrast to the Station View site, Jewsons is more sensitively located with longer views from the River Wey nearby. More careful design would therefore be required at the northern end and heights would be more restricted in order to protect important views. This impacts on the site's capacity however the Council acknowledges that further detailed design work, including long views from the tow path that show the site in relation to the Wey and Godalming Navigation Conservation Area or from the Cathedral, may yield additional capacity. However, the plan seeks to be cautious in its allocation assumptions acknowledging that it does not present a cap on the level of development and enables greater flexibility in supply should the planning application process identify a higher figure as being appropriate. As a general principle, the Council considers this to a robust approach as it reduces the risk of relying on a capacity that may prove unachievable.

##### A6, North Street Redevelopment

- 11.1.3 This response should be read alongside the Council's response to *Question 6: North Street site* of the Inspector's Initial Questions. The draft modification proposed as part of that response sought to provide for greater flexibility in the land uses should the evidence of retail need change in the future. The amended site allocation policy expresses both retail and residential numbers as approximate numbers rather than minimum and maximum numbers as previously. These amendments address the site promoters concerns that the original site allocation did not provide for sufficient flexibility for changing circumstances and are consistent with their residential capacity assumptions.

#### A7, Guildford Station

11.1.4 The Submission Local Plan allocates this site for a mix of uses including 350 homes.

An appeal on this site was allowed in January 2018 for a mixed use scheme including 438 homes (an extra 88 dwellings). There is no indication that this scheme will not be implemented. A draft modification is therefore proposed to amend the allocation in line with the permission. This is consistent with the Council's approach of retaining any unimplemented permissions as allocations in the plan.

#### A9, Walnut Tree Close

11.1.5 This site allocation is located entirely within Flood Zone 3, with 98.3% of the site located within Flood Zone 3b, which is the functional floodplain. Whilst some of the land is 'developed' flood zone 3b, national policy states that development should only be approved where the proposed footprint is no greater than the existing building(s) and there is no increase in development vulnerability. A change from the current use of the site, B1 to C3 would therefore be contrary to national policy as this would be placing a more vulnerable use in this location.

### **11.2 *Should the plan allow for student accommodation on any of the above sites, given the proximity to the University?***

11.2.1 The only site promoter that is seeking potentially student accommodation is A5 Jewsons. The remaining sites are progressing mixed use developments with C3 housing. Whilst A9 is seeking residential on the site in addition to offices, this would be unsuitable given the flooding issues discussed above.

11.2.2 The site promoter at A5 Jewsons is seeking flexibility in their allocation to deliver either C3 or student accommodation. Whilst the council acknowledges that the site is located in close proximity to the University, the suitability of the site for student accommodation needs to be assessed alongside other schemes which are being progressed within this small area. In addition to the existing purpose built student accommodation along Walnut Tree Close and the fact that many houses here are currently already occupied by students, there are a number of additional schemes that are currently progressing through the planning application process.

11.2.3 Approximately 900 bedspaces are being proposed on two sites nearby which are not identified in the Local Plan. This scale of additional student accommodation combined with the existing provision in this locality is considered to be sufficient provision. Whilst close to the University, the Council wishes to retain a mixed community with a proportion of C3 housing. The allocation at Jewsons for approximately 175 C3 homes will help to achieve this balance. To provide further student accommodation on this site would lead to an inappropriate intensification of students and adversely impact upon the remaining proportion of general market housing along this street.

## A15. Land at Guildford Cathedral

### **11.3 How is it intended to mitigate the effect of the site on the setting of the Cathedral?**

11.3.1 The Council notes the contents of the Hearing Statement submitted by the promoters of this site in relation to this question. The Council would also only add that it acknowledges that this is a very sensitive site and that development within this allocation will have an effect on the setting of the grade II\* listed Cathedral. The Council is in the process of commissioning a views study for Guildford town centre that will identify the most important views of the Cathedral and will help to shape the form and positioning of future development, the impact on both short and long views will be considered as part of the detailed design process guided by this document. Landscaping needs to be carefully considered as it will play a major role in mitigating the impacts of development, both in terms of the effects on the immediate site and in longer views of the Cathedral. For example, reinstatement of Maufe's original avenue of trees lining the southern processional route will help to screen new development from this important view as well as providing a heritage benefit in reinstating part of the original landscaping scheme and careful consideration of roof form and material may help to integrate any new housing into the existing townscape in longer views of the site.

## A22, Land north of Keens Lane, Guildford

### **11.4 What traffic and access issues arise in respect of the site and what measures are proposed in relation to them?**

#### Summary

- 11.4.1 This response explains the traffic and access issues in respect of site A22: Land North of Keens Lane and the measures proposed to mitigate them.
- 11.4.2 Motion, transport consultants representing the site promoter, has prepared a technical note titled 'Highways and Transport Appraisal' dated 2 August 2014. This is available at: [https://getinvolved.guildford.gov.uk/gf2.ti/af/482562/71440/PDF-/Local\\_Plan\\_2014\\_Steve\\_Forman\\_site\\_61\\_attachmen\\_Ashill.pdf](https://getinvolved.guildford.gov.uk/gf2.ti/af/482562/71440/PDF-/Local_Plan_2014_Steve_Forman_site_61_attachmen_Ashill.pdf)
- 11.4.3 This response summarises the technical note produced by Motion and additionally considers highway boundary information and the latest accident data.
- 11.4.4 There are viable options for achieving suitable vehicular access from either Keens Lane or Tangley Lane. There is an existing access to the site towards the eastern end of Keens Lane and initial assessment of this site indicates that this access is likely to be able to accommodate the quantum of development (150 homes and a care home with approximately 60 beds) being proposed.
- 11.4.5 The Strategic Highways Assessment (June 2016) predicts that based on the AM Peak hour average (0700-1000) the development proposals are likely to generate circa 146 two-way vehicular movements. The traffic impacts described in the

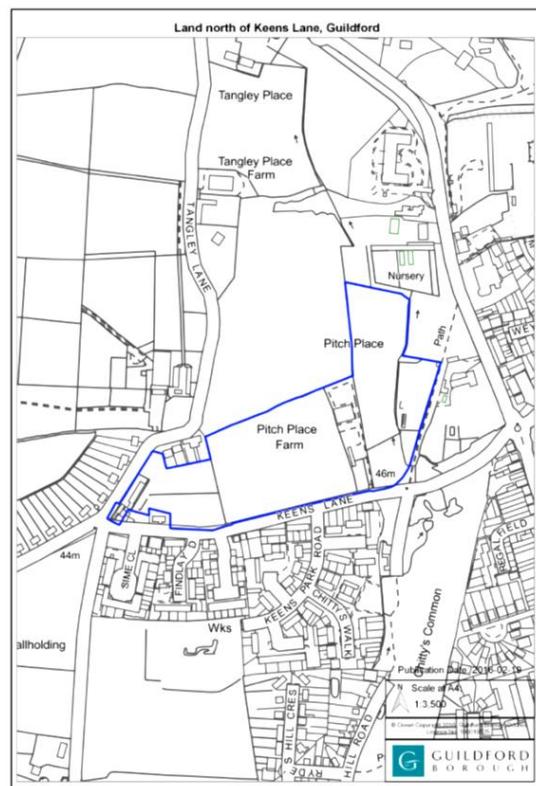
technical note prepared by Motion uses the TRICS database and predicts circa 83 trips in the AM peak. The Motion note and the traffic impacts described in the note have not been subject to scrutiny by the highways authority.

- 11.4.6 The site is well located in terms of maximum walk distances to the key facilities and offers the potential for future residents to undertake longer distance journeys by public transport. There are opportunities to provide new and improved footways along Keens Lane and Tangleay Lane to connect into the site.
- 11.4.7 It is considered that, at the planning application stage, an applicant will be able to demonstrate the safe operation and performance of an access at Keens Lane, either as existing or improved as necessary.

#### Highway Network

- 11.4.8 The local highway network is focused around the A322 Worplesdon Road, which is a single carriageway road subject to a 30 miles per hour speed limit in the vicinity of the site. The A322 Worplesdon Road runs on a north / south alignment and is a principal road of the Local Road Network, providing a strategic link between Guildford (to the south) and Bagshot, via Brookwood (to the north). The A322 provides connections to the wider motorway and Strategic Road Network, connecting to the A3 (circa two kilometres to the south) and the M3 (circa 12 kilometres to the north).
- 11.4.9 The site abuts Keens Lane, along the southern boundary, and Tangleay Lane, along (part) of the western boundary. The site is currently accessed from Keens Lane, which provides a direct link to the A322 Worplesdon Road, some 200 metres to the east of the existing site access. The junction of Keens Lane and A322 Worplesdon Road is in the form of a small (kerbed) four-arm roundabout.
- 11.4.10 To the west of the site access, Keens Lane connects to Tangleay Lane and Gravetts Lane, where there is a mini-roundabout junction. Tangleay Lane and Gravetts Lane are more rural in nature although both serve existing residential land uses.
- 11.4.11 Keens Lane has a carriageway width of circa five metres (at its eastern end, where it joins the A322 Worplesdon Road) although this narrows to between 4.8 metres and 4.35 metres where Keens Lane runs adjacent to the site's southern boundary. Tangleay Lane has a carriageway width of 5.3 metres, to the west of the site, although this narrows to the north.
- 11.4.12 There is an existing footway on the south side of Keens Lane (no footway on north side), and on the west side of the southern residential section of Tangleay Lane. A public right of way (bridleway) runs alongside the eastern boundary of the site, which provides a pedestrian/cycle link between the A322 Worplesdon Road and Keens Lane.
- 11.4.13 The area to the east and south of the site is predominately residential, forming part of the built up area to the north of Guildford. To the north and west of the site the area is

characterised by agricultural land. The site lies on the northern edge of the built up area surrounding Guildford.



*Figure 11.1 A22: Land north of Keens Lane, Guildford - Policy Map*

#### 11.4.14 Figure 11.2 Existing site access from Keens Lane:





Figure 11.3: Keens Lane

#### Access Strategy

- 11.4.15 There are viable options for achieving suitable access are from either Keens Lane or Tangleay Lane. The Motion note concludes that the quantum of development being proposed (150 homes and a care home with approximately 60 beds) could be adequately served from Keens Lane, subject to confirmation of land ownership and highway boundary information.
- 11.4.16 Surrey County Council has provided highway boundary information which confirms the boundary of the highway controlled by Surrey County Council abuts the site.
- 11.4.17 In terms of the location of the access to the site, the Motion note considers that the most appropriate location for an access would be towards the eastern end of Keens Lane. The eastern end of Keens Lane provides a suitable carriageway width for two-way traffic. This then narrows to circa 4.4 metres by the eastern edge of the site (just to the east of the existing access to Pitch Place Farm). Developing the access at this location presents an opportunity to use some of the land within the site to create a wider carriageway at this point.
- 11.4.18 Policy A22 includes as an opportunity '(2) Encourage cycling and pedestrian movements from the site'. The Motion note recommends that that a new footway is provided on the north side of Keens Lane and the east side of Tangleay Lane and that it would be beneficial to create a pedestrian / cycle link within the site to the existing bridleway, which runs alongside the eastern boundary of the site.
- 11.4.19 The highway boundary information confirms that the boundary extends beyond the carriageway on the north and south side of Keens Lane and the eastern and western side of Tangleay Lane making the provision of new footways achievable.

### Traffic Impact

- 11.4.20 The Strategic Highways Assessment (June 2016) predicts that based on the AM Peak hour average (0700-1000) the development proposals are likely to generate circa 146 two-way vehicular movements. The traffic impacts described in the technical note prepared by Motion uses the TRICS database and predicts circa 83 trips in the AM peak. The Motion note and the traffic impacts described in the note have not been subject to scrutiny by the highways authority.

### Accessibility

- 11.4.21 There are four bus stops located within a four hundred metre walking distance of the site. The site benefits from four bus stops all of which are located within a 400 metre walk distance of the site. The bus stops provide access to bus services 26/27/28/91/538 linking the site to Guildford and Woking town centres as well as rail connections at Guildford and Woking. The site is well located in terms of maximum walk distances to the key facilities and offers the potential for future residents to undertake longer distance journeys by public transport.

### Accident data

- 11.4.22 In the last five years there were two (slight) accidents recorded at the A322 roundabout with Keens Lane. No serious or fatal accidents are recorded in the vicinity of the site within the last five years<sup>1</sup>.

**11.5 *How is it intended to deal with the proximity to the SPA? What are the exceptional circumstances at a local level that justify the removal of this site from the Green Belt?***

- 11.5.1 The wording of the site allocation policy has been drafted to reflect the requirements of Natural England and Policy NRM6 of the South East Plan with respect to avoiding impact on the SPA. No homes are to be located within 400m of the SPA. Whilst the C2 care home is proposed to be located within 400m of the SPA, the detailed proposal will be subject to agreement with Natural England and includes a number of caveats including that future occupiers will be restricted to those with limited mobility.
- 11.5.2 Direct and indirect impacts on the SPA are avoided and mitigated through the established approach based around SANG and SAMM, and through bespoke measures included in the policy. Policy P5 ensures that residential units will be built outside the 400m exclusion zone and that adequate and appropriate mitigation and avoidance measures will be required. Policy ID4 provides protection for Whitmoor Common.
- 11.5.3 This response should be read alongside the Council's response to *Question 8: Green Belt (appendix 5)* of the Inspector's Initial Questions and *Question 9.5* of the Inspector's Matters and Issues. The local level exceptional circumstances that justify

---

<sup>1</sup> Crash Map website accessed 30/04/18 <http://www.crashmap.co.uk/search>.

this site is the limited harm that this small Guildford urban extension would have on the wider Green Belt given its location on a medium sensitivity land parcel. This site is also able to accommodate a new care home for which there is an identified need and a lack of suitable and available alternative sites. The site is also able to contribute towards meeting housing need early in the plan period.

#### A23, Land North of Salt Box Road, Guildford

##### **11.6 *Is the allocation for a burial ground on site likely to affect the nearby SSSI? Are measures likely to be necessary to prevent detrimental effects?***

- 11.6.1 Measures necessary to protect the SSSI (also designated as SPA) will be controlled or required by Statutory Consultees, in this case Natural England as the body responsible for SSSI's and SPA's, the Environment Agency in regard of Groundwater and the Local Planning Authority via the requirement for an appropriate assessment in accordance with the Habitat regulations as part of any planning application. Appropriate measures can be secured. Natural England advised that subject to suitable controls being put in place on any car parking to ensure the site is restricted to people specifically wishing to visit the cemetery then they would have no in principle objection to the proposal. This would be to ensure that people could not use any such car park to gain direct access to the Thames Basin Heaths SPA. In practical terms this will require the site to have a secure boundary and for access to be controlled through specified opening hours.
- 11.6.2 The site also has the following benefits:
- The proposal will see the land brought in to active management and a development that will be complementary to the adjoining habitats of Ancient Woodland and Heathland;
  - The site has capacity to deliver burials for an estimated period of 200 years, thus any development will be phased, incremental, therefore reducing impacts on habitat;
  - The site will require a SuDS scheme, and further planting of native provenance vegetation to boundaries and further landscape plantings, all of which will contribute to biodiversity with appropriate planning and control, and should provide habitat connectivity; and
  - The regulation around ground water and burials makes it difficult to find and establish suitable new burial space within the borough, and one that will comply with other planning policies. This site has been assessed as the most viable site in regard of these factors.

## A24, Slyfield Area Regeneration Project

### Summary

- 11.6.3 In response to the Inspector's queries, this paper outlines the background to the Slyfield Area Regeneration Project.
- 11.6.4 The Council highlight the support provided by Surrey County Council and Thames Water in progressing the initial agreements required to unlock the regeneration proposals.
- 11.6.5 Consistent with national policy, the Local Plan seeks to meet the allocation for a mixed-use redevelopment site under Policy A24.
- 11.6.6 The Council has tested the infrastructure timescales and considers the delivery programme to be effective, realistic and achievable within the plan period.

### Background

- 11.6.7 The site (40 ha) is owned principally by Guildford Borough Council (22 ha) and Thames Water with Surrey County Council having a minority interest. Existing land uses are: sewage treatment works, former landfill site, council depot, county council waste facility, community hall and allotments.
- 11.6.8 This is a mixed use site allocated for:
  - Approximately 1,500 homes of which 1,000 homes (C3) will be delivered within the plan period
  - 6 gypsy and traveller pitches
  - Approximately 6,500 sq. m light industrial (B1c)/trade counters(B8)
  - New council waste management depot
  - New county council waste management facilities
  - New sewage treatment works
  - Community facilities

### Current Proposals

- 11.6.9 The masterplan comprises (i) 1,500 homes and local retail/community facilities, (ii) industrial units and new Guildford Borough Council (GBC) depot, (iii) Surrey County Council (SCC) waste facilities, (iv) new Thames Water (TW) sewage treatment works, and the provision of a new internal estate road (this has the benefit of full planning permission granted August 2016). A Development plan and programme is in place to achieve submission of the four planning applications by August 2019.
- 11.6.10 Delivery of the housing is dependent on relocating the three major facilities (sewage treatment works, SCC waste facility and GBC depot) to new sites.
- 11.6.11 Good progress has been made with Thames Water (TW) to agree the cost of the new sewage treatment works and negotiating the Development Agreement (DA), with

governance/completion of the DA scheduled for August 2018. Anticipated completion of the relocated facilities is December 2023.

- 11.6.12 Surrey County Council are progressing feasibility and detailed design of a new waste transfer station and community recycling centre and have programmed governance/approvals to be achieved in September 2018. Anticipated completion of the relocated facilities is July 2021.
- 11.6.13 Based on detailed discussions with its financial and property advisors together with key stakeholders, the Council considers the proposed mixed-use site allocation to be viable producing additional social and economic benefits.

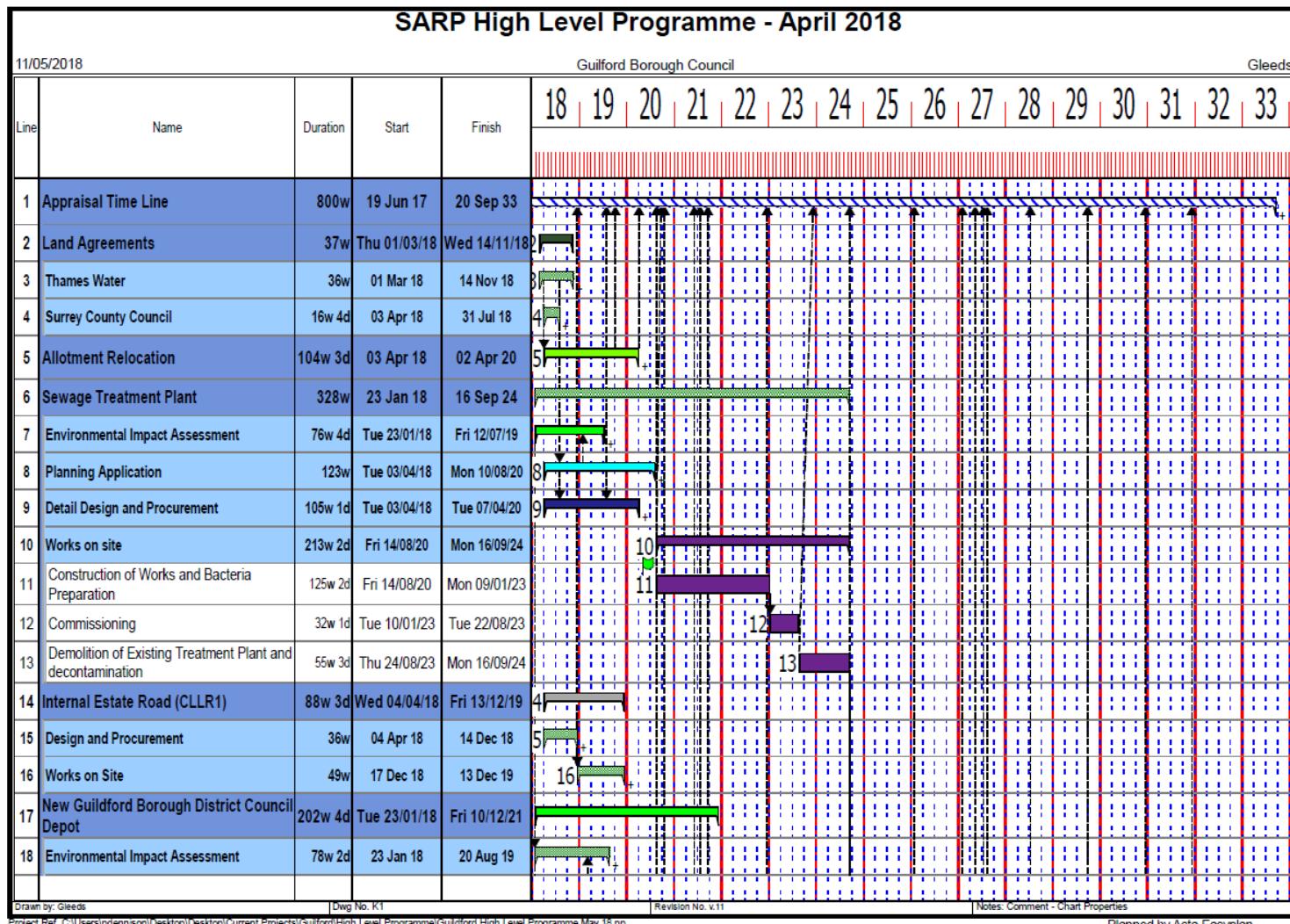
**11.7 *What are the key stages and points of infrastructure provision in respect of the site?***

11.7.1 The infrastructure required is as follows:

- New sewage treatment works (relocation of existing TW facility) planned for completion December 2023.
- New Guildford Borough Council depot (relocation) planned for completion September 2021.
- New Surrey County Council waste facilities (relocation) planned for completion July 2021.
- New internal estate road providing access to the new depot and waste facilities, planned for completion December 2019.
- Local Road Network improvements contributing to the sustainable movement corridor (post 2021).
- The Road Investment Strategy: for the 2015/16 – 2019/20 Road Period (Department for Transport, March 2015) (hereafter the RIS) provides funding for developing the A3 Guildford RIS scheme during Road Period 1 up to 2019/20 with delivery of this scheme anticipated to start in the next Road Period, namely Road Period 2 which covers the period between 2020/21 and 2024/25. At the time of submission, the advice of Highways England was that, if a scheme is approved with funding agreed, construction is unlikely to be start until 2024 at the earliest, with construction taking 2½ years to 2027.
- The housing element (1000 homes by 2034) of the SARP project has been deliberately back-loaded towards the end of the plan period to reflect the need for infrastructure to be delivered first.

**11.8 *Given the need for major infrastructure interventions, is the timing and scale of the anticipated delivery from this site realistic?***

- 11.8.1 The Council have taken programme advice from its advisor, Gleeds, and are satisfied the timing and scale of delivery is realistic and achievable. Further detail is included below (Figure 11.4).



*Figure 11.4 – SARP high level programme*

## **11.9 How are the infrastructure costs to be funded?**

### **11.9.1 Current funding proposals are as follows:**

- Homes England loan facility of £90m (secured in principle).
- LEP grant funding of £7.5m under Local Growth Fund (LGF) round 3 to facilitate necessary proprietary groundworks (provisionally allocated, subject to approval of full Business Case to be submitted 2018/19).
- Homes England grant funding of £51m under the forward funding stream of the Housing Infrastructure Fund. (Progressing through co-development phase).
- LEP funding £1m towards internal estate road under LGF round 2.
- Guildford Borough Council capital.
- Receipts from residential plot sales to developers.

## **11.10 What potential impact would the costs of infrastructure have on viability, deliverability and the provision of affordable housing on the site?**

11.10.1 The Council's holistic approach to infrastructure delivery and the detailed viability study has shown it may only be possible to deliver 35% of the homes as affordable, however this still equates to 443 new affordable homes that would otherwise not be delivered within the plan period. It is further noted that, whilst viability is weaker on the Slyfield strategic site mainly because of the significant costs involved in relocating the sewage works,<sup>2</sup> the Council's most recent Local Plan viability evidence<sup>3</sup> does indicate viability for the site. It is acknowledged though that further abnormal site costs above those taken into account in this study would mean that the 40% affordable housing threshold might not be met.

### A25, Gosden Hill Farm, Merrow Lane, Guildford

## **11.11 Is the plan justified in referring to an all-movements junction, park and ride, and land being "potentially required"?**

11.11.1 The Submission Local Plan includes the following 'requirements' for Policy A25:

- "(2) Any proposals for the development of the site should have regard to the potential opportunity to provide an all movements junction of the A3 trunk road with the A3100 London Road, the B2215 London Road and the A247 Clandon Road. Land could potentially be required for the provision of a connector road to the B2215 London Road/A247 Clandon Road
- (3) Land and park and ride facility of a sufficient scale as required by projected demand and in order to operate without public subsidy in perpetuity"

---

2 See Guildford Borough Council, Local Plan and CIL Viability Study (2016), paragraph 5.4.12 (ref: GBC-LPSS-SD-030).

3 See the Guildford Local Plan Viability Update, 2017 (GBC-LPSS-SD-031).

11.11.2 The Council's justification for these two requirements are addressed in turn.

*Justification for requirement (2)*

11.11.3 The inclusion of the requirement in the plan ensures its consideration as part of the development management process for a future planning application.

11.11.4 There are two rationales for requiring a deliberative process of consideration of this requirement. These are:

- (i) That this process identifies that an all movements junction maintains flexibility for the post-plan period in order to facilitate future growth or transport strategies relating to this area of Guildford.
- (ii) That this process identifies that an all movements junction is required as part of the site promoter's strategy,

11.11.5 Accordingly, the Council considers that there are three alternative possibilities that could emerge from the deliberative process of consideration of this requirement in the development management process for a planning application for the site:

- (a) It is determined that the applicant's transport strategy for the development of the site mitigates its otherwise adverse material impacts and accordingly the potential opportunity cannot be required.
- (b) That whilst it is determined that the applicant's transport strategy for the development of the site mitigates its otherwise adverse material impacts and accordingly the potential opportunity cannot be required, nevertheless the applicant's proposals provide for the potential future realisation of a connector road on the site only in the event that it was – at a later stage – identified as necessary to allow for future development for the post-plan period or a future transport strategy for this area of Guildford borough. The applicant's proposal could, in theory, provide for the potential future realisation of the connector road on the site only by, for instance, laying out built development in such a way that a connector road could later be provided across the site or by providing a road of suitable standard or capable of being upgraded to a suitable standard across the site.
- (c) It is determined that the applicant's transport strategy requires the potential opportunity to be realised.

11.11.6 In terms of the second and third possibilities – identified as (b) and (c) above, the onward connection of the connector road could be achieved either by a new road and bridge to that section of the B2215 London Road to the north of the A3 or by a new road to the A247 Clandon Road. In either case third party land would be required.

*Justification for requirement (3)*

Traffic impacts in Burpham:

11.11.7 The Guildford Borough Proposed Submission Local Plan "June 2016": Strategic Highway Assessment Report (Surrey CC, June 2016) (hereafter the SHAR 2016) is a technical report on the strategic highway assessment of the spatial strategy in the

Regulation 19 Local Plan (2016). It represents a robust “worst case” in terms of transport demand and supply assumptions, as it does not assess and therefore does not account for the mitigation; including the potential for modal shift, and the new and improved sustainable transport choices provided by the rail, bus and active modes schemes included in the Regulation 19 Local Plan (2016) and makes no allowance for any internalisation of trips within the larger sites.

- 11.11.8 The SHAR 2016 does not allow for the mitigation provided by the proposed Park and Ride facility at Gosden Hill Farm.
- 11.11.9 A comparison of scenarios 1 and 2 – the latter which adds in the Regulation 19 Local Plan (2016) development quantum but without the vehicular link for Gosden Hill Farm or any of the key highway schemes in the Local Plan – forecasts that the A3100 London Road in Burpham would experience significantly higher traffic flows with Regulation 19 Local Plan (2016) growth in the morning peak, around 45% higher in Scenario 2 (Table 4.3 in SHAR 2016).
- 11.11.10 When the vehicular link to the Gosden Hill Farm site, as realised by requirement (1) for the site (scheme SRN4), which includes a new southbound on-slip to the A3, is introduced in Scenario 3, the SHAR 2016 forecasts increased traffic through parts of Burpham, partly as a result of new development traffic but also partly as a result of drivers re-routing to make use of the new A3 on-slip (paragraph 4.7.6 in SHAR 2016). The additional pressure on New Inn Lane and the A3100/B2234 roundabout junction, adjacent to Aldi is noted (paragraph 4.7.7 in SHAR 2016).
- 11.11.11 The above findings from the SHAR 2016 indicate that, in the absence of mitigation, which is proposed to be provided by the rail, bus and active modes schemes included in the plan, there would be significant adverse traffic impacts in Burpham as a result of Local Plan development. (It should be noted that the Gosden Hill Farm site is not assessed separately from other Local Plan development).

Site promoter's transport strategy:

- 11.11.12 Throughout the plan-making cycle, the site promoter, Martin Grant Homes, has identified the provision of a park and ride facility as part of their transport strategy for the Gosden Hill Farm site.
- 11.11.13 The context is that the approach to Guildford on the A3 southbound is a current ‘gap’ in the park and ride network for Guildford that could provide an alternative option for drivers on the A3 travelling southbound with destinations in Guildford town centre. With this said, the park and ride facility adjacent to the Guildford Spectrum Leisure Complex already provides, to some degree, for this demand.
- 11.11.14 The Council, working with partners Surrey County Council, accepts the potential benefits of the provision of the park and ride facility at Gosden Hill Farm in that it will allow new vehicular trips generated by the development to use the ‘headroom’ on the highway networks provided by the interception of existing trips by the park and ride facility. In addition, it is anticipated that the headroom created on the A3100 will

assist with the provision of the eastern route section of the Sustainable Movement Corridor that is proposed in the Infrastructure Delivery Plan and set out as Requirement 4 in Policy A25.

- 11.11.15 The proviso, contained in requirement (3), is that the facility is “of a sufficient scale as required by projected demand and in order to operate without public subsidy in perpetuity”. The rationale for this proviso is that that the operation of the park and ride facility will be an element of the mitigation package for the site, facilitating its delivery, and therefore it is considered that the developer should design the scheme such that it is able to operate without public subsidy.

**11.12 *Is the delivery trajectory on this site affected by any of the A3 improvement proposals?***

- 11.12.1 The Submission Local Plan’s spatial strategy and key infrastructure schemes, as included in the Infrastructure Schedule, have been planned together and are interdependent in various ways. In short, the spatial strategy as proposed is dependent on the key infrastructure schemes as proposed.
- 11.12.2 Specifically, as concerns Gosden Hill Farm, the delivery trajectory for the site, as identified in the Housing Delivery and Transport topic papers (December 2017), is consistent with the assumed delivery of A3 improvements.
- 11.12.3 The Study of Performance of A3 Trunk Road Interchanges in Guildford Urban Area to 2024 Under Development Scenarios (Mott MacDonald, April 2018)<sup>4</sup> assesses the impacts of mainline queuing resulting from blocking back of traffic exiting at diverge junctions in the peak periods and the operation of merging and diverging at junctions in the peak periods. 2024 is the assumed earliest date for the start of construction of the A3 Guildford (A320 Stoke interchange junction to A31 Hog’s Back junction) scheme (hereafter the A3 Guildford scheme), as mandated by the Government’s Road Investment Strategy: for the 2015/16 – 2019/20 Road Period (Department for Transport, March 2015) (hereafter the RIS). The overall conclusion of the report is that, whilst recurrent congestion will continue to be experienced, traffic from the Submission Local Plan allocations should not have a significant detrimental impact on the operation of the A3 through the Guildford urban area.
- 11.12.4 Whilst a significant detrimental impact is avoided with the proposed trajectory, the assessment does highlight the potential impact of planned development in the early years on the operation of the A3 through Guildford. For instance, a notable detrimental impact on the A3 Off-slip at Stoke Junction during peak hours is forecast (Table 19) and whilst worsening of performance at other A3 junctions is small, junction performance – in absolute terms – remains a significant issue, for instance at the A3 Off-slip at Dennis Junction and the A3 Off-slip at Cathedral with both experiencing degrees of saturation exceeding 90% during the morning peak hour.

---

<sup>4</sup> Submission document references GBC-LPSS-SD-040-RevB and GBC-LPSS-SD-040-RevB-a.

- 11.12.5 It should be noted that the Mott MacDonald assessment is limited to the trajectory proposed in the Submission Local Plan. Further work would be required to assess the impacts of accelerated delivery on the Gosden Hill Farm and other sites and/or new sites.
- 11.12.6 The inspector will be mindful of Highways England's concerns regarding the impact of planned development on the Strategic Road Network. At the time of writing, the Council is actively engaged with Highways England in preparing a Statement of Common Ground which, amongst other matters, seeks to reach a common position on the relationship of the trajectory of planned development in the earlier years of the plan with the targeted improvements on the Strategic Road Network and schemes on the adjacent Local Road Network, in the period in advance of the A3 Guildford scheme.
- 11.12.7 The Council acknowledges that there are non-A3 transport mitigation measures for Gosden Hill Farm that could be accelerated. Such a strategy could, in theory, release additional 'headroom' on the highway networks for new vehicular trips generated by the site and enable additional development to come forward during the period between 2024 and 2027, which is the period during which, at the earliest, Highways England will be constructing their A3 Guildford RIS scheme. In spite of this, given the complexity of delivering this scheme and the likely impact that construction will have on the already constrained capacity A3, the Council do not consider it realistic that the Gosden Hill Farm site would be able to deliver at the pace they would otherwise.
- 11.12.8 Based on our discussions to date with the site promoter for Gosden Hill Farm, we are not sufficiently confident that they would be minded to invest additional developer monies in funding the acceleration of identified or new transport schemes to facilitate additional early delivery, when the prospect of a Government-funded A3 Guildford RIS scheme is forthcoming.
- 11.12.9 In addition, given the risks of delay and/or significant degradation in the form of the A3 Guildford RIS scheme (discussed in response to Question 4.2), and the complexity of delivering an A3 Guildford RIS scheme, Highways England may seek to impose Grampian conditions to prevent or limit accelerated delivery at Gosden Hill Farm during the period of the scheme's construction.
- 11.13 Are there local level exceptional circumstances that justify the release of this site from the Green Belt?**
- 11.13.1 This response should be read alongside the Council's response to Question 8: Green Belt (appendix 5) which provides more detail of the exceptional circumstances. The local level exceptional circumstances that justify this site include the limited harm that this Guildford urban extension would have on the wider Green Belt given its location on a medium sensitivity land parcel. It is also a strategic site allocation that is able to accommodate a mix of uses including traveller accommodation and makes a significant contribution towards meeting identified needs for housing and employment. Its scale also enables the delivery of a significant package of supporting infrastructure which are necessary to make the development acceptable, but which

will also have wider benefits. This includes provision of and/or contributions towards a new Park and Ride, a rail station, a secondary school and the Sustainable Movement corridor.

**11.14 *In combination with the allocations near the A3 at Send (see 11.34 below), is there a risk of a significant diminution of the Green Belt in this locality? Can the perception of the eastward sprawl of the wider Guildford urban area along the A3, and the encroachment into the undeveloped gaps, be avoided?***

- 11.14.1 Whilst the eastern extent of the site A25 may appear physically to extend the Guildford urban area boundary quite close to the boundary of site A58 which will be new western extent to Send Marsh/ Burnt Common, this is not the case when on the ground. Coalescence between settlements can be perceived or actual, and physical or visual. In this instance, the Council do not consider that the developments proposed would lead to a perceived or visual coalescence. It is inevitable that an urban extension of approximately 2,000 homes will lead to encroachment into the countryside and an extension to the built up area. This is clearly evidenced in the Green Belt and Countryside Study which assesses both land parcels as contributing positively to both of the following Green Belt purposes:
- Purpose 1 - Safeguarding the Countryside from Encroachment
  - Purpose 3 - Restrict Sprawl of Urban Areas
- 11.14.2 However, this needs to be balanced against other considerations including the sustainability benefits of this site and its location as an urban extension. The Council considers that the requirements set by site policy A25 will ensure that the boundary treatment at the edge of the site responds both to its context and to any issues of perceived merging with nearby Send Marsh. These are:
- A25(23) - Sensitive design at site boundaries that has significant regard to the transition from urban to greenfield
  - A25(24) - In order to ensure that sufficient separation is maintained between the site and Send Marsh, part of the site adjacent to the A3, will need to remain open as a green buffer
- 11.14.3 This open buffer along the eastern most extent of the site along the A3 combined with significant new planting proposed as part of the emerging masterplan will further help to contain the new development and prevent any perception of unrestricted sprawl and coalescence. The Council will also seek to promote the integration of Green Infrastructure (including amenity green space and open space/recreation) to the area of the site most visible from the A3, to further reduce visual prominence.
- 11.14.4 The Council acknowledges that part of A25 Gosden Hill will be seen from the A3, where the land rises ahead, however it also considers there are opportunities to positively address this through the detailed design stage. This will provide a partial view of the site and an opportunity for high quality design and architecture. However, views of the majority of the site are restricted with a significant part of the site screened by topography and existing woodland (Cotts Wood). Therefore the Council do not consider that there will be a perception of unrestricted sprawl from the

development. The extent of the new urban area will be well contained by a new defensible Green Belt boundary.

- 11.14.5 Moving northwards along the A3 towards Send Marsh, site allocation A58 is located on the opposite side of the A3 to Gosden. Site A58 is very well screened through existing tree belts and pockets of woodland. Given the allocation is for industrial uses which tend to be fairly low rise buildings, it is unlikely that the proposed development, as is already the case with the existing warehouse, would be seen from the A3.
- 11.14.6 Moving further northwards, the next allocation is site allocation A43. Whilst open views of this site are currently visible from the A3, the context of this area will change significantly once the new A3 slips are built. A new landscape bund is proposed as part of the development of A43 to provide a visual and acoustic buffer between it and the new slips/A3.

#### A26, Blackwell Farm

##### **11.15 *Can access to this site from the south be successfully achieved from the A3 / A31 without significant detriment to the landscape?***

###### Summary

- 11.15.1 The Council commissioned Mott MacDonald to prepare horizontal and vertical feasibility design drawings alongside undertaking junction capacity assessment work for the new junction with A31. The proposed access design by Mott MacDonald demonstrates that a suitable access to Blackwell Farm from the A31 can be contained within the boundary defined for the site in the Plan.
- 11.15.2 The Council has commissioned MacFarlane Associates to investigate the impact on landscape. Their advice is that the Council's design (prepared by Mott MacDonald) does not result in a permanent significant detriment to the landscape.

###### Horizontal and Vertical Layout of proposed access from A31

- 11.15.3 The Council commissioned Mott MacDonald to investigate further the proposed access to the site from the A31. The report considers the facets of providing a new junction access and road from the A31 to serve the proposed development site at Blackwell Farm. The report is entitled "A31 Blackwell Farm Link Road Highway Access Feasibility Design" (Mott MacDonald, May 2018) and is included as Question 11: Appendix 1 to this answer. The report assesses the likely civil and transportation engineering constraints of accessing the site with respect to junction capacity, highways alignment and earthworks imposition. The report also investigates a new bridge to traverse the northbound on-slip from the A31 to the A3.
- 11.15.4 The report demonstrates that access to the proposed development site is Department for Transport Design Manual for Roads and Bridges (DMRB) design standards compliant and these have been applied for the A31 signalised junction layout and initial extent of the access road alignment.

- 11.15.5 The proposed site access junction with the A31 offers sufficient capacity on the A31 for proposed development for the full plan period with a forecast year of 2031. Peak hour traffic demand at the new junction was calculated using data from Surrey County Council's SINTRAM model as prepared for the Guildford Borough Proposed Submission Local Plan "June 2016": Strategic Highway Assessment Report (Surrey County Council, June 2016) (hereafter the SHAR 2016), supplemented by data to represent a new secondary school on the site. The report recommends that the existing 50 mph speed limit on the section of the A31 adjacent to the site access is reduced to 40 mph.
- 11.15.6 The mitigation of a retaining wall included as part of the design would minimise the impact on the tree line corridor of the existing access track.
- 11.15.7 The proposed access design by Mott MacDonald demonstrates that a suitable access to Blackwell Farm from the A31 can be contained within the boundary defined for the site in the Plan.
- 11.15.8 The University of Surrey considers that an alternative design provides more flexibility and therefore a larger area of green belt should be removed to provide for the access. The Council does not consider that this is justified and therefore does not support the University of Surrey's proposal.

#### Impact on Landscape

- 11.15.9 The Council has commissioned a landscape consultant, MacFarlane Associates who have assessed the potential impact of the Mott MacDonald layout and the University of Surrey's layout on the landscape.
- 11.15.10 The Landscape Impact Report is attached as Appendix 11.2. The conclusions of the report are that the Mott MacDonald proposal connects to the landscape lines closer than the University of Surrey's proposal and will be further concealed from key vantage points due to the topography of the land. However, the majority of the tree removal will be within the boundaries of the AONB.
- 11.15.11 The University of Surrey's proposal will have more visual impact as the road curves away from the tree line, but the route's tree removal to cross Down Place is outside of the AONB boundary.
- 11.15.12 The report identifies a number of mitigation measures and recommends that enhancement actions to improve the quality, extent or value of the landscape are implemented as part of the scheme.
- 11.15.13 In summary, the Council considers that there will be no permanent significant detriment to the landscape and that the route chosen by the Council minimises this impact on the landscape.

## **11.16 Where would the traffic impacts occur and how would they be mitigated?**

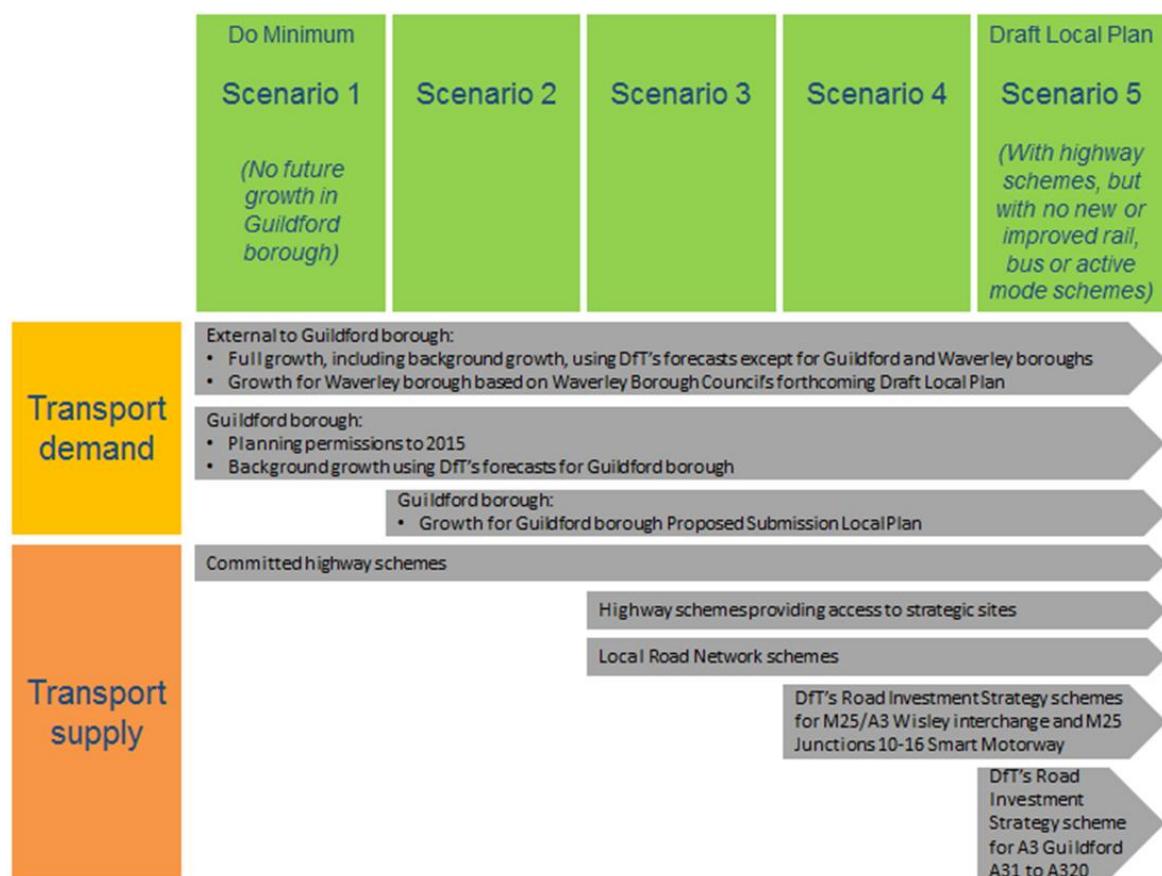
### Summary

- 11.16.1 Evidence to answer the question has been extracted from Surrey County Council's SINTRAM model as prepared for the SHAR 2016.
- 11.16.2 The impacts have been identified by assessing a cordon around the proposed Blackwell Farm site in order to determine traffic impacts in terms of vehicle flows for different scenarios assessed in the SHAR 2016.
- 11.16.3 The percentage of traffic that is related to Blackwell Farm is relatively small in Scenario 3 AM and PM peak periods with the most significant increase occurring on the section of the A31 west of the proposed site access junction before it connects with the A3 slip roads. However, whilst this is significant in percentage terms it is a relatively small increase in traffic flows with an average increase per minute of less than five vehicles. This also applies to Egerton Road in that the percentage increases are relatively high but the absolute increases are less than three vehicles per minute in total.
- 11.16.4 The Council considers that with the transport Requirements (1, 2, 3, 4, 5, 6, 7 and 8) in Policy A26 and those schemes set out in the Infrastructure Schedule provide sufficient transport measures and flexibility for the site promoter to be able to mitigate the impacts identified. (See Question 4: Appendix 5 for figure showing the relationship between the phasing of developments and transport schemes. This is an update to Figure A8-B from the Transport topic paper (December 2017).)
- 11.16.5 The SHAR 2016 provides a robust 'worst case' assessment and the site's location and its potential to connect into existing and to implement proposed sustainable transport measures will limit further the transport impacts of the site.

### Traffic Impacts

- 11.16.6 Evidence to answer the question has been extracted from Surrey County Council's SINTRAM model as prepared for the SHAR 2016. It should be noted that the trip rates and distribution used in the SHAR 2016 may differ from those that may be used in a detailed Transport Assessment and Travel Plan undertaken specific to the site at the planning application stage. Nevertheless, the analysis provides a general answer to the Inspector's question.
- 11.16.7 We also consider that the SHAR 2016 report provides a robust 'worst case' assessment as it uses generic trip rates and does not take account of the impact of sustainable transport measures which is a significant part of the policy and infrastructure requirements for the Plan and for Policy A26.
- 11.16.8 Surrey County Council provided to the Council further analysis for Scenarios 2, 3 and 5. These scenarios are set out in detail in the SHAR at Section 3.2. Figure 11.5 shows the scenarios tested in the SHAR 2016.

Figure 11.5: Outline of scenarios in SHAR 2016



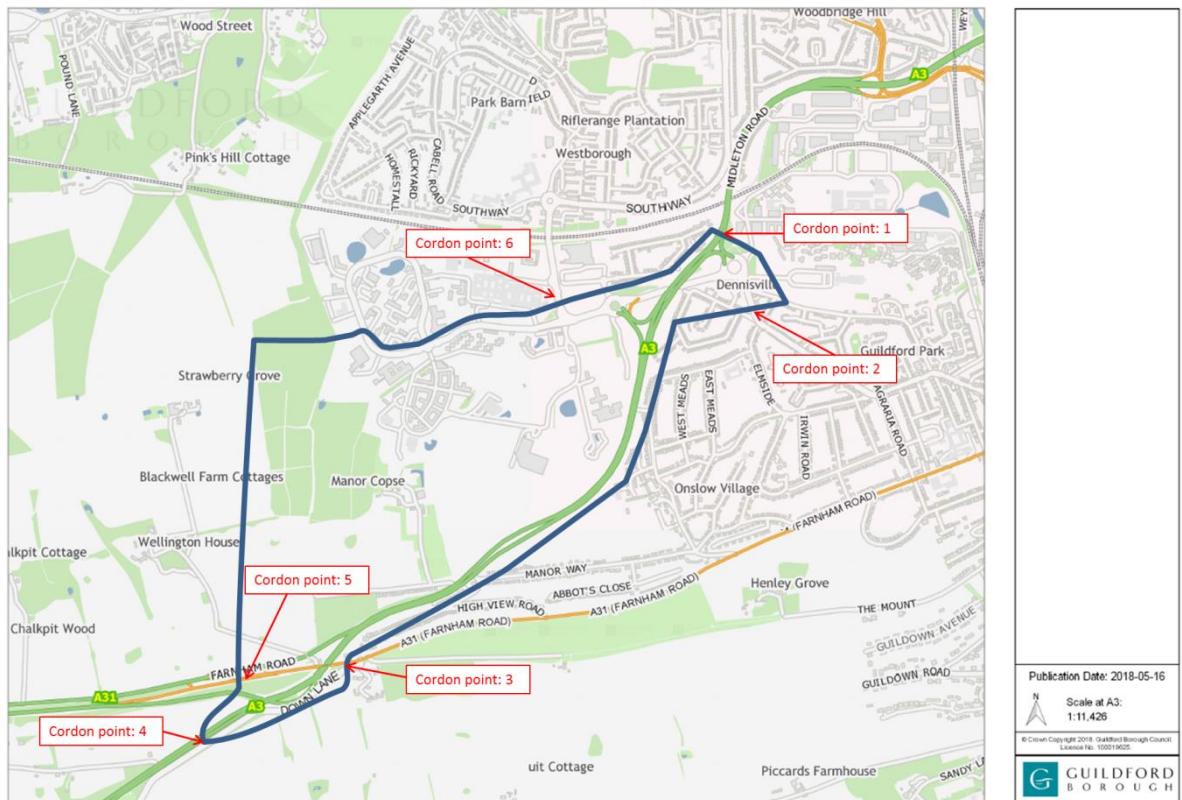
Source: Figure 3.1b in SHAR 2016

- 11.16.9 With regards to the Blackwell Farm site, it should be noted that the Scenario 2 traffic model only has a link connection to the A31 adjacent to Down Place and therefore all site traffic comes out onto the A31 without a junction layout specified. In Scenario 3, the traffic model reflects what is proposed in the Local Plan Policy A26 in that it includes two points of access, one from A31 and the other from Gill Avenue. In terms of mitigation that is relevant to the Blackwell Farm policy, Scenario 3 includes (set out in detail in the SHAR 2016 at paragraph 3.2.3):
- A3 with Egerton Road roundabout improvements (scheme LRN2 in the Infrastructure Schedule);
  - A31 Hog's Back with proposed Blackwell Farm development access road facilitated by signals (scheme LRN3);
  - Proposed Blackwell Farm development access road (with controlled access for employees at the Surrey Research Park, Manor Park and Royal Surrey County Hospital) (scheme LRN4);
  - A31 Hog's Back with B3000 Puttenham Hill junction improvements (part of scheme LRN17).

- 11.16.10 A cordon was drawn by the Council showing the roads of interest surrounding the Blackwell Farm site allocation and Surrey County Council provided information on

traffic flows relating to the site and overall flows. The cordon is provided below at Figure 11.6.

**Figure 11.6 – Cordon used by Surrey County Council to identify roads affected by the Blackwell Farm allocation traffic impact**



11.16.11 The following traffic flows have been provided by Surrey County Council relating to the scenarios described above from the SHAR 2016:

**Table 11.1 – AM Peak Average Hour**

Flows crossing cordon point, Scenario 2						
Average AM peak hour						
Cordon Point		Links	Link Ref	Total Flow	Blackwell Farm related trips	Percentage of Flow
1	1a	A3 northbound, north of Cathedral junction	15512, 2	4321	124	2.9%
	1b	A3 southbound, north of Cathedral junction	15512, 1	4284	45	1.1%
2	2a	The Chase, to Guildford t/c	15504, 1	659	71	10.8%
	2b	The Chase, from t/c	15504, 2	353	167	47.3%
3	3a	A31 Farnham Road, eastbound,	15629, 2	1031	255	24.7%
	3b	A31 Farnham Road, westbound,	15629, 1	623	90	14.4%
4	4a	A3 southbound,south of Down Lane merge	15649, 2	1909	75	3.9%
	4b	A3 northbound, south of A31 merge	15649, 1	2806	2	0.1%
5	5a	A31 Hog's Back, westbound, east of A3 slip merge	15651, 1	845	386	45.7%
	5b	A31 Hog's Back, eastbound	15651, 2	2648	225	8.5%
6	6a	Egerton Road, northbound	15917, 1	838	4	0.5%
	6b	Egerton Road, southbound	15917, 2	469	25	5.3%
				20786	1469	7.1%

Flows crossing cordon point, Scenario 3						
Average AM peak hour						
Cordon Point		Links	Link Ref	Total Flow	Blackwell Farm related trips	Percentage of Flow related to Blackwell
1	1a	A3 northbound, north of Cathedral junction	15512, 2	4437	190	4.3%
	1b	A3 southbound, north of Cathedral junction	15512, 1	4236	42	1.0%
2	2a	The Chase, to Guildford t/c	15504, 1	559	17	3.0%
	2b	The Chase, from t/c	15504, 2	191	0	0.0%
3	3a	A31 Farnham Road, eastbound,	15629, 2	803	10	1.2%
	3b	A31 Farnham Road, westbound,	15629, 1	213	10	4.7%
4	4a	A3 southbound,south of Down Lane merge	15649, 2	2086	63	3.0%
	4b	A3 northbound, south of A31 merge	15649, 1	2805	19	0.7%
5	5a	A31 Hog's Back, westbound, east of A3 slip merge	15651, 1	443	277	62.5%
	5b	A31 Hog's Back, eastbound	15651, 2	2502	162	6.5%
6	6a	Egerton Road, northbound	15917, 1	804	118	14.7%
	6b	Egerton Road, southbound	15917, 2	439	80	18.2%
				19518	988	5.1%

Flows crossing cordon points, Scenario 5					
Average AM peak hour					
Cordon Point	Links	Link Ref	Total Flow	Blackwell Farm related trips	Percentage of Flow related to Blackwell
1	1a A3 northbound, north of Cathedral junction	15512, 2	5569	211	3.8%
	1b A3 southbound, north of Cathedral junction	15512, 1	4592	44	1.0%
2	2a The Chase, to Guildford t/c	15504, 1	342	0	0.0%
	2b The Chase, from t/c	15504, 2	178	0	0.0%
3	3a A31 Farnham Road, eastbound,	15629, 2	760	27	3.6%
	3b A31 Farnham Road, westbound,	15629, 1	208	8	3.8%
4	4a A3 southbound,south of Down Lane merge	15649, 2	2203	63	2.9%
	4b A3 northbound, south of A31 merge	15649, 1	3250	23	0.7%
5	5a A31 Hog's Back, westbound, east of A3 slip merge	15651, 1	1503	280	18.6%
	5b A31 Hog's Back, eastbound	15651, 2	2733	160	5.9%
6	6a Egerton Road, northbound	15917, 1	775	94	12.1%
	6b Egerton Road, southbound	15917, 2	461	78	16.9%
			22574	988	4.4%

- 11.16.12 The above summary of average morning peak flows shows that the proposed mitigation for Blackwell Farm that was assessed in the SHAR 2016 reduces traffic flows by 1,268 vehicles through the cordon between scenario 2 and 3. This is partly due to the double counting of development trips because they are observed for example in Scenario 2 on A31 Farnham Road and The Chase as they access the A3 north of Cathedral junction and vice versa. Scenario 5 results in an increase in flows through the cordon but this increase is primarily linked to the increased capacity of the A3 and therefore the use of it due to the improvements proposed in the Road Investment Strategy: for the 2015/16-2019/20 Road Period (Department for Transport, March 2015).
- 11.16.13 It should also be noted that the percentage of traffic that is related to Blackwell Farm is relatively small in Scenario 3 AM peak period with the most significant increase occurring on the section of the A31 west of the proposed site access junction before it connects with the A3 slip roads travelling westbound. However, whilst this is significant in percentage terms it is a relatively small absolute increase in traffic flows with an average increase per minute of less than five vehicles. This also applies to Egerton Road in that the percentage increases are relatively high but the absolute increases are less than three vehicles per minute in total.

**Table 11.2 – PM Peak Average Hour**

Flows crossing cordon point, Scenario 2		Average PM peak hour		Blackwell Farm related trips	Percentage of Flow
Cordon Point	Links	Link Ref	Total Flow		
1	1a A3 northbound, north of Cathedral junction	15512, 2	4351	45	1.0%
	1b A3 southbound, north of Cathedral junction	15512, 1	4425	148	3.3%
2	2a The Chase, to Guildford t/c	15504, 1	933	179	19.2%
	2b The Chase, from t/c	15504, 2	296	57	19.3%
3	3a A31 Farnham Road, eastbound,	15629, 2	667	102	15.3%
	3b A31 Farnham Road, westbound,	15629, 1	1397	214	15.3%
4	4a A3 southbound,south of Down Lane merge	15649, 2	3146	57	1.8%
	4b A3 northbound, south of A31 merge	15649, 1	2190	0	0.0%
5	5a A31 Hog's Back, westbound, east of A3 slip merge	15651, 1	1263	334	26.4%
	5b A31 Hog's Back, eastbound	15651, 2	2511	319	12.7%
6	6a Egerton Road, northbound	15917, 1	348	10	2.9%
	6b Egerton Road, southbound	15917, 2	1097	2	0.2%
			22624	1467	6.5%

Flows crossing cordon point, Scenario 3		Average PM peak hour		Blackwell Farm related trips	Percentage of Flow related to Blackwell
Cordon Point	Links	Link Ref	Total Flow		
1	1a A3 northbound, north of Cathedral junction	15512, 2	4371	70	1.6%
	1b A3 southbound, north of Cathedral junction	15512, 1	4653	163	3.5%
2	2a The Chase, to Guildford t/c	15504, 1	815	0	0.0%
	2b The Chase, from t/c	15504, 2	234	0	0.0%
3	3a A31 Farnham Road, eastbound,	15629, 2	447	8	1.8%
	3b A31 Farnham Road, westbound,	15629, 1	1013	20	2.0%
4	4a A3 southbound,south of Down Lane merge	15649, 2	3056	52	1.7%
	4b A3 northbound, south of A31 merge	15649, 1	2211	39	1.8%
5	5a A31 Hog's Back, westbound, east of A3 slip merge	15651, 1	1035	236	22.8%
	5b A31 Hog's Back, eastbound	15651, 2	2058	236	11.5%
6	6a Egerton Road, northbound	15917, 1	524	124	23.7%
	6b Egerton Road, southbound	15917, 2	1143	45	3.9%
			21560	993	4.6%

Flows crossing cordon points, Scenario 5		Average PM peak hour		Blackwell Farm related trips	Percentage of Flow related to Blackwell
Cordon Point	Links	Link Ref	Total Flow		
1	1a A3 northbound, north of Cathedral junction	15512, 2	4847	80	1.7%
	1b A3 southbound, north of Cathedral junction	15512, 1	5410	133	2.5%
2	2a The Chase, to Guildford t/c	15504, 1	309	0	0.0%
	2b The Chase, from t/c	15504, 2	218	0	0.0%
3	3a A31 Farnham Road, eastbound,	15629, 2	410	9	2.2%
	3b A31 Farnham Road, westbound,	15629, 1	743	30	4.0%
4	4a A3 southbound,south of Down Lane merge	15649, 2	3563	59	1.7%
	4b A3 northbound, south of A31 merge	15649, 1	2307	38	1.6%
5	5a A31 Hog's Back, westbound, east of A3 slip merge	15651, 1	1804	227	12.6%
	5b A31 Hog's Back, eastbound	15651, 2	2079	230	11.1%
6	6a Egerton Road, northbound	15917, 1	432	115	26.6%
	6b Egerton Road, southbound	15917, 2	1166	72	6.2%
			23288	993	4.3%

- 11.16.14 The above summary of average evening peak flows shows a similar trend to the morning peak results in that the proposed mitigation for Blackwell Farm that was assessed in the SHAR 2016 reduces traffic flows by 1064 vehicles through the cordon between scenario 2 and 3. Again, this is partly due to the double counting of development trips because they are observed for example in Scenario 2 on the A31 Farnham Road and The Chase as they access the A3 north of Cathedral junction and vice versa. Scenario 5 results in an increase in flows through the cordon but again this increase is primarily linked to the increased capacity of the A3 and therefore the use of it due to the improvements proposed in the Road Investment Strategy.
- 11.16.15 It should also be noted that the percentage of traffic that is related to Blackwell Farm is relatively small in Scenario 3 PM peak period with the most significant increase occurring on the section of the A31 west of the proposed site access junction before it connects with the A3 slip roads travelling westbound and eastbound. However, whilst this is significant in percentage terms it is a relatively small increase in traffic flows with an average increase per minute of less than four vehicles in each direction. This also applies to Egerton Road in that the percentage increases are relatively high but the absolute increases are less than three vehicles per minute in total.

*Impacts through Compton*

- 11.16.16 The Council is also aware that objectors have raised the impact of Blackwell Farm along the B3000 through Compton. The analysis of trips generated by Blackwell Farm show that on this section of B3000 through Compton village during the average AM peak hour period the additional trips would be 34 vehicles in the hour and in the average PM peak hour they would be 12 vehicles in the hour.

Transport Mitigation

- 11.16.17 In addition to the transport measures set out above and assessed in the SHAR 2016, the Inspector should be mindful of the site's location adjacent to the Surrey Research Park, Royal Surrey County Hospital and Manor Park, which is part of the University of Surrey. The Council's view is that through good design the site will be able to access and enhance substantially the existing walking, cycling and public transport facilities that connect through to Guildford town centre and adjacent employment, retail and residential facilities. In addition, the Council has an ambitious plan to connect Guildford town centre to both urban extensions and also SARP through a Sustainable Movement Corridor.
- 11.16.18 The site is proposed to contain a new primary and secondary school. Access to these facilities by non-car modes of transport is a key benefit for this site and will minimise impacts on the Local Road Network.
- 11.16.19 The controlled link through to connect to the Surrey Research Park, Royal Surrey County Hospital and Manor Park will reduce the number of trips from the west having to currently access this area from the A3. The SHAR 2016 reports on these potential benefits in paragraph 4.7.5 (page 42). However, the report does acknowledge that

“Potentially the number of drivers attracted to use this access route could be somewhat higher as the model cannot accurately reflect the queuing that occurs on the nearside lane of the A31 as it approaches the merge with the A3.”

- 11.16.20 The Council agrees with Surrey County Council that the potential benefits in terms of reductions in A31 to A3 flows in the both directions during the peak periods and throughout the day could be more significant when a detailed assessment as part of a planning application is undertaken.
- 11.16.21 The Inspector is reminded that the Council’s Transport topic paper (December 2017) sets out how it is considered that Blackwell Farm and adjacent transport schemes will mitigate the impact of the development and result in a sustainable community. In particular, paragraphs 6.66, 6.75, 6.83 of the main text of the report and Appendices 4 (section 2), Appendix 7 and Appendix 8 provide commentary on the sustainable transport aspects related to the Blackwell Farm site allocation.
- 11.16.22 The Council considers that with the transport Requirements (1, 2, 3, 4, 5, 6, 7 and 8) in Policy A26 and those set out in the Infrastructure Schedule there is sufficient measures and flexibility for the site promoter to be able to mitigate the impacts identified above.
- 11.16.23 As has previously been noted, the SHAR 2016 provides a robust ‘worst case’ assessment and that the site’s location and its potential to connect into existing and implement proposed sustainable transport measures will limit further the transport impacts of the site.

**11.17 How would the wider landscape impacts of this development be mitigated, including impacts on views from the AONB?**

- 11.17.1 The Council has commissioned a landscape consultant, MacFarlane Associates who have assessed the wider landscape impacts of the development and how this can be mitigated. The Landscape Impact Report is attached as Appendix 11.3.
- 11.17.2 The assessment concludes that views from the AONB will be restricted to the ridge and northern slope of the Hog's Back. Within this location, the majority of the publicly accessible views will be from passing vehicles on the A31.
- 11.17.3 It also identifies that there are a number of Public Rights of Way within this zone of AONB, including one Bridleway, and views from these locations should be included within the Landscape Visual Impact Assessment prior to the submission of a planning application and to inform mitigation measures.
- 11.17.4 The report concludes that views in to the AONB will be affected from viewpoints within the development, and from the wider landscape which will overlook the development area. However the extent of the views from and in to the AONB would be reduced through the topography of the landscape. Mitigative planting measures will lessen views further and could be focussed to mitigate key viewpoints where necessary.
- 11.17.5 The report identifies the following mitigation measures to reduce the landscape and visual impact:
- Restricting the scale, notably height, of the development so it is in keeping with existing development
  - Buffer planting in key locations of sufficient maturity and species suitable to the context
  - Utilise topography to reduce views
  - Sensitive lighting design
  - Further analysis to inform detailed proposals

**11.18 What is the evidence for the need for the proposed amount of land and floorspace specifically as an extension to Surrey Research Park?**

- 11.18.1 This response should be read alongside the Council's response to Question 7.1. The existing Surrey Research Park is now fully occupied, extends to 28ha, comprises almost 65,000 sqm of employment floorspace and is home to approximately 110 companies. The opportunity to extend this Strategic Employment Site will enable the Council to build on its knowledge-based employment sector that is of regional significance. The Surrey Research Park is aligned with the key priorities identified by the Enterprise M3 LEP. The LEP's Strategic Economic Plan identifies Guildford as one of four growth towns which are key to driving economic growth across the Enterprise M3 area, and its objectives of being a 'Sci:Tech Corridor'.

- 11.18.2 The original outline planning permission for the Research Park included a restriction limiting use to “research, development and design activities, in any science, including social science, that is complementary to the activities of the University of Surrey”. This has ensured the site has remained focused on knowledge-based industry over the last thirty years. The University wish to retain this focus which supports the local economy. The strength of the Surrey Research Park is the specialist research and development offer, which is set in an attractive location, with good access to a well-qualified work force. It provides a unique facility in the wider South East and is estimated to contribute between £450m and £625 million to the regional economy. This type of specialist employment could not be provided elsewhere in the borough.
- 11.18.3 As part of the Council’s response to *Question 29: Employment* of the Inspector’s Initial Questions, a draft modification was proposed to remove reference to “complementary to the activities of the University of Surrey” on the basis it was too vague to allow an assessment and too restrictive. However Policy E4 continues to protect the site for business use comprising offices, research, development, design and innovation activities, in any science, including social science, falling within Use Classes B1 (a), (b) and (c). The Surrey Research Park is owned by the University of Surrey and they retain control over the leases granted. Given the specialist nature of the site outlined above, they wish to retain an element of restriction on the extended site and continue to build the cluster of knowledge based industries. There is also growing demand for small and medium enterprises, including incubator units for start-up businesses, which Policy E4 supports.
- 11.18.4 The Submission Local Plan includes an inconsistency in the floorspace of the extension to the research park. Policy E4, paragraph 4.4.41 states this will “provide a total capacity of around 35,000 sq m of additional floorspace, of which 30,000 sq m is expected to be delivered in the plan period”, whilst Site A26 allocates the site for approximately 30,000 sq m. A draft modification is proposed that amends Site A26 as follows:
- A26(3) – Approximately 35,000 sq m 30,000 sq m of employment (B1) on a 10-11 ha extension to the Surrey Research Park of which a minimum of 30,000 sq m will be delivered within the plan period and
- 11.18.5 In terms of land take, a critical part of the success of the research park is the high quality environment which is on offer with significant landscaping throughout the site. This landscaping feature will be continued in the extension. The current research park also consists of predominantly 2-storey buildings however there is the potential for 3-storey buildings on the extension which will help ensure that the land is used efficiently.

**11.19 Are there local level exceptional circumstances that justify the release of this site from the Green Belt?**

- 11.19.1 This response should be read alongside the Council’s response to *Question 8: Green Belt (appendix 5)* of the Inspector’s Initial Questions which provides more detail of the exceptional circumstances. The local level exceptional circumstances that justify this site include the limited harm that this Guildford urban extension would have on the

wider Green Belt given its location on a medium sensitivity land parcel. It is also a strategic site allocation that is able to accommodate a mix of uses including traveller accommodation and makes a significant contribution towards meeting identified needs for housing and employment. Its scale also enables the delivery of a significant package of supporting infrastructure which are necessary to make the development acceptable, but which will also have wider benefits. This includes provision of and/or contributions towards a rail station, a secondary school and the Sustainable Movement corridor.

#### A29, Land South and East of Ash and Tongham

##### **11.20 How would road traffic be handled from these sites, especially having regard to the railway line and the narrow lanes and streets?**

###### Summary

- 11.20.1 This answer sets out what the existing transport issues are in and around the Ash and Tongham area and how this contributes to existing rat-running problems on narrow lanes and streets in Ash and Tongham. It also discusses the safety issues that Network Rail has raised regarding the level crossing at Ash station.
- 11.20.2 The answer describes how the requirements in Policy A29 will address these issues in combination with measures set out in the Infrastructure Schedule.
- 11.20.3 The answer demonstrates that the Council has developed a clear and comprehensive set of measures to ensure that the development proposals will contribute towards addressing existing safety issues relating to the level crossing at Ash and will not result in additional development vehicles using inappropriate narrow lanes and streets. Indeed, it is the view of the Council that the measures set out in Policy A29 and in the Infrastructure Schedule will significantly improve the transport situation in Ash and Tongham over the Plan period.

###### Answer

- 11.20.4 Policy A29 contains a number of sites that stretch in a south-west to north-east band bounded by the A331/A31 to the south-west to the A323 Guildford Road to the north-east. The proposed allocation is for approximately 1,750 homes.
- 11.20.5 Issues related to the impact of additional development traffic on the narrow lanes and streets was identified as a potential issue a number of years ago and the Council has been working with Surrey County Council, the Enterprise M3 Local Enterprise Partnership, Network Rail, Government, and other stakeholders to address this issue. This is explained further in the response below.
- 11.20.6 There are currently issues with traffic rat-running through the narrow lanes and streets around Ash and Tongham and these are generally peak period issues created by drivers seeking to avoid congestion on the main roads that run through or border Ash and Tongham.

- 11.20.7 The main peak period transport issues in the area of Ash and Tongham can be broadly summarised as follows:
- i) There is congestion on the A31 Hogs Back during peak periods notably at the A31/A331 junction and in particular the exit from the A31 travelling westbound to enter the roundabout providing access to the A331. As a result, traffic often diverts off of the A31 at earlier junctions and rat-runs through the lanes and streets northbound to connect onto the A323 and then back onto the A331. This rat-running traffic uses The Street, Oxenden Road, White Lane, Poyle Road and Foreman Road;
  - ii) The level crossing on the A323 adjacent to Ash railway station is closed for approximately 20 minutes in every hour. Local traffic avoids the congestion created by the crossing being closed by rat-running along parallel east-west routes that bridge the railway lane to connect back onto the A323. In particular, traffic diverts off of the A323 at Grange Road, then travels along Foreman Road, Ash Green Road and then either Harpers Road or Wyke Lane to connect back onto the A323. These routes are also used in reverse by traffic travelling east-west;
  - iii) The A323/A331 roundabout junction is also busy during peak periods with delays extending onto the A323 back towards Ash. Some of the problems incurred at this junction are created by queuing traffic from a junction within Hampshire (A323/North Lane junction);
  - iv) East of Ash eastbound on the A323 Guildford Road, there is recurrent congestion and queuing back to Ash Hill Road and beyond particularly during the morning peak period created by capacity issues at the A323/Pirbright Road junction, alongside issues created by rat-running traffic forcing their way out onto A323 when turning right from Harpers Road and Wyke Lane.
- 11.20.8 With the level of growth proposed in the Ash and Tongham area, the Council has identified that the issues of peak period rat-running will be exacerbated and made severe by the potential for development related traffic to add to the existing traffic congestion and avoiding this by using the lanes and streets mentioned above. This is particularly relevant to the site allocations proposed adjacent to Foreman Road, Ash Green Road and Harpers Lane which depending on how their site accesses are located would by default use these routes.
- 11.20.9 In addition, as part of the consultation on the Regulation 19 Local Plan (2017), Network Rail raised safety concerns regarding the impact of Policy A29 on the operation of the level crossing at Ash railway station. Their response was as follows:
- “This site will impact adversely on the safe operation of the level crossing at Ash. Network Rail are working closely with Guildford Borough to investigate funding streams to facilitate the closure of the level crossing.
- CIL or Section 106 funding should be made available to help fund the closure of the level crossing as without its closure the level crossing will become prohibitively unsafe.”

- 11.20.10 The Strategic Highway Assessment Report: Guildford Borough Proposed Submission Local Plan “June 2016” (Surrey County Council, June 2016) (hereafter the SHAR 2016) identified in Figure 4.1 (page 27) that on an uncongested network in the morning peak period the preferred routes of travel from Local Plan growth could exacerbate existing conditions around Ash and Tongham.
- 11.20.11 Paragraph 4.1.2 (page 27) of the SHAR 2016 identified the following examples local to Policy A29:
- The junction of the A31 with the A331;
  - The network in the vicinity of Ash and Tongham
- 11.20.12 As a strategic tool, rather than a local detailed assessment model, the network assessed in the SHAR 2016 does not include all of the small lanes and streets around Ash and Tongham.
- 11.20.13 Scenario 2 of the SHAR 2016 is an assessment of the impact of the Local Plan growth without any highway mitigation. The junctions showing the largest increases in morning peak junction delay are set out in Table 4.8 (page 47). In particular the following junctions around Ash and Tongham are identified as suffering from large increases in delay:
- A323 Guildford Road with A324 Pirbright Road;
  - Oxenden Road with Manor Road;
  - A323/B3206/Manor Road, Ash;
  - Ash Level Crossing
- 11.20.14 The potential issues above further raised concerns about the potential impacts on lanes and streets as the Council was concerned that much of this increased delay would result in increased rat-running as described above.

#### *The Council’s Transport Strategy in Ash and Tongham*

- 11.20.15 The Council has taken the identified potential impacts on Ash and Tongham very seriously and has invested a significant amount of Council resources to develop a transport strategy for this part of Guildford borough. This is described further both in terms of what the Submission Local Plan policy requires for Site A29, but also what has actually been happening over the last few years as development has come forward in the absence of an up to date Local Plan.
- 11.20.16 The Council’s strategy has been to accommodate the Policy A29 traffic impacts through a number of significant infrastructure projects, which when implemented alongside coordinated layout planning of sites will limit the amount of development-related traffic that use the narrow lanes and streets described above. More importantly, the transport strategy has been developed to remove – as much as possible – the existing rat-running issues by bringing traffic back onto the principal A roads of the Local Road Network. The Council’s borough-wide transport strategy is set out in the Guildford Borough Transport Strategy 2017 (Guildford Borough Council, December 2017) (reference number GBC-LPSS-SD-038).

#### 11.20.17 Policy A29 Local Plan Requirements

Requirement (9) of Policy A29 is as follows:

"Land and provision of a new road bridge which will form part of the A323 Guildford Road, with an associated footbridge, to enable the closure of the level crossing on the A323 Guildford Road, adjacent to Ash railway station."

11.20.18 This requirement is considered necessary to overcome two potential severe issues:

- i) Network Rail's significant concerns about the impact of the additional traffic from this site allocation on the safe operation of the level crossing;
- ii) To ensure that the proposed site allocation traffic flows are directed to the A323 rather than using the narrow lanes and streets as identified above.

11.20.19 With regards to (i) above, the bypassing of the level crossing with a new A323 road and bridge will enable Network Rail to close the level crossing. In their latest risk assessment for the level crossing at Ash (November 2016), Network Rail identify the crossing as being within the top 20% of crossings in terms of risk, ranking it as 59th riskiest of the 320 level crossings on the Wessex route. The associated risk category identified by Network Rail is 'H4', 'high / medium' risk.

11.20.20 Network Rail expect risk at level crossings to increase in the future, as the number of crossing users increases (with population increases as well as the number of drivers, pedestrians and cyclists), increased pressure for new development and requirements to run additional train services as well as other factors. The most effective way of reducing level crossing risk according to Network Rail is to eliminate the crossing.

11.20.21 In respect of recent planning applications, Network Rail has stated that an alternative means of access over / under the railway for both vehicular and non-motorised users should be provided in order to facilitate the closure of Ash Level Crossing. Guildford Borough Council and Surrey County Council are both also of the view that mitigation of this nature is required to facilitate further development in this area.

11.20.22 Information provided by Network Rail identifies that there are 168 trains per day (over the 20 hour operational period) which pass through Ash station and therefore over the level crossing, requiring it to be closed to road users.

11.20.23 117 of the 168 trains are stopping services whereas 48 trains pass through the station without stopping. A further 3 freight trains pass through the station each day. Additionally, there may be a small number of other freight or maintenance trains which pass through the station.

11.20.24 Network Rail data for the level crossing identified that during November 2016, the average barrier time per closure was 3 minutes 15 seconds (based on data recorded between 6th and 13th November). The maximum period of any barrier closure was 12 minutes 32 seconds.

- 11.20.25 Overall, the barriers were closed for 6 hours 49 minutes 55 seconds, which is around one-third of the 20 hour operational rail period. On average, the barriers were closed 127 times per day and periods of closure can amount to up to 25 minutes per hour currently.
- 11.20.26 The bypassing of the level crossing mitigates against further impacts of proposed additional passenger train services on the line in future (from 2018 there will be an additional 3 trains per hour off-peak).
- 11.20.27 With regards to bullet point (ii) above, the new road bridge will enable Council to ensure during the development management process that developments that are proposed adjacent to Foreman Road, Ash Green Road and Harpers Lane can be masterplanned and joined together through internal access road connections so that traffic is directed towards the new road bridge and the A323 rather than having individual vehicular accesses onto the roads mentioned above. This will ensure that these developments will have minimal impact on the narrow lanes and streets.
- 11.20.28 The significant reduction in delay caused by the removal of the level crossing and the provision of a new A323 road and bridge south of the level crossing will significantly reduce the existing rat-running problem east of Ash eastbound on the A323 Guildford Road, as described earlier, by keeping traffic on the A323. This will also be the case for development traffic from sites in the wider Policy A29 allocation which will stay on the A323 rather than rat-running using narrow lanes and streets.
- 11.20.29 Requirement (10) of Policy A29 is as follows:
- “Proposed road layout or layouts to provide connections between both the individual development sites within this site allocation and between Ash Lodge Drive and Foreman Road, in order to maximise accessibility and to help alleviate congestion on the A323.”
- 11.20.30 The above requirement is proposed to ensure that local pedestrian, cyclist and limited vehicular traffic that is visiting local services such as Ash Manor School etc. have a continuous connection through the development sites. This will further limit traffic rat-running through alternative routes such as Ash Lodge Drive, Colne Way, Southlands Road, South Lane, Grange Road and Foreman Road.
- 11.20.31 It is not intended that this route will provide for significant through traffic and it will need to be designed in such a way that it does not provide an alternative route for longer distance traffic. This will be dealt with at the Development Management process and some of the route has already been secured through planning consent.
- 11.20.32 This route will also ensure that development related traffic will not use other sensitive routes as mentioned in paragraph 11.20.7 (iv) above.
- 11.20.33 The Infrastructure Schedule identifies a number of schemes that will assist in mitigating the impact of Local Plan growth alongside general growth and will assist in limiting the impact of traffic on the narrow lanes and streets.

- 11.20.34 The following schemes are identified in the Infrastructure Schedule and the intended benefits to the communities of Ash and Tongham are described:
- 11.20.35 Schemes LRN9, LRN10, LRN12 and LRN15 - these schemes are traffic management and environmental improvement schemes along A323 Ash Road and Guildford Road, B3411 Ash Hill Road, B3411 Ash Vale Road and The Street, Tongham. They are proposed to mitigate any negative impacts of traffic flow increases as a result of Local Plan growth and the strategy to reduce rat-running along narrow lanes and streets as discussed above. More information on the types of schemes that could be implemented are described in Appendix 5 of the Transport topic paper (Guildford Borough Council, December 2017).
- 11.20.36 Scheme LRN13 is described in the Infrastructure Schedule as "A323 Aldershot Road/A331 Blackwater Valley Road (Ash) junction improvement scheme". As discussed above, this junction suffers from peak period congestion and safety issues. An improvement to this junction which could include partial signalisation of the roundabout has been prepared and assessed by the Council and will assist in reducing rat-running through narrow lanes and streets in Tongham by keeping traffic on the A323 and would assist with the problems mentioned in paragraph 11.20.7(iii) above.
- 11.20.37 Scheme LRN14 is described in the Infrastructure Schedule as "A331 Blackwater Valley Route with A31 Hog's Back (Tongham) junction improvement scheme". This junction also suffers from peak period congestion and safety issues. An improvement to this junction has been prepared and assessed by the Council and would significantly reduce congestion and improve safety. This would also assist in reducing rat-running through Ash and Tongham by keeping traffic on the A31 and A331. This would assist with the problems mentioned in paragraph 11.20.7(i) above.
- 11.20.38 Scheme LRN24 is described in the Infrastructure Schedule as "A323 Guildford Road/A324 Pirbright Road junction improvement scheme". This junction also suffers from peak period congestion and contributes to rat-running through narrow lanes and streets in the Ash and Ash Green area. An improvement to this junction has been prepared and assessed by the Council. This improvement would assist with the problems mentioned in paragraph 11.20.7(iv) above.
- 11.20.39 It can be seen from the above explanations that the Council has developed a clear and comprehensive set of measures to ensure that the development proposals will not contribute towards existing safety issues relating to the level crossing at Ash or result in additional development vehicles using inappropriate narrow lanes and streets. Indeed, it is the view of the Council that the measures set out in Policy A29 and in the Infrastructure Schedule will significantly improve the transport situation in Ash and Tongham over the Plan period.

**11.21 *Are the site allocations too large or is there scope for a greater number of new homes in this location, being land beyond the Green Belt?***

- 11.21.1 The Council does not consider further development in this location would be sustainable. The justification for this is set out in more detail in the Council's response to Question 9.9 of the Inspector's Matters and Issues and forms part of the justification for new Green Belt being proposed around Ash and Tongham.
- 11.21.2 Regarding the extent of the proposed allocation, this accords with the recommended Potential Development Areas (PDAs) identified in Volume II of the Green Belt and Countryside Study. Whilst Volume II assessed the degree to which all land parcels scored against the Green Belt purposes, it applied a sieving approach in Green Belt areas which excluded identifying PDAs in land parcels which scored highly against Green Belt purposes. However given its non-Green Belt status, this sieving process was not applied around Ash and Tongham as it was considered appropriate that the assessment of whether the land could potentially accommodate development took priority over how well the land performed against Green Belt purposes. This is reflective of its status as a local designation with a lesser protection than Green Belt.
- 11.21.3 The Council therefore considers the approach taken to be robust in that CBGB land, which is higher in the spatial hierarchy, has been sustainably maximised prior to consideration of Green Belt land. The analysis in the GBCS (Volume II) which identifies PDAs on CBGB provides the evidence to justify the allocation at site A29.

**11.22 *Having regard to the different areas and land parcels involved in this allocation, should the plan say more about protecting and enhancing the character of the existing Ash and Tongham urban area and Ash Green villages and creating attractive and cohesive settlement(s)?***

- 11.22.1 This response should be read alongside the Council's response to *Question 9: Place making and design* of the Inspector's Initial Questions and *Question 10.1* of the Inspector's Matters and Issues. In response to these questions, the Council is proposing a draft modification that would merge Policy D1 and D4. The amended policy sets out the design principles and objectives that are applicable to all new development and goes on to identify those strategic sites where the Council will require masterplanning. These sites are within single ownership and can be designed and delivered in a comprehensive way.
- 11.22.2 The amended policy then goes on to identify specific design principles that are applicable to certain areas within the borough. These areas, which will be accommodating increased development as a result of the plan, are Guildford town centre, the villages (in particular those being inset from the Green Belt), and Ash and Tongham. By identifying what is unique to these areas and which specific considerations proposals should have regard to, these sites can be successfully integrated and delivered in a cohesive manner that responds to the local context. Specifically for Ash and Tongham, this policy ensures that the individual sites consider their relationship with each other and the current/future extent of the urban and rural areas. It also ensures that development proposals respect the existing

character of the urban area and Ash Green village, and that the edge of the urban area is designed to respond to the transition between it and the wider countryside and landscape.

#### A33, University of Law

##### **11.23 Should the plan be more ambitious regarding the number of students that could be accommodated on this site?**

- 11.23.1 This is a sensitive site given its location in the AONB and its close proximity to a listed building. It is an elevated site but very well screened by trees. It also has varying land levels with a significant drop to one side. These factors will all need to be considered carefully in the design of the site.
- 11.23.2 The Regulation 19 Local Plan (2016) included within the site policy requirements that buildings higher than two storeys were unlikely to be suitable. Representations were received from the site promotor that this was unreasonable given the early stages of the design process. This requirement was removed in the Regulation 19 Local Plan (2017).
- 11.23.3 The capacity of the site is approximate and is considered, without further evidence justifying a greater number, to be an appropriate estimate given the sensitivities of the site. It would not preclude a greater number of bedspaces coming forward through the planning application process should more detail be provided to demonstrate that the scale and distribution of the development proposed would not harm the surrounding landscape and heritage asset.

#### A35, Wisley Airfield

- 11.23.4 A planning application for a significant proportion of the site allocation was submitted in December 2014<sup>5</sup>. The application was refused by the Council in April 2016. The decision was appealed and a Public Inquiry was held in September 2017. The appeal has been called in by the Secretary of State and a decision is expected in the coming months. The response to this question should be read alongside the Statement of Common Ground between the Council and Wisley Property Investments Ltd in relation to this appeal site.

##### **11.24 Is the size of the allocation sufficient to create an adequately self-contained new village?**

- 11.24.1 The sustainability of a site is relative rather than absolute and within the plan-making process must be considered against considerations such as the scale of housing need and the availability of alternative sites. Whilst a new settlement is not at the top of the spatial hierarchy that has informed the spatial strategy and site selection process, this does not mean that properly planned this development option could not offer a sustainable location for growth.

---

<sup>5</sup> Planning application 15/P/00012.

- 11.24.2 The site is allocated for approximately 2,000 homes. Should the appeal site be allowed the capacity of the site might be greater to reflect the capacity of the additional land to the south which forms part of A35. However, the Council maintains its view that 2,000 homes in total is appropriate across the whole site allocation as this would allow for a better scheme design that responds more sympathetically to the surrounding character and landscape.
- 11.24.3 The Council considers that this quantum of development is sufficient to deliver a sustainable and mixed community with a range of on-site services and facilities that enables a degree of self-containment and negates the requirement for a proportion of outward-bound trips. This includes the local centre, primary school, secondary school and employment provision.
- 11.24.4 The Council expects Site A35 to be delivered in a comprehensive way in order to achieve a cohesive new community. The additional land to the south also enables a better relationship of parts of the development to the proposed local centre and the new services and facilities it will offer.
- 11.24.5 The NPPF states that planning should “*actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable*”<sup>6</sup>. The Council considers that A35 achieves this through the significant package of infrastructure that the plan requires and which has been secured as part of the S106 on the appeal site. This includes the proposed off-site cycle network, and the regular bus service to key destinations provided and secured in perpetuity.

**11.25 *What is the position regarding the substantial brownfield / hardstanding areas that are not included within the site boundary?***

- 11.25.1 Approximately 11.5 ha of previously developed land falls outside site A35 but within the appeal site. This land is within 400m of the SPA and is therefore inappropriate for residential development. This land is proposed to be remediated to become SANG.
- 11.26 *The site is on a rise, with extensive views. How would the visual impact of the scheme be handled?***
- 11.26.1 The part of the site that is on a rise forms part of the appeal site. The Surrey Hills AONB Planning Adviser was consulted as part of the application and advised that the development is a sufficient distance from the AONB for it not to give rise to any material impact on the nationally protected landscape.
- 11.26.2 The Officer's Report states that that the density of development proposed on the site would adversely impact on the rural character of the area immediately adjacent to the application site<sup>7</sup>. Additionally significant level changes on the site with sections of

---

<sup>6</sup> NPPF, paragraph 17.

<sup>7</sup> Paragraph 10.10.4.

land that are raised significantly above the adjoining land would add to the visual sensitivity of the site in longer-range views<sup>8</sup>.

- 11.26.3 The report goes on to state that a detailed Landscape and Visual Impact Assessment (LVIA) submitted as part of the application included an assessment of the impact of development on longer-range views. This includes a refined Zone of Visibility that identifies areas in which the development is likely to be visible accounting for intervening factors such as landscape contours, woodlands and existing development. This concludes that the site is well screened in long-range views from the west, north, east and south-east and would not be visible as it is largely screened by existing urban areas<sup>9</sup>.
- 11.26.4 The report states that the LVIA does identify that the site would be visible from the higher land to the south including from with the Surrey Hills. The intervening distances are, however, so significant (approximately 6km) that, while the development would be visible, the development would appear as one of a number of areas of development within a panoramic view. While the view would undoubtedly change, it could not be said to be materially harmful to these long-range landscape views<sup>10</sup>.
- 11.26.5 The visual impact of the proposal was therefore not a reason for refusal. However as set out above, the larger site area of A35 with a similar quantum of homes would enable a more sympathetic design that respects the surrounding character and landscape.

### **11.27 How would the site access be handled?**

- 11.27.1 Please refer to paragraphs 8-9 of the Statement of Common Ground between the Council and Wisley Property Investments Ltd for the agreed position on how access to their land ownership element of the site allocation would be achieved. In summary, access for all modes will be from the Ockham Interchange and Old Lane with pedestrian and cycle access also from Elm Lane and Ockham Lane.
- 11.27.2 Recognising that the southern area of the Policy site A35 is not controlled by Wisley Property Investments Ltd, there is also opportunity to provide access to support a limited quantum of development via the existing Hatch Lane access. However, although in isolation the consortium of landowners which control this area suggest that they can deliver a smaller amount of development without major highway works being required, there is the issue of cumulative impact and this would need to be assessed and any infrastructure requirements apportioned appropriately between the various land ownerships. This should be taken into account when reading the answers to Questions 11.28, 11.29 and 11.30 below.

---

<sup>8</sup> Paragraph 10.10.5.

<sup>9</sup> Paragraph 10.10.6.

<sup>10</sup> Paragraph 10.10.7.

**11.28 *What is the relationship of this site to the A3 infrastructure improvement works?***

11.28.1 Please refer to paragraphs 10-14 of the Statement of Common Ground between the Council and Wisley Property Investments Ltd for the agreed position on the relationship of this site to the A3 infrastructure improvement works. The Statement of Common Ground also identifies that Highways England are yet to agree this package of measures.

**11.29 *What would be the pattern of movement from the site? How could the plan effectively promote more sustainable transport modes?***

11.29.1 Please refer to paragraphs 15-16 of the Statement of Common Ground between the Council and Wisley Property Investments Ltd for the agreed position on the pattern of movement from the site, which was agreed by Surrey County Council and Guildford Borough Council for the appeal. In addition, the Statement of Common Ground refers the Inspector to the Community Trust proposals and the measures agreed in the draft conditions and Section 106 Agreement (see enclosures to the Statement of Common Ground) to promote as much as possible sustainable transport modes. These measures closely reflect the Requirements set out in Policy A35 to maximise the use of sustainable transport modes in so far as the site's size, characteristics and location allow.

**11.30 *What is the timing of the key infrastructure works for this allocation and their relationship to the delivery trajectory for the site?***

11.30.1 Please refer to paragraphs 17-19 and Table 1 of the Statement of Common Ground between the Council and Wisley Property Investments Ltd for the agreed position on the potential timing of the delivery of key infrastructure works and their relationship to the delivery trajectory for the site.

**11.31 *Can the plan's provisions effectively prevent an adverse impact on the SPA?***

11.31.1 Natural England is satisfied that the appeal proposal is unlikely to lead to a significant effect on the Thames Basin Heaths SPA. Whilst the outcome of the appeal is currently unknown, this provides sufficient evidence to demonstrate that the bespoke SANG being proposed is appropriate. Whilst Site A35 is larger than the appeal scheme and extends out to the south, the site promoters of the additional land have also consulted with Natural England. Natural England has confirmed that it would have no in-principle objection to the expanded site as there is sufficient land available to create a bolt-on SANG that could link with the SANG proposed as part of the appeal scheme. Policy P5 and site allocation policy A35 ensures that adequate and appropriate mitigation and avoidance measures will be required.

**11.32 How much of the site is considered to be brownfield land?**

11.32.1 Approximately 19ha of site A35 constitutes previously developed land.

**11.33 Are there local level exceptional circumstances that justify the release of the site from the Green Belt?**

11.33.1 This response should be read alongside the Council's response to *Question 8: Green Belt (appendix 5)* of the Inspector's Initial Questions which provides more detail of the exceptional circumstances. The local level exceptional circumstances that justify this site include the limited harm that this new settlement would have on the wider Green Belt given its location on a medium sensitivity land parcel. It is also a strategic site allocation that is able to accommodate a mix of uses including C2 and traveller accommodation, and makes a significant contribution towards meeting identified needs for housing. Its scale also enables the delivery of a significant package of supporting infrastructure which are necessary to make the development acceptable, but which will also have wider benefits. This includes a significant bus network, provided in perpetuity, to a range of nearby rail stations and service centres, a secondary school and two new slips on the A3 at Burnt Common. The site is also partly brownfield and the development of the site would enable the reuse and remediation of this land.

A43, Land at Garlick's Arch, Send; A43a, New North-facing Slip Roads on the A3;  
A58, Land adjacent to Burnt Common Warehouse, Send

**11.34 Are there local exceptional circumstances that justify the release of this land from the Green Belt? In combination with the allocation at A25, Gosden Hill Farm, (see 11.14 above), is there a risk of a significant diminution of the Green Belt in this locality? Can the perception of the eastward sprawl of the wider Guildford urban area along the A3, and the encroachment into the undeveloped gaps, be avoided?**

11.34.1 This response should be read alongside the Council's response to *Question 8: Green Belt (appendix 5)* of the Inspector's Initial Questions which provides more detail of the exceptional circumstances. The local level exceptional circumstances that justify A43 and A58 include the limited harm that these village extensions would have on the wider Green Belt given their location on medium sensitivity land parcels. Site A43 facilitates delivery of the two new slips at Site A43a. It is also able to contribute towards meeting housing and Travelling Showpeople need early in the plan period. Site A58 is partly previously developed land and is able to meet currently identified industrial needs with the potential for further industrial land to meet future borough needs. Suitable and available alternative industrial sites are rare so this provides an opportunity to provide greater flexibility during or post the plan period.

11.34.2 Site A43a is necessary primarily to mitigate the impact of A35 former Wisley airfield, but also other development, which would otherwise contribute towards an unacceptable impact in Ripley. The land required to deliver the northern slip would in any case have had to be removed from the Green Belt as part of removing land to

deliver A43. The land proposed to be removed to deliver the southern slip is not considered to significantly harm the openness of the wider Green Belt given its relationship with the A3. Whilst directly mitigating the impact of A35, the new slips will benefit the existing residents of Ripley by removing significant levels of traffic that would otherwise pass through the village by enabling vehicles to get onto the strategic road network earlier. The benefits of these slips and limited impact they would have on the wider Green Belt constitute the local level exceptional circumstances to justify Site A43a.

- 11.34.3 The second part of this issue related to the in combination impact of A25 Gosden Hill and these allocations in Send Marsh on the Green Belt is answered in the Council's response to Question 11.14.

**11.35 *Would the developments proposed in these allocations integrate with the village or would they be separate entities?***

- 11.35.1 Site A43 would be integrated into, and form part of, the village of Send Marsh / Burnt Common. The site policy includes the following opportunity which the Council would expect to be developed as part of the masterplanning of the site. This would include walking and cycling connections.
- A43(2) - Encourage connections with services and facilities in the village
- 11.35.2 A further opportunity which is being explored is to reroute the Portsmouth Road through the site thereby relieving some of the traffic on the existing road and junction. This would also help integrate the development with the existing village along Burnt Common Lane and beyond. This is considered to be the most important linkage between the village and the development as the majority of the services and facilities are along Send Barnes Lane going north. Opportunities for physical integration along the eastern part of Portsmouth Road is more limited as the existing housing backs onto this road and the site itself is bounded by ancient woodland here. Given where the services and facilities are located, the Council considers that this part of the development would more importantly relate better to the western part of the site and the village beyond.
- 11.35.3 Site A58 is allocated for industrial uses. The policy requires that careful consideration is given to the distribution of industrial uses within the site, given the existing housing along its eastern edge. The Council would expect light industrial uses along this edge with general industrial and storage & distribution towards the west, given this use is less compatible with residential development. Furthermore the policy requires:
- A58(1) - An appropriate green buffer on the eastern part of the site between the existing residential use and proposed employment uses
- 11.35.4 Whilst pedestrian and cycle linkages into the village would be expected, so workers could benefit from the services and facilities nearby, the Council expects that this site would in other regards form a relatively distinct entity given its use and the need to maintain some separation for amenity purposes.

**11.36 What steps would be taken to ensure that they promoted sustainable development and sustainable movement patterns?**

Summary

- 11.36.1 The site A43 Land at Garlick's Arch is located close to the communities of Send Marsh and Send. The employment site proposed at A58 Land adjacent to Burnt Common Warehouse is west of the Garlick's Arch site. The two sites are separated by the A247. A43a Land for new north facing slips roads is located south of the Garlick's Arch site.
- 11.36.2 Technical assessments scoping the transport impacts of A43 and A58 have been submitted to the Council as part of the Regulation 19 Public Consultation on the Submission Local Plan: Strategy and Sites (December 2017).
- 11.36.3 There is an existing network of pedestrian and cycle routes from the Garlick's Arch site to educational facilities, local shopping facilities and community facilities within a short distance of the proposed site.
- 11.36.4 There are opportunities to improve this network in order to encourage a greater number of trips by sustainable modes.
- 11.36.5 There are existing bus services and bus stops in the vicinity of the sites which provide links to Cobham, Esher, Guildford, Kingston, Surbiton and Woking. There is an opportunity to link the development to a half hourly new bus service provided by the Wisley Airfield development when this obligation is triggered. There is an opportunity for a bus service to be provided or enhanced by the developer of the Garlick's Arch site in advance of this.
- 11.36.6 There are also opportunities to improve pedestrian and cycle routes between the housing allocation at Garlick's Arch and the employment proposed at Burnt Common to encourage sustainable patterns of movement between the sites.

Introduction

- 11.36.7 This response explains the opportunities to promote sustainable development and sustainable movement patterns at sites A43 and A58. Site A43a is for land to develop new slip roads on the A3 trunk road.
- 11.36.8 The site promoter in relation to A43 Land at Garlick's Arch has undertaken technical assessments on the site including a Transport Feasibility Appraisal prepared in July 2017. This was submitted as part of the site promoter's representation to the Regulation 19 public consultation and is available at this link:  
[https://getinvolved.guildford.gov.uk/gf2.ti/af/818146/131064/PDF//Technical\\_Appendix.pdf](https://getinvolved.guildford.gov.uk/gf2.ti/af/818146/131064/PDF//Technical_Appendix.pdf)
- 11.36.9 The site promoter in relation to A58 Land around Burnt Common Warehouse has also undertaken a Transport Impact Assessment prepared in July 2017, which was

submitted as part of the site promoter's representation to the Regulation 19 public consultation and is available at this link:

[https://getinvolved.guildford.gov.uk/gf2.ti/af/818146/129732/PDF/-/20170721\\_Transport\\_Impact\\_Assessment\\_TN02.pdf](https://getinvolved.guildford.gov.uk/gf2.ti/af/818146/129732/PDF/-/20170721_Transport_Impact_Assessment_TN02.pdf)

- 11.36.10 This note draws from the material in the both documents submitted to the Regulation 19 public consultation.

#### Existing situation

- 11.36.11 Garlick's Arch is considered as contiguous with the community of Send Marsh and close to Send Village. There are a range of facilities including schools, local shopping facilities and community facilities within a short distance of the proposed site.

#### Local Amenities

- 11.36.12 The application site at Garlick's Arch is well located with respect to a range of facilities and services that can be accessed by walking, cycling and public transport in accordance with the guiding principles of the NPPF.
- 11.36.13 There are two main employment sites within 800 metres of the site - a small business park on Portsmouth Road near Burntcommon crossroads and a group of industrial units to the west of the Burntcommon crossroads.
- 11.36.14 There is BP garage with a Little Waitrose located at Burntcommon crossroads within 800 metres of the site. The villages of West Clandon, Ripley and Send and Send Marsh contain more extensive retail facilities.
- 11.36.15 There is a medical practice located on Send Barns Lane within 1200 metres of the site.
- 11.36.16 Send Primary School is within 1200 metres of the site. There are also primary schools in Ripley and Burpham.

#### Connectivity

- 11.36.17 The local highway network is focused around the B2215 (Portsmouth Road) and A247 (Clandon Road/Send Barnes Lane), which together provide the key route from the site to the village centre and the A3 trunk road via a new site access junction that links to the new Burntcommon slip roads (A43a).
- 11.36.18 The Garlick's Arch site is connected to an extensive network of pedestrian and cycle routes. The footways incorporate crossing facilities (i.e. dropped kerbs with tactile paving) along key desire lines. In this regard, the site is well placed to encourage future residents to make use of these sustainable modes of transport when travelling to and from the site.
- 11.36.19 Footways provide connectivity to the local bus network with the closest bus stops to the Garlick's Arch site located adjacent to the Portsmouth Road/Burnt Common Lane

junction. Bus services that operate from this stop (Routes 462/463 and 515) follow routes that incorporate Cobham, Esher, Guildford, Kingston, Surbiton and Woking.

- 11.36.20 Bus route 462/463 also stops at Clandon railway station, which is served by eight trains per hour (four to London Waterloo and four to Guildford).

#### Proposed Public Transport Access

- 11.36.21 To ensure good access to public transport to and from the Garlick's Arch site, the promoter proposes to upgrade the pedestrian links to the existing bus stops on Portsmouth Road and upgrade the bus stops to include shelters.
- 11.36.22 There is also the potential for existing bus stops to be supplemented by the creation of new bus stops within the Garlick's Arch site. The delivery of these will be dependent upon the outcome of discussions with local bus operators to explore the potential for diverting existing services through the site. In the Transport Feasibility Appraisal the site promoter considers that it would be viable to divert either of the existing routes that serve the site (i.e. 462/463 and 515) without having a significant impact upon their current timetables or routes.

#### Opportunity for bus services from Wisley Airfield (Policy A35)

- 11.36.23 There is also an opportunity to provide a stop serving the Garlick's Arch site and the employment site at Burnt Common from the new bus service to Guildford from the new settlement at the former Wisley Airfield required as part of Policy A35. Currently services 462/463 connect the sites from stops at xxx to Guildford and run on hourly basis after 10am Monday to Friday. A new service operating from the former Wisley Airfield site to Guildford twice per hour could stop at the site subject to discussions between parties and Surrey County Council.
- 11.36.24 The bus service from the former Wisley Airfield site has been agreed in the Section 106 agreement signed between Wisley Property Developments Limited, the Council and Surrey County Council. The Section 106 agreement includes a planning obligation requiring that the service is be provided in perpetuity to guarantee continued operation. The phasing of development of sites A35 Former Wisley Airfield ,A43 Land at Garlick's Arch and A58, Land adjacent to Burnt Common Warehouse, Send are different and the trigger point for provision of the bus service in perpetuity is likely to be at the latter point of the development at A43 Land at Garlick's Arch.
- 11.36.25 There would therefore be an opportunity for a bus service to be provided or enhanced by the developers at Garlick's Arch and/or Burnt Common Warehouse, Send until the point at which the service is provided by the developer of the former Wisley Airfield.

#### Proposed Pedestrian and Cycle improvements

- 11.36.26 Whilst it is considered that the Garlick's Arch site benefits from reasonable pedestrian access to various local services and facilities, there are opportunities for improvements to existing pedestrian facilities to link the site to these amenities.

- 11.36.27 Opportunities exist to undertake widening of footways, enhancement of street lighting in order to create a more attractive route for pedestrians to and from the Garlick's Arch site. There are currently no pedestrian crossings provided between the site and the existing residential areas accessed off Send March Road to the east. There is an opportunity therefore to construct a new section of footway on the southern side of Portsmouth Road and create a new uncontrolled pedestrian crossing, similar to that already provided to the west of the Portsmouth Road/Burnt Common Lane junction. This would cater for trips to and from a local centre on the site as proposed by the site promoter.
- 11.36.28 The Transport Feasibility Appraisal for the Garlick's Arch site also sets out that the internal layout of potential development will seek to encourage low vehicle speeds and provide convenient pedestrian links to existing and enhanced networks identified. The future development will also include appropriate links to the existing cycle routes such as a connection between the site and existing cycle routes along Portsmouth Road.
- 11.36.29 Turning to the employment site proposed for the Land adjacent to Burnt Common Warehouse, Send, the site promoter proposes to provide the following pedestrian and cycling improvements:
- a new 3-metre wide shared cycleway / footway adjacent to the site on the southern side of London Road
  - widening of existing sections of cycleway / footway at the Burnt Common roundabout
  - refreshing of / provision of new give-way markings and signage along London Road
- 11.36.30 Appendix C: Infrastructure Schedule in the Submission Local Plan includes scheme LRN20 – A traffic management and environmental improvement scheme within Send. Detail on this scheme is available in the Transport topic paper (December 2017) (Section / Page A5-14).

#### Benefit of additional housing in terms of sustainable links to employment

- 11.36.31 The allocation of 400 dwellings at A43 Land at Garlick's Arch creates opportunities for sustainable movement patterns to and from the new employment site at A58 Land at Burnt Common Warehouse. This would be enabled through a number of improvement works to the eastern side of London Road such as the provision of a new 3-metre wide shared cycleway / footway adjacent to the Burnt Common site on the southern side of London Road, as identified in the Transport Impact Assessment (July 2017) produced by the site promoter for the Land at Burnt Common Warehouse, Send.

**11.37 What are the anticipated movement patterns arising from the new slip roads in combination with the housing and employment allocation, taking into account the potential for a redistribution of traffic from the strategic road network (notably from the east towards Woking), and what would their effects be on the roads through Send, including traffic flow, noise and air quality?**

**Summary**

- 11.37.1 New north facing junctions to the A3 at the A247 Burnt Common interchange are included in the Infrastructure Schedule and referenced as SRN9 'A3 northbound on-slip at A247 Clandon Road' and SRN10 'A3 southbound off-slip at A247 Clandon Road'. These junctions are being promoted to mitigate the impact of the level of strategic planned growth and in particular the development traffic flows resulting from the development of a new settlement at the former Wisley airfield (site Policy A35), as well as limiting any increase in traffic joining and leaving the A3 at the Ockham interchange.
- 11.37.2 This response includes evidence of the anticipated movement patterns arising from the new slip roads and proposed developments, taking into account the potential redistribution of traffic from the Strategic Road Network, particularly from the east towards Woking.
- 11.37.3 Evidence to demonstrate the impact on the A247 through Send has been extracted from Surrey County Council's SINTRAM model as prepared for the Guildford Borough Proposed Submission Local Plan "June 2016": Strategic Highway Assessment Report (Surrey County Council, June 2016) (hereafter the SHAR 2016)<sup>11</sup>. This forecasts a modest (10%) increase in vehicles movements travelling northbound on the A247 Send Road in the average AM peak hour. The increase is only 2% in average PM peak hour. In the southbound direction, there are decreases of 7% in the average AM peak hour and 19% in the average PM peak hour in vehicles using the A247 Send Road.
- 11.37.4 Overall, there is an increase of 3% in vehicular movements in the average AM peak hour (northbound and southbound direction) forecast on the A247 through Send and a decrease of 8% in vehicular movements in the PM peak hour (northbound and southbound).
- 11.37.5 The Council commissioned consultant AECOM to undertake a noise and air quality review of the potential changes in traffic flow in Send, with the forecast traffic flows from the SHAR 2016 as an input. As a result of limited changes in traffic flows, AECOM anticipates negligible noise impacts and no significant effects on air quality in Send.
- 11.37.6 Highways England has also provided information on the impact of the Burnt Common slip roads in their assessment of the impact of the M25 Junction 10 / A3 Wisley Interchange Improvement scheme which is scheme SRN3 in the Appendix C

---

<sup>11</sup> Submission document reference GBC-LPSS-SD-039a.

Infrastructure Schedule of the Plan. This forecasts that ‘the addition of north facing slips at Burnt Common as proposed in Guildford Borough Council’s Draft Local Plan would reduce traffic through the Newark Lane junction by 11% in the AM peak in 2037.’<sup>12</sup>

- 11.37.7 Finally, the site promoter for site A43 Land at Garlick’s Arch has submitted to the Guildford Borough Council a Transport Feasibility Assessment as part of their representation to the consultation on the Regulation 19 Local Plan (2017). This assessment includes anticipated trip distribution and modal split based on 2011 Census data. This shows the largest percentage of work trips are east towards the Ockham Interchange to destinations in and around Greater London. With the Burnt Common slips in place, it is expected that trips to and from the London direction will reassign to access / egress the A3 from Burnt Common rather than use B2215 Portsmouth Road through Ripley.

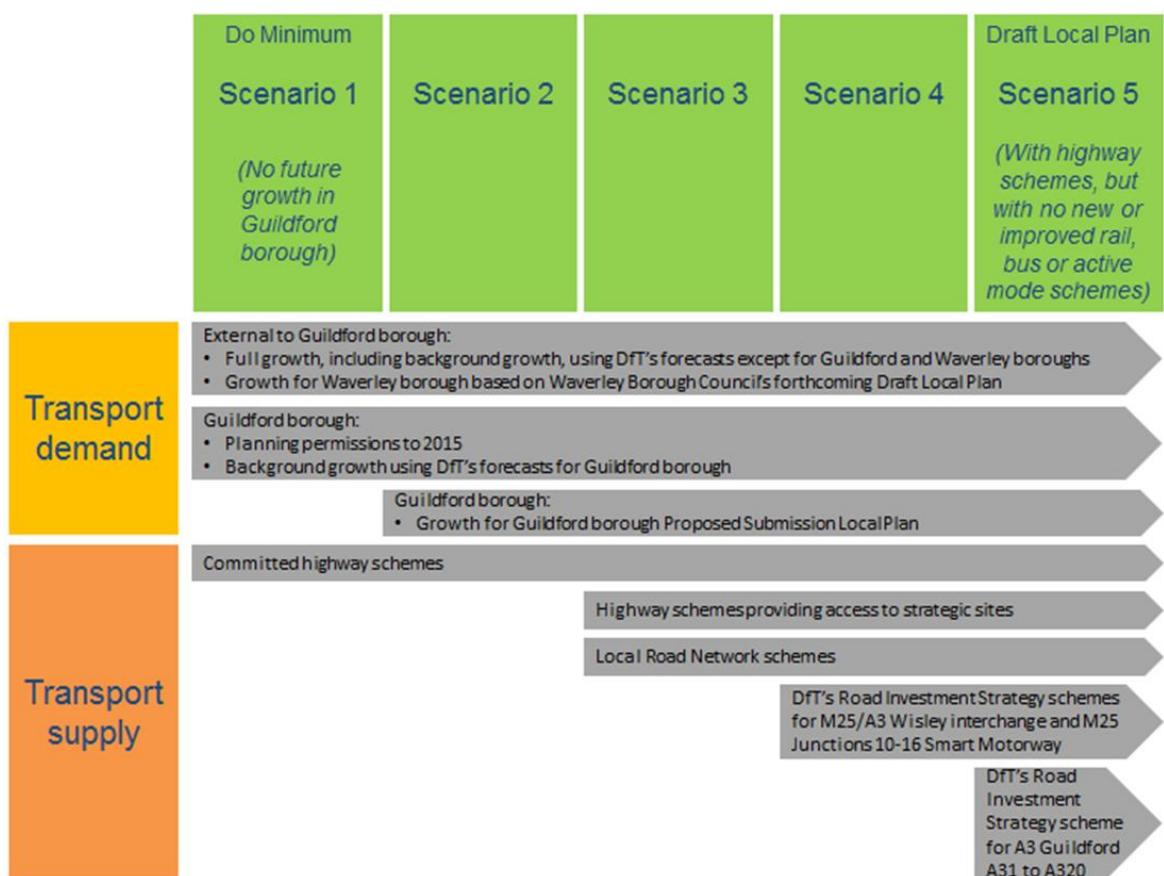
#### **Evidence from SINTRAM model on impacts on A247 Send Road**

- 11.37.8 The SHAR 2016 is a technical report on the strategic highway assessment of the spatial strategy in the Regulation 19 Local Plan (2016). It represents a robust “worst case” in terms of transport demand and supply assumptions, as it does not assess and therefore does not account for the mitigation; including the potential for modal shift, and the new and improved sustainable transport choices provided by the rail, bus and active modes schemes included in the Regulation 19 Local Plan (2016) and makes no allowance for any internalisation of trips within the larger sites. Figure 11.7 shows the scenarios tested in the SHAR 2016.

---

<sup>12</sup> M25 junction 10/A3 Wisley interchange improvement scheme Statutory consultation brochure 12 February to 26 March 2018 Revised 12.02.2018

Figure 11.7: Outline of scenarios in SHAR 2016



Source: Figure 3.1b in SHAR 2016

- 11.37.9 With respect to this matter, forecast traffic flows were extracted from all scenarios for the A247 Send Road through Send, just north of signalled junction with B368 Send Marsh and Send Hill. Table 11.3 sets out the forecast traffic flows for all scenarios and also present a direct comparison of Scenarios 1 and 3, which relate most directly to the Inspector's question.
- 11.37.10 With respect to this matter, scenarios 1 and 3 involve:
- 2031 Do-Minimum scenario 1 – which does not include Local Plan growth or the new Burnt Common slip roads
  - 2031 Do-Something scenario 3 – which includes Local Plan growth and the new Burnt Common slip roads

**Table 11.3 – Forecast traffic flows for the A247 Send Road for all scenarios in SHAR 2016**

Direction	Scenario					Difference Sc3 vs Sc1
	Sc1	Sc2	Sc3	Sc4	Sc5	
Average AM peak hour						
Northbound	789	870	870	880	863	
Southbound	546	535	510	541	524	
Average PM peak hour						
Northbound	729	755	742	746	728	
Southbound	687	609	556	567	584	
					Average AM peak hour	
	81					45
	-36					
					Average PM peak hour	
	13					-118
	-131					

- 11.37.11 The forecasts show a modest increase (10%) in vehicles movements travelling northbound on the A247 Send Road in the average AM peak hour. There is an increase of only 13 vehicles (2%) in the average PM peak hour in the northbound direction. In the southbound direction, there are reductions in vehicles using the A247 Send Road in the AM (-7%) and PM (-19%) average peak hours.
- 11.37.12 Overall, there is an increase of 3% in vehicular movements in the average AM peak hour (northbound and southbound direction) forecast on the A247 through Send and a decrease of 8% in vehicular movements in the average PM peak hour (northbound and southbound).

#### **Evidence on noise and air quality impacts on A247 Send Road**

- 11.37.13 On behalf of the Council, AECOM has undertaken a noise and air quality review of the potential changes in traffic flow in Send. This is reproduced in Appendix 11.4. This used the forecast traffic flows for the A247 Send Road for all scenarios in the SHAR 2016 (as presented in Table 11.3). AECOM used this information along with an Automatic Traffic Count (ATC) for the A247 to calculate 24 hour Annual Average Daily Traffic (AADT) flows and 18 hour Annual Average Weekday Traffic (AAWT) flows for consideration in terms of air quality and noise respectively. Heavy Goods Vehicle (HGV) data was also derived from the ATC data. No site specific speed information was available, however this road is has a speed limit of 30 mph (48 kph).

- 11.37.14 AECOM's conclude:
- The maximum difference in 18hr AAWT traffic flows between the 5 scenarios is 3%, which is anticipated to result in very small differences in traffic noise levels between each scenario which would be classed as negligible in Send.
  - All changes in traffic flow are below the Design Manual for Roads and Bridges air quality screening criteria for potentially significant adverse effects on air quality, therefore no significant effects are anticipated from these aspects of the Local Plan in Send.

## **Evidence from Highways England M25 Junction 10 / A3 Wisley Interchange Improvement Scheme Public consultation**

11.37.15 Highways England's public consultation brochure for the M25 Junction 10 A3 Wisley Interchange Improvement scheme (Appendix 11.5) includes reference to the impact of the scheme through Ripley and the benefit to the local road network of the Burnt Common slips.

11.37.16 According to the public consultation brochure with the scheme as proposed (not including the slip roads):

'Traffic through Ripley is forecast to increase as a result of background growth and this scheme adds a further 4% more traffic through the Newark Lane junction in the AM peak in 2037.' (p.6) M25 junction 10/A3 Wisley interchange Improvement Scheme Statutory consultation brochure Revised 12.02.2018)

11.37.17 Regarding the impact of the Burnt Common slip roads, the brochure states that:

'The addition of north facing slips at Burnt Common as proposed in Guildford Borough Council's Draft Local Plan would reduce traffic through the Newark Lane junction by 11% the AM peak in 2037.'(p.6) M25 junction 10/A3 Wisley interchange Improvement Scheme Statutory consultation brochure Revised 12.02.2018)

## **Evidence from Motion Transport Feasibility Assessment July 2017 regarding A43 Land at Garlick's Arch, Send**

11.37.18 The site promoter for the site at A58 Land at Garlick's Arch – the site with the higher transport impact – provided a Transport Feasibility Assessment as part of representations made to the public consultation on the Regulation 19 Local Plan (2017). This assessment included a high-level traffic impact assessment to forecast the origin and destination of the development related trips. This Transport Feasibility Assessment has not been formally reviewed by Surrey County Council, the Local Highway Authority.

11.37.19 The following table and figure are taken from the Motion Transport Feasibility Assessment (July 2017). Table 11.4 shows the place of work for residents living within the Guildford 001 MSOA and the routes forecast to use to get to work. This shows existing trip patterns based on Census data from 2011 on where people work who live in Ward area Guildford 001 (which covers an area including Burnt Common, Garlick's Arch, Send, West Clandon, Ockham and Wisley). This shows the largest percentage of work trips are east towards the Ockham Interchange to destinations in and around Greater London. The second highest percentage of trips is west towards Guildford. The third largest percentage of trips is north towards Woking. With the Burnt Common Slips in place it is expected that trips to and from the London direction will reassigned to access / egress the A3 from Burnt Common rather than use Portsmouth Road through Ripley. Figure 11.8 shows the modal split of trips to work from wards within the vicinity of the Garlick's Arch site. The data is drawn from the Census 2011 journey to work dataset.

Table 11.4 – Extract from Motion -Transport Feasibility Assessment (July 2017) produced for Land at Garlick's Arch Site

*This table shows the place of work for residents living within the Guildford 001 MSOA and the routes forecast to use to get to work.*

#### **Land at Garlick's Arch - Residential Impact**

Traffic Distribution (Based on 2011 Census Data)

Place of work	Place of Residence Guildford 001	Route
The North	10	0.5%
Hertfordshire	13	0.6%
Norwich	2	0.1%
Greater London	329	15.5%
Berkshire	51	2.4%
Buckinghamshire	9	0.4%
Brighton and Hove	4	0.2%
Hampshire	98	4.6%
Kent	8	0.4%
Oxfordshire	7	0.3%
Elmbridge	190	8.9%
Epsom and Ewell	19	0.9%
Guildford 001	175	8.2%
Guildford 002	14	0.7%
Guildford 003	46	2.2%
Guildford 005	26	1.2%
Guildford 006	7	0.3%
Guildford 007	33	1.6%
Guildford 008	39	1.8%
Guildford 009	4	0.2%
Guildford 010	1	0.0%
Guildford 011	31	1.5%
Guildford 012	40	1.9%
Guildford 013	126	5.9%
Guildford 014	4	0.2%
Guildford 015	59	2.8%
Guildford 016	21	1.0%
Guildford 017	25	1.2%
Guildford 018	24	1.1%
Mole Valley	76	3.6%
Reigate and Banstead	24	1.1%
Runnymede	83	3.9%
Spelthorne	38	1.8%
Surrey Heath	46	2.2%
Tandridge	1	0.0%
Waverley	96	4.5%
Woking	308	14.5%
West Sussex	36	1.7%
West Country & Wales	5	0.2%
<b>Total</b>	<b>2,128</b>	<b>100.0%</b>

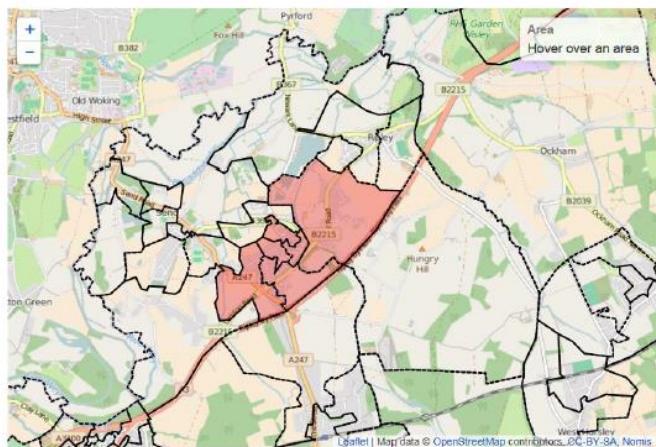
#### **Summary**

Route	%
Portsmouth Road East, Ockham Interchange	37.3%
Portsmouth Road West, A3 West	32.1%
Portsmouth Road West, A247 South	9.8%
Portsmouth Road West, A247 North	20.7%
<b>Total</b>	<b>100%</b>

Figure 11.8: Modal Split of trips from wards within the vicinity of the Garlick's Arch Site

**2011 Census - Journey to Work Data**

*Study Area*



*Census Data*

<b>Method of Travel to Work</b>	<b>E00155366</b>	<b>E00155443</b>	<b>E00155444</b>	<b>E00155445</b>	<b>E00155447</b>	<b>E00155449</b>	<b>TOTAL</b>
Underground, metro, light rail, tram	4	0	0	0	0	0	4 0.5%
Train	16	13	8	18	22	20	97 11.2%
Bus, minibus or coach	2	1	3	2	2	1	11 1.3%
Taxi	0	0	0	0	0	0	0 0.0%
Motorcycle, scooter or moped	3	1	0	1	0	1	6 0.7%
Driving a car or van	112	118	116	110	137	87	680 78.7%
Passenger in a car or van	5	5	5	7	6	2	30 3.5%
Bicycle	5	0	0	0	1	0	6 0.7%
On foot	3	1	1	3	10	5	23 2.7%
Other method of travel to work	0	1	1	3	0	2	7 0.8%
<b>TOTAL</b>	<b>150</b>	<b>140</b>	<b>134</b>	<b>144</b>	<b>178</b>	<b>118</b>	<b>864 100.0%</b>

<b>Method of Travel to Work</b>	<b>GBC</b>
Underground, metro, light rail, tram	227 0.4%
Train	7,934 12.3%
Bus, minibus or coach	2,392 3.7%
Taxi	152 0.2%
Motorcycle, scooter or moped	539 0.8%
Driving a car or van	40,157 62.2%
Passenger in a car or van	2,566 4.0%
Bicycle	1,802 2.8%
On foot	8,396 13.0%
Other method of travel to work	426 0.7%
<b>TOTAL</b>	<b>64,591 100.0%</b>

A44: Land west of Winds Ridge and Send Hill

**11.38 What would be the traffic impact of this development on the road serving the site?**

Summary

11.38.1 This site is allocated for 40 dwellings and two traveller pitches. Send Hill is a rural road which is in shared use by low numbers of both vehicles and pedestrians. The road serves an established residential area of Send. The estimated traffic flows from the allocation for the morning peak hour period when added to the existing traffic flow would be below 100 vehicles an hour ensuring that the road would continue to work well in a shared surface arrangement. Even in the event that traffic flows were to significantly exceed 100 vehicles per hour, it is unlikely to have an impact on road safety. The traveller pitches are able to be accommodated in terms of access and it is likely that the movement of large vehicles associated with this use will be minimal.

Existing situation - What are the traffic conditions currently?

- 11.38.2 The site is located on Send Hill in an established residential area. Send Hill is single carriageway rural road. From the junction with Potters Lane, the road is marked with a centre line for approximately 60 metres. The road then narrows for approximately 600m and is therefore unsuitable for large vehicles except for access. The northern section of Send Hill, past its junction with Orchard Way is wider. To the north of the site along Send Hill there is also a short footway on the northern side of Send Hill for approximately 60 metres.
- 11.38.3 Send Hill is used in a shared manner by low numbers of both vehicles and pedestrians. The speed limit on Send Hill on the stretch from just south of the cemetery, past the site and along the northern section of Send Hill is 30mph. Vehicle speeds are generally kept low due to the nature of the road. When passing vehicles meet, they are generally required to slow, which helps reinforce the low speeds on the road.
- 11.38.4 The Council carried out a traffic survey on Send Hill on the morning of Thursday 3 May 2018 at the current site access. The following movements were recorded in the morning peak 0800–0900 hours:

**Table 11.5: Traffic survey on Send Hill at current site access –  
Thursday 3 May 2018: 0800-0900**

<b>Mode/Vehicle</b>	<b>South to north</b>	<b>North to south</b>
Pedestrians – adults	2	3
Pedestrian – children	0	0
Of which, walking dog/s	2	2
Bicycles	0	0
Cars and LGVs	17	11
HGVs	0	1
Mopeds/Motorcycles	0	0

- 11.38.5 In the morning peak hour (0800-0900), 17 vehicles were recorded travelling past the current site access on Send Hill from the south (from the Potters Lane direction) and 12 vehicles were recorded travelling past the site from the north (from the direction of the centre of Send village), of which one was an HGV. This gives a total of 30 two-way vehicular movements (in terms of passenger car units (PCUs)).
- 11.38.6 Two pedestrians were recorded passing the site access from south to north and three pedestrians from north to south.
- 11.38.7 These figures demonstrate that Send Hill is being used by a mix of pedestrians and vehicles.

- 11.38.8 This is consistent with the Department for Transport's Manual for Streets (2007) which indicates that shared surfaces are likely to work well where traffic flows are below 100 vehicles per hour (paragraph 7.2.14). We would note that there is no definitive shared space design. Each road and street is different and the way it performs will depend on its individual characteristics and features and how they work in combination.

#### Existing network of footways / access to schools and facilities

- 11.38.9 At the northern end of Send Hill, the road has footways on both sides, with that on the southern side extending to the public footpath near to the school, and then running parallel to Send Hill. Further south on Send Hill, there is a short (60m) section of footpath on the northern side of Send Hill approximately 40 metres from the proposed site access. There are no footways connecting directly to the proposed site access.
- 11.38.10 Public footpaths run alongside the boundaries to the east, west and north of the site. There is a good network of public footpaths that connect the site to St Bede's Junior School, retail and other facilities along the A247 through Send and the medical practice on Send Barns Lane.

**Figure 11.9: Ordnance Survey extract showing site shaded in blue**



### Proposed trip generation

- 11.38.11 Policy A44 allocates the site for approximately 40 homes and two traveller pitches. Surrey County Council, in the Guildford Borough Proposed Submission Local Plan “June 2016”: Strategic Highway Assessment Report (Surrey County Council, June 2016) (hereafter the SHAR 2016), used a trip generation for the site of 42 two-way vehicle movements in the weekday average AM peak hour (0700-1000). The SHAR 2016 represents a robust “worst case” in terms of transport demand assumptions.
- 11.38.12 This forecast peak *period* flow has been adjusted to a peak *hour* flow, namely from 42 to 67 two-way vehicle movements in the AM peak hour (in PCUs). (This is based on a factor of 1.59, which is the identified TRICS factor for vehicular movements from a residential site in the AM peak from Table 2 in the report “A31 Blackwell Farm Link Road Highway Access Feasibility Design” (Mott MacDonald, May 2018) (appended as Question 11: Appendix 1). (It should be noted that each of the resulting new trips will either travel north or south on Send Hill, and so the site’s traffic impact on each half of Send Hill would be less than the total of 67 two-way vehicle movements.)
- 11.38.13 Future traffic flows on Send Hill, with the development, are therefore estimated to be below 97 vehicles per hour on either section north or south of the site access. (This includes the 67 two-way movements for the site’s trip generation.) This would not compromise the ability of the road to be used by a mix of pedestrians and vehicles in a shared surface arrangement as at present.
- 11.38.14 Accordingly, with its estimated future traffic flows, Send Hill will continue operate in a shared use arrangement by vehicles and pedestrians. (Even if traffic flows were to significantly exceed 100 vehicles per hour, it is unlikely to have an impact on road safety.)

### Proposed site access

- 11.38.15 The site fronts Send Hill along a stretch of the road. This will facilitate the design and realisation of an appropriate site access from the road, including for larger vehicles which may occasionally access the traveller pitches. At the planning application stage, a swept path analysis would be undertaken. This would use appropriate vehicle types to reflect typical traveller requirements.
- 11.38.16 Policy A44 includes a requirement numbered (11) for improved visibility to be provided at the junction of Send Hill with Potters Lane. This could be achieved using highway land.

### ***11.39 What would be the effect of the scheme on the amenity value of the footpath network passing through the site?***

- 11.39.1 There are no public footpaths running through the site. Instead, there is a footpath that currently runs along the eastern and western edge of the site. There is a further footpath to the north that runs east to west however this is located a short distance away from the site boundary. There would therefore be an inevitable effect on the

visual amenity of these two paths if the land were to be developed as the rural outlook on the eastern path would be lost and the western footpath would now run along edge of the village.

- 11.39.2 However, it is considered that careful design of the development, and a potential buffer between the footpaths and the proposed development, would lessen the visual impact to the rural feel and the views that walkers currently enjoy.

**11.40 *Are there exceptional local circumstances that justify the release of this site from the Green Belt?***

- 11.40.1 This response should be read alongside the Council's response to *Question 8: Green Belt (appendix 5)* of the Inspector's Initial Questions, which provides more detail of the exceptional circumstances. The local level exceptional circumstances that justify this site is the limited harm that this small village extension would have on the wider Green Belt given its location on a low sensitivity land parcel. This site is also able to accommodate traveller pitches for which there is an identified need for and a lack of suitable and available alternative sites. The site is also able to contribute towards meeting housing need early in the plan period.