

# **Guildford Borough Council**

## **Responses to Initial Questions 1 – 8**

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## Question 1 - Calculating the objectively assessed need for housing

*I note the housing affordability section in the SHMA addendum.*

- (a) However please will the Council have regard to the ONS statistics here which indicate a sharp deterioration in affordability ratios in Guildford from 2014 to 2016.*
- (b) I cannot see any analysis to demonstrate that the proposed 9% uplift to the OAN based on household formation in the 25-34 age group can reasonably be expected to improve overall housing affordability. The Council will be aware that an uplift based on similar principles was rejected at the Waverley Local Plan examination on the basis that it could not be demonstrated to improve affordability as advised by the PPG.*
- (c) Moreover, the level of identified affordable housing need is exceptionally high.*
- (d) I invite the Council to produce a paper to ascertain the degree of uplift that needs to be applied to the OAN starting point which can reasonably be expected to improve market housing affordability and deliver as many as possible affordable homes. This should be a “policy off” analysis.*

### Summary

- 1.1 Given that this question relates primarily to the SHMA, the Council’s response has been prepared with input from GL Hearn. (For purposes of analysis and reference only the question has also been subdivided.)
- 1.2 In summary, the Council:-
  - (a) has had regard to the ONS statistics as requested but for the reasons given in paragraphs 1.16 – 1.18 below does not consider further adjustment requires to be made.
  - (b) notes that the SHMA Addendum does not propose uplift solely by reference to household formation rates. Overall, it provides an uplift of 17% to the starting point household projections, by comparison to Waverley’s original proposal to uplift by only 5%.
  - (c) agrees that the level of affordable housing need is high. However, the Council contends that, for the reasons given below in paragraphs 1.29 – 1.32, the uplift of 17% will make an appropriate contribution to improving housing affordability and affordable housing delivery.
  - (d) has applied, in this paper, by way of a cross check, independent of its primary analysis contained in the SHMA and further discussed 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 16.5% uplift, see paragraphs 1.33 to 1.49 below.
- 1.3 The paper also draws attention to revised ONS Mid-Year Population Estimates.

## Introduction

- 1.4 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).
- 1.5 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.
- 1.6 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).
- 1.7 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).
- 1.8 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).
- 1.9 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>1</sup>.
- 1.10 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 support additional migration and household formation. The SHMA first makes a 4% upward adjustment through increasing in-migration to Guildford (raising

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<sup>1</sup> This was an increase from 517 dpa identified in the 2015 SHMA, see paragraph 2.2 of the 2017 Addendum.

the OAN to 579 dpa<sup>2</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.

- 1.11 To this figure, secondly, a 9% adjustment to headship rates is also applied (raising the OAN further to 631 dpa<sup>3</sup>) enabling higher household formation amongst younger households as well. Again, this will contribute to increasing the supply of both market and affordable housing.
- 1.12 Then a further adjustment is 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>4</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.
- 1.13 The aggregate impact is a combined adjustment of 17%<sup>5</sup> on the starting point demographic projections in drawing conclusions on Guildford's OAN.
- 1.14 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.
- 1.15 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**

- 1.16 The Council is aware that there was deterioration in the affordability ratio between 2014-16. The data indicates that the median (workplace-based) house price/income ratio<sup>6</sup> increased from 11.0 to 12.0; and the LQ ratio increased from 10.8 to 12.2. The relevant figures are set out in Table 1.

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<sup>2</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>3</sup> Figure 16 as taken forward in paragraph 8.17 of the Addendum SD-003.

<sup>4</sup> See paragraph 7.14 as taken forward to paragraph 8.20 of the Addendum SD-003

<sup>5</sup> As identified at paragraph 8.21 of the Addendum

<sup>6</sup> As referred to in the 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

**Table 1: Change in LQ Ratio (Workplace-based) in Guildford, 2014-16**

|        | 2014 | 2015 | 2016 |
|--------|------|------|------|
| Median | 11.0 | 11.2 | 12.0 |
| LQ     | 10.8 | 10.9 | 12.2 |

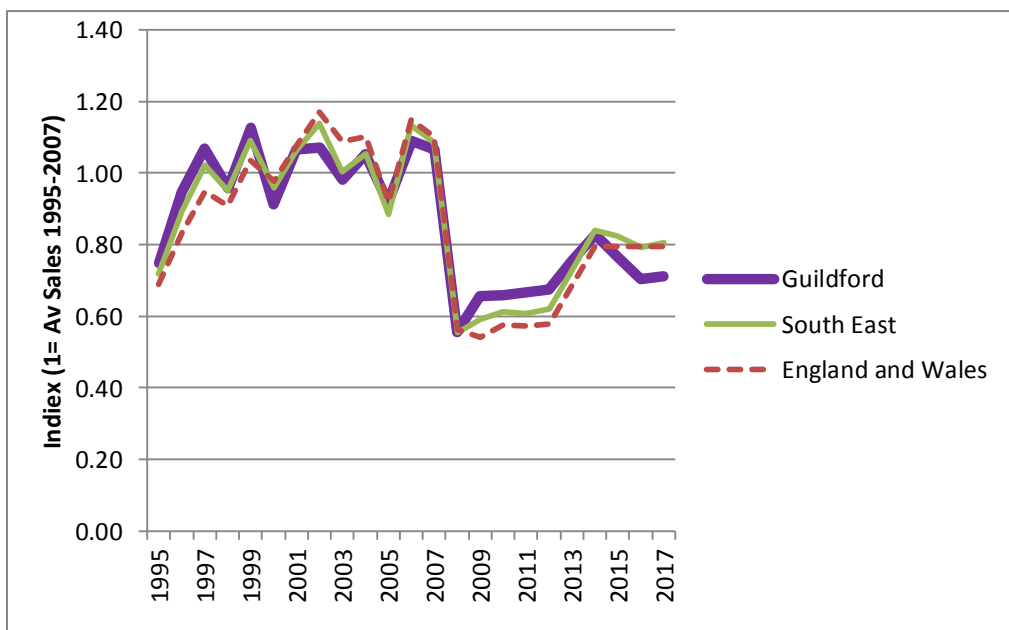
Source: ONS Housing Affordability Dataset, March 2017

- 1.17 However the Council 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, as this is the base date of the plan.
  - (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.
- 1.18 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

- 1.19 The deterioration in the affordability ratio between 2014-16 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.

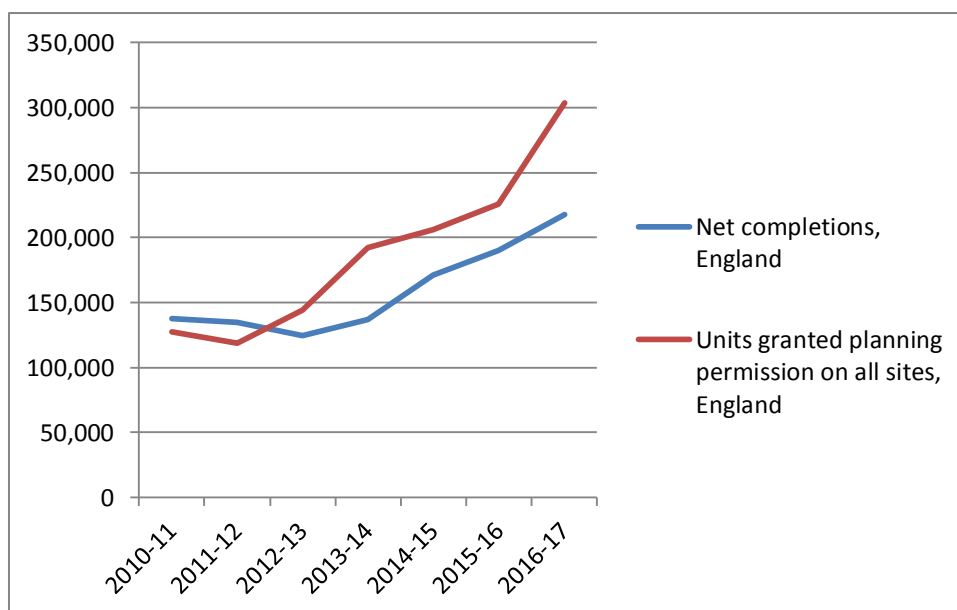
**Figure 1: Indexed Trend in Sales of Market Housing**



Source: Based on HM Land Registry Sales Data

1.20 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 Table 2 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.

**Table 2: Trends in Permissions Granted and Dwelling Completions, England**



Source: CLG Housing Statistics (Table 120)

1.21 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

1.22 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.

1.23 In considering the deterioration in the affordability ratios between 2015-16 (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

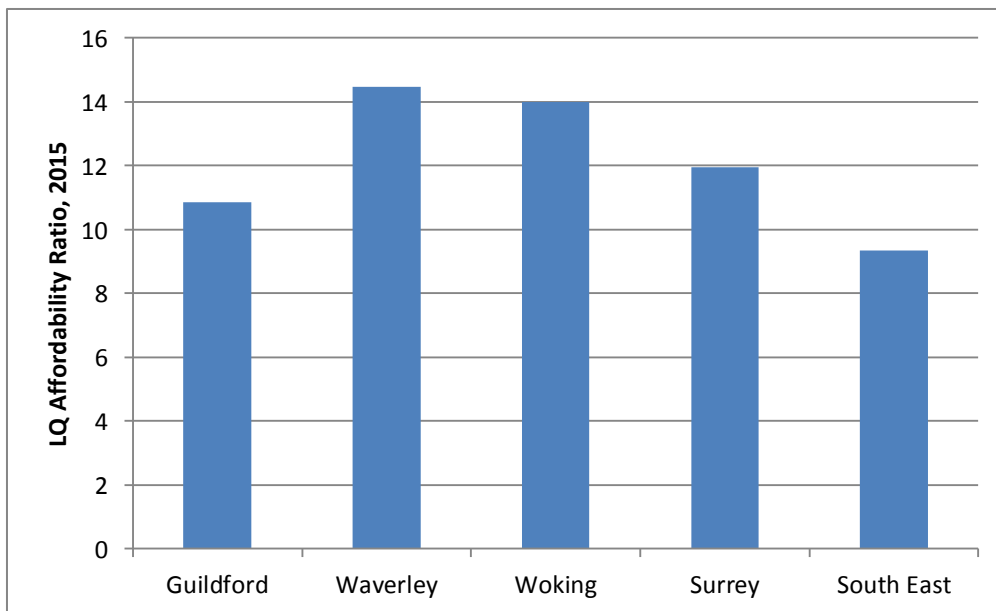
(294 dwellings or 55% below OAN). In the context of this under-delivery in 2015-16, it is quite understandable that affordability has deteriorated.

- 1.24 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

- 1.25 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.
- 1.26 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: LQ Affordability Ratio, 2015**



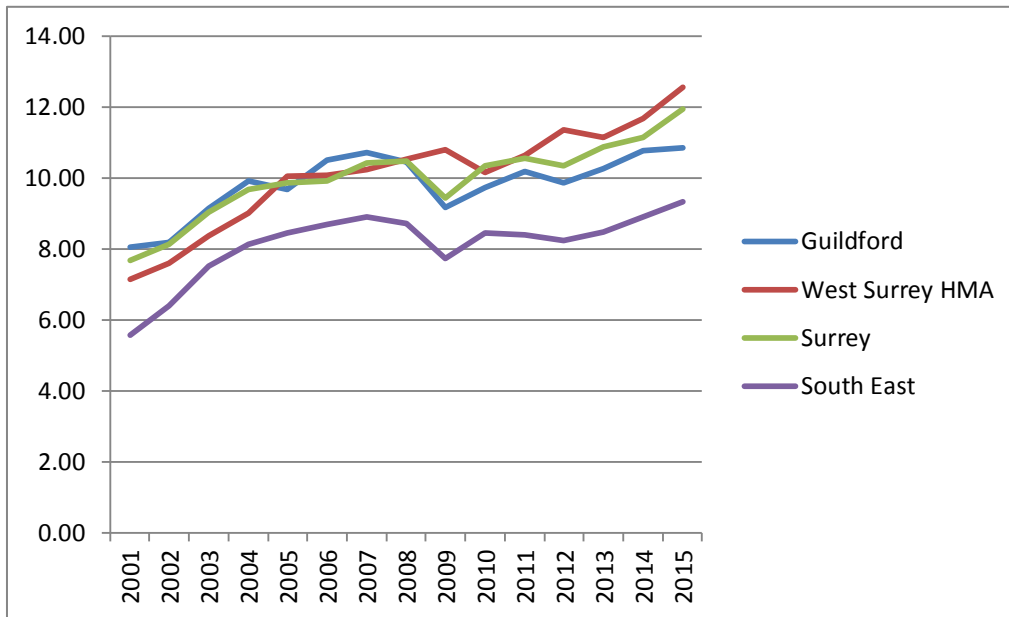
Source: ONS Housing Affordability Dataset, March 2017

#### Considering Longer-Term Trends

- 1.27 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 3: LQ House Price-Income Ratio**



Source: ONS Housing Affordability Dataset, March 2017

- 1.28 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 3: 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**

- 1.29 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).
- 1.30 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>7</sup>

- 1.31 It is also important to recognise that market housing costs (and 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>8</sup>
- 1.32 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**

- 1.33 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>9</sup>; the 2016 Redfern Review; and 2017 House of Lords Select Committee on Economic Affairs report on *Building more homes*.
- 1.34 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, and it is clear that there are a range of factors which impact on house prices – including earnings growth, interest rates and indeed market expectations.
- 1.35 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.
- 1.36 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.

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<sup>7</sup> 237 concealed and homeless households. This is derived from the detailed modelling which informed Table 24 in the Addendum SD-003

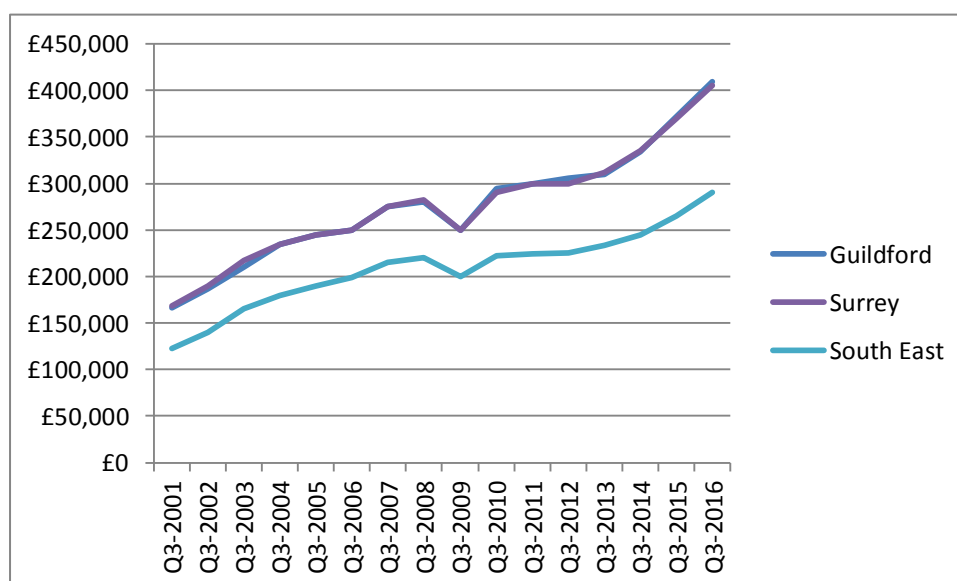
<sup>8</sup> The evidence shows that whilst lower quartile house prices have grown by 6.8% pa between 2011-16, lower quartile rents in the Borough have grown much more slowly by 2.5% pa. Using the affordable housing needs modelling to undertake a sensitivity analysis, a reduction in LQ rents by 10% would reduce the affordable housing need by 15% from 517 dpa to 439 dpa

<sup>9</sup> OBR Working Paper No6: Forecasting House Prices, 2014

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

- 1.37 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.
- 1.38 Trends in median house prices show a strong correlation to those across Surrey as a whole – indeed they almost precisely match (see Figure 3 below). There is a close correlation to price trends across the South East more widely.
- 1.39 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.
- 1.40 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 4: Correlation between Median House Price Trends in Guildford, Surrey and South East England<sup>10</sup>**



Source: Based on HM Land Registry Data

- 1.41 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

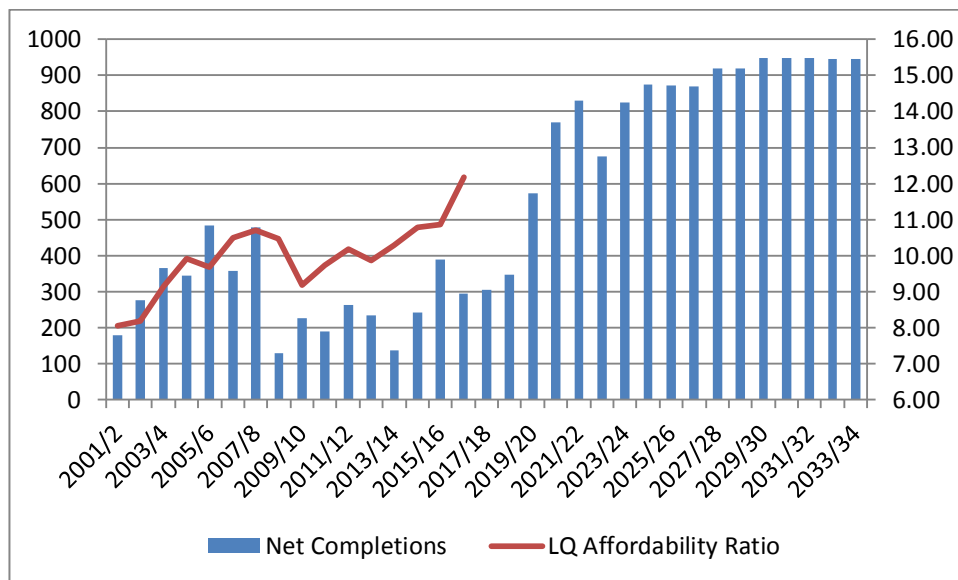
<sup>10</sup> This shows actual price trends rather than price growth in real terms

which the supply-price relationship works. A sustained increase in housing supply across the region as a whole is needed.

### Improving Affordability in Guildford

1.42 It is in this context in which it is appropriate to return to look at Guildford. Historically housing supply in Guildford has averaged less than 300 dpa. Average net completions 2001-17 have averaged 287 dpa. The chart below shows the trajectory assumed in the Local Plan.

**Figure 5: Housing Trajectory relative to Historical Delivery in Guildford Borough**



1.43 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 as a whole (2015-34), the level of housing delivery which is 2.7 times that delivered historically.

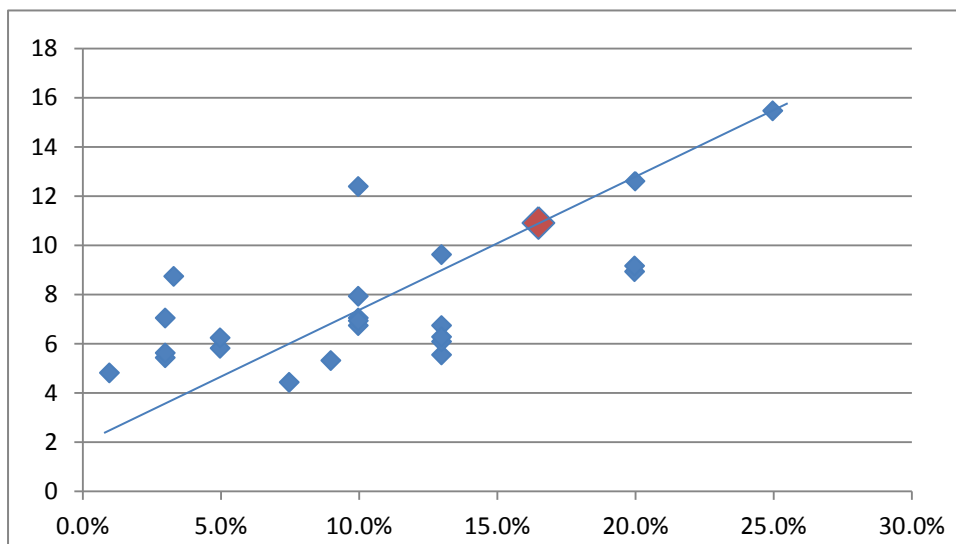
1.44 It is not possible to be precise as to the impact which this will have on house prices in the Borough, however the Council considers that this tripling of housing delivery rates will significantly impact on market expectations and perceptions of house price growth at the local level, which will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

1.45 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

- 1.46 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.
- 1.47 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>11</sup>
- 1.48 Figure 6 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 6: Benchmarking Affordability in Guildford against Market Signals Adjustments Elsewhere**



- 1.49 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.

### Revised ONS Mid-Year Population Estimates

- 1.50 Also relevant to the considerations raised by Question 1 is that on 22<sup>nd</sup> March 2018, ONS issued a revised set of Mid-Year Population Estimates for mid-2012 to mid-2016. These take account of methodological improvements which ONS has implemented to create a new series of estimates which roll forward the 2011 Census population. For Guildford, the population estimates have been revised downwards;

<sup>11</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

with the mid 2016 now estimated at 146,845: 1,175 persons lower than ONS had previously expected.

- 1.51 The Council and GL Hearn are considering the implications of this, and note that new 2016-based Sub-National Population Projections are due to be issued by ONS in May/June. At this point, the evidence suggests that migration over the input period to the 2014-based Sub-National Populations could have been slightly overestimated. This is a consideration in respect of the 'baseline' to which the market signals adjustment is applied.

## Question 2 - Unmet housing need in the housing market area

*Notwithstanding the advice in the NPPF and PPG, the submitted plan makes no allowance for meeting unmet housing need in the HMA. I understand that the HMA authorities intend to work together to address future shortfalls, but meanwhile there is a present need and it needs to be addressed now. In Waverley the allowance that was included in the plan following modifications to meet unmet need arising in the HMA was 83 dpa. This figure would have to be adjusted in the case of Guildford to allow for differing plan periods. I invite the Council to produce a paper to demonstrate how unmet housing need in the HMA will be accommodated.*

### Summary

- 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.

### Introduction

- 2.1 This paper seeks to explain why the Submission Local Plan does not make an allowance for meeting unmet needs in the HMA, and in particular those relating to Woking. The justification includes an analysis of:
- the requirements of national policy
  - Guildford's constraints to meeting needs
  - the period during which the unmet need exists
  - the scale of unmet need arising from Woking
  - a likely review of Woking's Core Strategy
  - the appropriateness of further Green Belt release to meet unmet need
- 2.2 Please note there is strong overlap between Question 2 and Question 3. Both responses therefore should be read alongside each other.

### Requirements of national policy

- 2.3 The NPPF requires that local planning authorities boost significantly the supply of housing and ensure that local plans meet “the full, objectively assessed needs for market and affordable housing in the housing market area, **as far as is consistent with the policies set out in this Framework**” (our emphasis)<sup>12</sup>.
- 2.4 One of the tests of soundness against which the Submission Local Plan will be assessed is that it is positively prepared. Namely that the “plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities **where it is reasonable to do so and consistent with achieving sustainable development**” (our emphasis)<sup>13</sup>.
- 2.5 The NPPG goes on to clarify that “the duty to cooperate is not a duty to agree and local planning authorities are not obliged to accept the unmet needs of other planning authorities if they have robust evidence that this would be inconsistent with the policies set out in the National Planning Policy Framework, **for example policies on Green Belt**, or other environmental constraints” (our emphasis)<sup>14</sup>.
- 2.6 The consideration of whether Guildford should therefore be making an allowance for meeting unmet needs arising from within the housing market area (HMA) depends on whether a) it is reasonable to do so and b) doing so would be consistent with achieving sustainable development.

### Guildford’s constraints to meeting needs

- 2.7 Guildford borough is subject to a number of significant constraints to development. This includes 89% of the borough consisting of Green Belt, significant areas covered by either AONB or the Special Protection Area, and high flood risk areas particularly in the town centre. This currently places a significant restriction on the amount of housing that can come forward prior to the plan’s adoption, which has consequences for the housing requirement in the first five years. These constraints create an extremely challenging backdrop to identifying sufficient sites to meet Guildford’s needs, in particular in relation to early delivery. This is discussed in more detail in the response to *Question 3: Housing trajectory*.
- 2.8 In developing its spatial strategy, the Council applied a sequential approach to the spatial hierarchy. This sought to direct development to the most sustainable locations for growth. At the top of the spatial hierarchy are brownfield sites, including previously developed sites in the Green Belt, and sites within existing urban areas and villages. Maximising suitable development opportunities in these areas combined with existing completions, permissions and allowances for windfall and rural exception sites only met 56% of Guildford’s objectively assessed need (OAN) of 654 homes per year.

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<sup>12</sup> NPPF, paragraph 47, bullet 1

<sup>13</sup> NPPF, paragraph 182, bullet 1

<sup>14</sup> NPPG, Paragraph: 021 Reference ID: 9-021-20140410



- 2.9 The borough consists of 2% Countryside Beyond the Green Belt (CBGB) and this was considered the next most appropriate location for growth. However, maximising sustainable growth in this location still only met 65% of Guildford's need. At a strategic level, it was considered that the consequences of meeting only this proportion of Guildford's need constituted the exceptional circumstances to justify amending Green Belt boundaries. The Council therefore sought to maximise sustainable development opportunities from Green Belt sites which yielded a further 6,150 homes. The approach to sites in the Green Belt is discussed in more detail in the answer to *Question 8: Green Belt*. These Green Belt sites appear in the spatial hierarchy as follows:
- Guildford urban area extensions (3,350 homes)
  - New settlement at Wisley airfield (2,000 homes)
  - Extensions to villages (approximately 800 homes)
- 2.10 In addition to seeking to meet its needs, the Council has also taken measures to maximise early delivery. This includes the allocation of a number of smaller Green Belt sites predominantly around villages, which are at the bottom of the spatial hierarchy. An important part of the "exceptional circumstances" justification for these sites is that they are necessary for early delivery as they are all projected to be completed within the first five years.
- 2.11 In addition to these smaller sites, all the strategic Green Belt sites make a valuable contribution to early delivery as well as the overall requirement. Notwithstanding these measures, the Council are unable to sustainably accommodate its own full housing requirement in the early years of the plan. This justifies the proposed phased approach to housing delivery contained in Policy S2 of the plan (discussed in more detail in the answer to *Question 3: The housing trajectory*).
- 2.12 Whilst the Council is unable to meet its requirement in the early years without relying on a stepped approach, it is acknowledged that the Submission Local Plan includes a potential supply of approximately 1,700 homes<sup>15</sup> over and above the housing requirement of 12,426 homes. However, this additional provision is considered to be necessary to ensuring the plan meets its housing requirement, and is positively prepared and effective (this is discussed in more detail in paragraphs 4.187 to 4.192 of the Housing Delivery Topic Paper). It enables the Council to maximise all sustainable development opportunities, particularly those that are able to deliver early, whilst also providing sufficient flexibility should sites not deliver as planned, in accordance with the NPPF<sup>16</sup>.

#### Period during which the unmet need exists

- 2.13 Woking has an adopted Core Strategy (2012) which includes an annual target of 292 homes per annum (pa) between 2010 and 2027. This represents a shortfall of 225 homes pa against their OAN in the West Surrey SHMA (2015) of 517 homes pa. The shortfall is calculated from 2013/14 (the baseline in the West Surrey SHMA) until

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<sup>15</sup> This is now approximately 2,000 homes as a result of two recent planning appeals

<sup>16</sup> NPPF, paragraph 14, bullet 2

2026/27 (the end of the Woking Core Strategy plan period). For the purposes of Guildford's plan preparation, an unmet need of 3,150 homes has been assumed ( $225 * 14$  years between 2013/14 and 2026/27 = 3,150). This is consistent with the level of unmet need assessed as part of Waverley's plan preparation<sup>17</sup>. However, this is now considered to be an over-estimate of the likely level of unmet need (discussed in more detail below).

- 2.14 Through their Local Plan Part 1 examination process, Waverley increased their housing requirement to meet 50% of Woking's annual under-provision of 225 homes pa. This was calculated as an additional 83 homes pa to Waverley's annual target ( $3,150/2 = 1,575$ .  $1,575/19$  years for Waverley's plan period = 83). As clarified on page 10 (footnote 9) of their Inspector's Report, the figure was 83 pa rather than 112 pa ( $225/2$ ) due to the total unmet need being annualised over the whole of Waverley's plan period (to 2032) rather than the period within which the need is identified (to 2027). Given that Waverley has spread the unmet need allowance across their plan period (to 2032) rather than over the period in which the need is identified (to 2027), in reality only approximately 75% of the unmet need is being met during Woking's Core Strategy plan period 2013 – 2027 (1,162 homes) with the remaining 25% (415 homes) being met post their plan period (2028 – 2032). In total, this provides for 1,577 homes due to rounding.
- 2.15 As set out above, Guildford's plan may deliver more homes than are strictly necessary to meet Guildford's need. However, any flexibility of delivery, which could enable a possible contribution to unmet needs, would only arise towards the end of the plan period due to the strategic sites, which have longer build out rates and require the delivery of infrastructure to facilitate development. Any flexibility of delivery would therefore occur beyond Woking's plan period of 2027 and therefore after the period within which unmet need is identified. By contrast with Waverley's contribution of 25% post Woking's plan period (see above), Guildford's potential contribution would be in effect 100% post Woking's plan period and that is not considered reasonable. Given Guildford's significant issues with early delivery, should any further development potentially come forward within the early years (pre 2027), the Council consider it inappropriate in terms of the NPPF and unreasonable that it should contribute towards unmet need of neighbouring authorities rather than contributing towards meeting Guildford's own housing need. However, any flexibility of delivery above Guildford's OAN that may occur post 2027 could enable a possible contribution to meeting unmet housing needs in the HMA.
- 2.16 In addition to this flexibility of delivery towards the end of the plan period, three of the strategic sites are also expected to be phased beyond Guildford's plan period. In total 1,100 are projected to be delivered post 2034 from SARP (site allocation A24), Gosden Hill (site allocation A25) and Blackwell Farm (site allocation A26). Given the requirement to review plans every five years, there is too much uncertainty to predict what element of unmet need will remain at that point in time. The Council considers it more appropriate to apportion any potential additional supply, in the context of planned delivery in Waverley and Woking, as part of a future review of Guildford's

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<sup>17</sup> Both councils used consistent figures in the respective Sustainability Appraisals

Local Plan. At that time, there will be a reassessment of the OAN within the HMA and Woking will have established the extent to which they can meet needs over their new plan period, which is likely to be over a period more consistent with that of Guildford and Waverley.

- 2.17 The new legal requirement to update plans after five years will also be applicable to Guildford as part of a future review of the Strategy and Sites DPD. The uncertainty regarding Guildford's future need combined with the uncertainty regarding the extent to which unmet needs will remain post 2027, means that any flexibility in supply within this plan will make a necessary contribution towards meeting Guildford's future need over this period. It would be unreasonable for Guildford to be meeting some of Woking's needs in a time period where the need is unknown.

#### Scale of unmet need arising from Woking

- 2.18 As set out in the Waverley Local Plan Part 1 Examination Inspector's Report (footnote 9), the latest 2014-based household projections suggest that the scale of unmet need could in fact be less than the 225 homes pa identified in the West Surrey SHMA, which was underpinned by the 2012-based household projections.
- 2.19 In addition, the Government recently consulted on the new standard methodology for calculating local authorities' housing need<sup>18</sup>. The new methodology proposes to use a demographic baseline that is the annual average household growth over a 10 year period to 2026.
- 2.20 The new methodology indicates a potential OAN of 409 homes pa for Woking for the period 2016 – 2026. It follows that both the new methodology and the 2014-based house projections point to a likely lower level of unmet need than was previously assessed within Waverley's examination.
- 2.21 Whilst the post 2027 implications are not known, it is possible to provide an illustration of the way the new methodology may be applied. Given that any potential contribution Guildford might make to Woking's need would be in this period, it is considered appropriate that this new methodology should be used in this context.
- 2.22 Using the new methodology OAN (of 409dpa) would indicate an underprovision of 117 homes pa (409-292). This would result in a total unmet need of 1,638 if one were to use the same base date as the West Surrey SHMA (117 \* 14 years between 2013/14 and 2026/27). This compares to an unmet need of 3,150 as has previously been assumed.
- 2.23 Taking account of the additional 1,577 homes that Waverley has provided for within their recently adopted Local Plan Part 1 to accommodate Woking's unmet need would leave a residual figure of only 61 homes remaining (1,638-1,577). Even if however it was considered appropriate to meet all unmet need within the period it is

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<sup>18</sup> <https://www.gov.uk/government/consultations/planning-for-the-right-homes-in-the-right-places-consultation-proposals>

identified (namely excluding the 25% of Waverley's unmet need provision that is post 2027), then this would leave a residual figure of 476 homes to 2027 (1,638 - 1,162<sup>19</sup>).

- 2.24 Moreover, regard should be had to Woking's latest housing land supply position statement which is dated 1 April 2016<sup>20</sup>. This identifies that over the period 2016/17 – 2020/21, the requirement is 1,714 homes (including 5% buffer and undersupply). In contrast, the forecast number of homes that is anticipated to be delivered over this period is 2,530 homes. This is a potential oversupply against that requirement of 816 net additional dwellings. The possibility that Woking might be able to deliver more housing than that set out within their Core Strategy is acknowledged in the Waverley Local Plan Part 1 Examination Inspector's Report. Combined these factors therefore cast doubt regarding the extent of the unmet need that is likely to remain within the HMA.

#### Likely review of Woking's Core Strategy

- 2.25 Additionally, Woking's Core Strategy is more than five years old (as at December 2017). There is now a legal requirement that a review of this document should begin immediately<sup>21</sup>. As part of this review, Woking will need to explore the extent to which they can meet the revised OAN. This is likely to require a reconsideration of the constraints that exist within Woking, including the Green Belt. The current Green Belt review sought only to identify sufficient land to meet the Core Strategy target and potential safeguarded land. A review of the plan now will require a reassessment of this and whether the adverse impacts of meeting a greater proportion of need on the Green Belt would significantly and demonstrably outweigh the benefits of doing so.

#### Appropriateness of further Green Belt release to meet unmet need

- 2.26 Given the extent to which Guildford's need is proposed to be met through the release of Green Belt sites, the Council do not consider that requiring additional Green Belt sites in order to meet Woking's need, is reasonable or consistent with achieving sustainable development. Notwithstanding the above factors, to require Guildford to meet unmet needs from Woking, would simply be removing the need for Woking to undertake a comprehensive review of their Green Belt boundary in the context of their housing need whilst putting pressure on Guildford to have to consider removing additional land from its Green Belt. Without a comprehensive review by Woking, it is not considered there are exceptional circumstances to reduce the extent of the Green Belt in Guildford further.

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<sup>19</sup> See paragraph 2.14

<sup>20</sup> Available online at <http://www.woking2027.info/ldfresearch/hlsps/fiveyearsupply2016>

<sup>21</sup> Reg 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires local planning authorities to complete a review of their Local Plans within five years of the date of their adoption. This regulation came into force on 6 April 2018 (see Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2017/1244, Reg 1(2)). In accordance with s.17(6B) of the Planning and Compulsory Purchase Act 2004, following any such review a local planning authority must consider whether to revised the Local Plan and, if they decide not to do so, must publish reasons for their decision

### Question 3 - The housing trajectory

*I am very concerned about the proposed stepped housing trajectory which indicates that the plan will deliver much lower numbers of homes in its early years than are actually needed. This appears to be an unacceptable aspect of the plan and the Council needs to consider the steps that should be taken to improve housing delivery in the earlier years of the plan. Please will the Council produce a paper on this subject, with an amended trajectory, and the relationship of the trajectory to the A3 improvements and other infrastructure projects needs to be explained.*

#### Summary

- 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 half of what is needed (approximately 300 homes per year) until the plan is adopted and sites are released from the Green Belt.
- 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 removed were done so 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.
- It is considered that 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.

- 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.

## Introduction

- 3.1 This paper seeks to explain why the Submission Local Plan cannot not deliver more homes in the early years of the plan and why the Council firmly believes that a stepped trajectory is justified. The issues covered include an analysis of:
- the relationship between the Annual Housing Target in Policy S2 and the actual housing delivery projected in the housing trajectory
  - the projected five year housing requirement
  - supply over the plan period and the efforts to maximise sustainable early delivery
  - potential challenges to additional early delivery as a result of existing safety and congestion issues along the A3 through Guildford
  - why an amended trajectory is unrealistic
- 3.2 Please note there is strong overlap between Question 2 and Question 3. Both responses therefore should be read alongside each other.

## The relationship between the Annual Housing Target in Policy S2 and the actual housing delivery projected in the housing trajectory

- 3.3 The Submission Local Plan (Policy S2) proposes a stepped annual housing target that gradually increases over time. It is important to note that for the period preceding the expected adoption of the plan – the housing target is 654 homes per year (Guildford’s OAN). This is the figure against which delivery is currently assessed for the purposes of calculating the Council’s five year supply of homes. The Submission Local Plan proposes to introduce a stepped annual housing target which will only apply when the Local Plan has successfully pass through the examination process and, in accordance with the NPPG, the housing requirement figures in an up-to-date adopted Local Plan can be used as the starting point for calculating the five year supply<sup>22</sup>.
- 3.4 In order to make this clear it is proposed to modify the table in S2<sup>23</sup> as follows.

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<sup>22</sup> NPPG, Paragraph: 030 Reference ID: 3-030-20140306

<sup>23</sup> It is proposed to move this amended table from the policy itself to the Reasoned Justification (please see the answer to *Question 4: The spatial development strategy* for further changes to Policy S2)

| Period        | Year    | Annual Housing Target | Annual Actual/ Projected Supply |
|---------------|---------|-----------------------|---------------------------------|
| Pre-adoption  | 2015/16 | 654                   | 387                             |
|               | 2016/17 | 654                   | 294                             |
|               | 2017/18 | 654                   | 306                             |
|               | 2018/19 | 654                   | 348                             |
| Years 1 - 5   | 2019/20 | 450                   | 572                             |
|               | 2020/21 | 450                   | 769                             |
|               | 2021/22 | 500                   | 829                             |
|               | 2022/23 | 500                   | 675                             |
|               | 2023/24 | 500                   | 824                             |
| Years 6 - 10  | 2024/25 | 550                   | 874                             |
|               | 2025/26 | 600                   | 871                             |
|               | 2026/27 | 700                   | 870                             |
|               | 2027/28 | 700                   | 919                             |
|               | 2028/29 | 700                   | 919                             |
| Years 11 - 15 | 2029/30 | 800                   | 949                             |
|               | 2030/31 | 810                   | 947                             |
|               | 2031/32 | 850                   | 947                             |
|               | 2032/33 | 850                   | 946                             |
|               | 2033/34 | 850                   | 945                             |
| <b>TOTAL</b>  |         | <b>12,426</b>         | <b>14,191</b>                   |

**Table 1: Amended extract from Policy S2 showing the Annual Housing Target compared to the projected annual supply from the Housing Trajectory** (which is projected supply information currently found at Appendix 4 to the Housing Delivery Topic Paper).

- 3.5 Whilst this is currently labelled as the Annual Housing Target, it is important to clarify that this target is not the number of homes projected to be delivered within each of these years. Instead, it is the target number of homes against which delivery will be measured in order to calculate the rolling five year supply of housing. This is discussed in more detail below. As clearly demonstrated in the table above, actual projected delivery is significantly higher in each year. In fact, annual delivery following adoption exceeds the OAN of 654 homes per annum in each year except for Year 1. It is projected to be 769 homes in Year 2 rising to over 900 homes per year from 2027 onwards. The Council considers the housing trajectory to be ambitious and represent a significant step change in delivery which has on average been in the region of 300 (this is discussed in more detail below).
- 3.6 Delivery is expected to be comparatively low in Year 1, although this is still expected to be 572 homes which is a significant uplift compared to past trends that are expected to continue until the new plan is adopted. The reason for this is that the Council do not consider that the early delivery Green Belt sites can realistically

deliver in Year 1. Even if a planning application is progressed alongside the Local Plan examination as the plan begins to carry more weight in decision taking, it will nevertheless take the developers some time to prepare these greenfield sites for development and begin construction. The scale and complexity of a site have a direct bearing on the time it takes to achieve planning permission and undertake the initial construction phase. For this reason, the Council expects that the smaller Green Belt sites will deliver homes by Year 2 whilst the strategic sites will only begin delivering by Year 4<sup>24</sup>. Please see Appendix 1 for the housing trajectory and a detailed breakdown of when sites are expected to be delivered. In order to provide more clarity and emphasise the level of development that the plan is seeking to provide, a modification is proposed to the Submission Local Plan to include the Housing Trajectory within the plan. By forming part of the Local Plan, it will clearly demonstrate a positive approach to housing delivery and enable more effective monitoring of the plan.

### The projected five year housing requirement

- 3.7 Housing delivery in Guildford is currently severely constrained. The borough consists of 89% Green Belt, 9% urban area and 2% is land currently designated Countryside Beyond the Green Belt (CBGB). The northern part of the borough is subject to significant development constraints in relation to the Thames Basin Heaths Special Protection Area (SPA) precluding any new homes within 400m of it. The southern half of the borough is also constrained as it forms part of the Surrey Hills Area of Outstanding Natural Beauty (AONB) where national policy states that planning permission for major development should be refused, except in exceptional circumstances. Furthermore, Guildford town centre is subject to significant flood risk given its proximity to the River Wey. The lack of suitable and available land has resulted in past annual completions that are lower than previous housing targets and significantly lower than the OAN of 654 homes per year (see Table 2 below).
- 3.8 Since the publication of the NPPF, CBGB land has been subject to increased development pressure given the lack of a five year supply of housing and the fact it does not carry the same presumption against development that is afforded to Green Belt land. However whilst permissions have been granted, completions are currently stalled due to the lack of available Suitable Alternative Natural Greenspace (SANG). Approximately 700 homes are currently permitted in Ash and Tongham but are subject to a Grampian condition precluding their delivery until sufficient SANG is available to mitigate their impact on the SPA. SANG<sup>25</sup> has been granted permission and the Council is currently liaising with the landowner to bring it on line, however the combined impact of this, and the other development constraints discussed above, has resulted in a significant backlog of homes which the emerging Local Plan is attempting to address.
- 3.9 Moreover, the backlog is calculated from the beginning of the plan period (2015). The accrued backlog is expected to continue to increase until site allocations, currently

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<sup>24</sup> There is the potential that Wisley airfield might deliver earlier than this dependent upon the outcome of the current appeal

<sup>25</sup> For more information on SANG provision please see Chapter 4 of the Infrastructure Delivery Plan



constrained by the Green Belt, are to be able to come forward and begin delivering homes. It is estimated that at the point of adoption the accrued backlog will be approximately 1,300 homes.

- 3.10 National guidance states that “*local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period **where possible** (our emphasis)<sup>26</sup>”*. To do so within the Guildford context would require the equivalent of an additional two years’ worth of housing to be built within the first five years of the plan (namely seven years’ worth of housing in five years). It is considered that this is unrealistic, however desirable it might be given in particular the extent of backlog and the increase in delivery that would be required - as is now explained.
- 3.11 The NPPF also requires that local planning authorities identify sufficient sites to meet a five year supply of housing with an additional buffer (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land. Whilst usually set at 5%, “where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20%”<sup>27</sup>.
- 3.12 The absence of a housing target for Guildford in an adopted development plan makes the assessment of persistent under delivery challenging. However, since 2008/09 completions have been persistently less than the draft South East Plan housing number (322 homes per year), and the adopted South East Plan housing number (422 homes per year), albeit this was successfully challenged and subsequently deleted. In all but one of the last nine years, completions have been less than 300 homes per year. The spike in completions in 2015/16 at almost 400 homes is due primarily to completions in Ash and Tongham on sites that were not subject to a Grampian condition related to the availability of SANG. Whilst this is a notable increase, it remains less than the adopted South East Plan housing requirement, and less than current OAN (654 homes a year). The Council therefore has accepted it has a record of persistent under delivery meaning it should plan for a 20% buffer.

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<sup>26</sup> NPPG, Paragraph: 035 Reference ID: 3-035-20140306

<sup>27</sup> NPPF, paragraph 47

| Year  | Net completions |
|-------|-----------------|
| 06/07 | 357             |
| 07/08 | 478             |
| 08/09 | 130             |
| 09/10 | 227             |
| 10/11 | 190             |
| 11/12 | 262             |
| 12/13 | 234             |
| 13/14 | 137             |
| 14/15 | 242             |
| 15/16 | 387             |
| 16/17 | 294             |

**Table 2: Past annual completions**

- 3.13 The 20% buffer, brought forward from later in the plan period, is added to the five year requirement as well as any backlog. Given the significant level of backlog discussed above, the addition of a 20% buffer requires a further 1.5 years' worth of housing (rather than one year's worth of supply if there was zero backlog) to be built within the first five years of the plan. To adopt this method of calculating a five year supply of homes (a Sedgefield approach) would require a supply of homes sufficient to deliver the following five year requirement:

|   |  |
|---|--|
| 5 years' worth of housing need<br>(654 * 5) | 3,270  |
| + Backlog (2015 – 2019)                     | 1,281  |
| + 20% buffer                                | 910  |
| <b>Total</b>                                | <b>5,461 (or 1,092 homes pa)</b><br><b>(5,461 / 654 = equivalent 8.4 years' worth)</b> |

- 3.14 The Council recognises the benefits of meeting the backlog as quickly as possible and introducing greater choice to the market in order to address past performance issues. However, given the circumstances in Guildford, this results in an unfeasibly high five year requirement that the Council does not consider to be achievable. As set out above, the NPPG states that the backlog should be met in the first five years where possible. The Council do not consider it possible but has sought to maximise early delivery as much as possible consistent with the objective of achieving sustainable development and the NPPF requirement to significantly boost the supply of housing. This is discussed further below.

#### Supply over the plan period and the efforts to maximise sustainable early delivery

- 3.15 As part of developing the spatial strategy and the resulting distribution of growth, the Council has applied a spatial hierarchy (set out below) which seeks to sequentially direct development towards the most sustainable spatial locations. In doing so the Council has sought to maximise sustainable opportunities for growth within each spatial location until the point at which it is considered that the harm of providing

more would significantly and demonstrably outweigh the benefits of doing so. At this point, consideration is given to the next spatial location in the hierarchy to assess the contribution that could be gained through maximising this option. The spatial strategy adopts a brownfield first policy, including where appropriate previously developed land within the Green Belt. The following spatial locations were considered to be the most sustainable locations:

- Guildford town centre
- Urban areas of Guildford, and Ash and Tongham
- Within identified and inset villages
- Redevelopment of previously developed sites in the Green Belt

3.16 However maximising these sources of supply does not provide sufficient suitable and available sites to meet OAN. Combined with completions since 2015, outstanding planning permissions and trend based assumptions for windfall and rural exception sites, these spatial locations yield a housing supply of 6,921 homes or 56% of Guildford's OAN. This therefore justifies the assessment of the next set of spatial options to explore the level of sustainable development that could be directed here:

- Ash and Tongham urban extension (Countryside beyond the Green Belt)
- Guildford urban extensions (Green Belt)
- New settlement at the former Wisley airfield (Green Belt)
- Development around villages (Green Belt)

3.17 In terms of the second set of options, the Council has sought to maximise sustainable development on CBGB before exploring the extent to which Green Belt land should be used to meet needs. This reflects the national importance of maintaining the Green Belt and the need to have examined fully all other reasonable options for meeting identified needs first<sup>28</sup>. When exploring the extent to which Green Belt should be used, Guildford urban extensions and a new settlement are considered preferable to development around villages due to their ability to provide comprehensive mixed-use sites<sup>29</sup>. These strategic sites make a valuable contribution towards meeting overall housing need, whilst also contributing towards much needed early delivery in the first five years. They also provide a mix of uses that help meet other identified needs such as employment, and are of a scale that can facilitate the delivery of the necessary infrastructure that help support growth across a wider area (for example train stations, secondary schools, and so on).

3.18 Extensions to villages are at the bottom of the hierarchy. Whilst additional development directed to the more sustainable villages can help maintain facilities, services and vibrant communities, they are less sustainable than strategic sites given their rural nature and their limited ability to provide for a mix of uses or significant infrastructure improvements that can benefit a wider area.

3.19 The Green Belt and Countryside Study (GBCS) is a key piece of evidence, which has informed the site selection process. It consists of six volumes, prepared over a

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<sup>28</sup> The draft NPPF refers to this as part of assessing whether exceptional circumstances exist and is considered to be consistent with the Council's approach to developing the spatial strategy

<sup>29</sup> This is consistent with the NPPF which supports mixed use sites (see paragraphs 17, 38 and 58)

number of years. It is a comprehensive study, which does not seek to identify a specific level of development. Instead, it assesses a range of spatial strategy options and identifies a portfolio of sites that could be considered for allocation. Whilst the study first assesses the extent to which different parcels of land contribute towards the purposes of the Green Belt, the Green Belt sensitivity did not ultimately preclude the identification of potential development areas. Whilst the sensitivity of the Green Belt was a factor in identifying site allocations, with development focussed on those of lesser sensitivity, other sustainability factors were considered as part of the site selection process. The evaluation of exceptional circumstances to justify amending Green Belt boundaries, both generally and on a site-specific basis is discussed in more detail in the answer to *Question 8: Green Belt*.

- 3.20 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).
- 3.21 The West Surrey SHMA: Guildford Addendum (2017) provided an updated assessment of need incorporating the latest set of household projections and economic forecasts. This resulted in a lower OAN for Guildford than that contained in the West Surrey SHMA (2015).
- 3.22 The Council considered whether some of the supply proposed in the Regulation 19 Local Plan (2016), which was now in excess of what was needed to meet Guildford's OAN, could be used to help contribute towards early delivery or meeting Woking's unmet need. However, for a variety of planning reasons a number of sites (approximately 1,400 homes) are no longer considered appropriate for allocation. This is discussed in more detail in the Housing Delivery topic paper (paragraphs 4.22 to 4.34) but include the following reasons:
- sites no longer available during the plan period or available for general market housing
  - sites considered more appropriate to contribute towards meeting other non-housing needs
  - a site which, if developed, would cause significant harm to the Green Belt however great weight was given to the ability of the site to provide for a secondary school necessary to meet the education needs arising from development in the west of the borough. The school is now proposed on an alternative and preferable site thus removing the exceptional circumstances justifying its release from the Green Belt
  - a site designated a Site of Nature Conservation Interest (SNCI) with which development is considered incompatible
- 3.23 A further 600 homes were removed from the planned supply as a result of a more realistic phasing projection on what is likely to be capable of being delivered on two strategic sites to 2034 (300 homes each on Blackwell Farm and Gosden Hill Farm are now projected to be delivered post the plan period). However, the plan does not

seek to apply an artificial cap on the delivery of these sites should they be capable of being delivered sustainably in their entirety within the plan period.

3.24 The Housing Trajectory included in Appendix 1 of this Question 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>30</sup>
- A small site windfall allowance has been included across the plan period however this is discounted in the early years to avoid double counting with sites that already have planning permission<sup>31</sup>
- A small trend based allowance for Rural Exception Sites has been included across the whole plan period
- Guildford town centre sites are predominantly projected to deliver during the mid to late plan period due to the complexities of delivering brownfield sites and their availability for redevelopment
- 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 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 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

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<sup>30</sup> This is consistent with NPPF paragraph 47, footnote 11

<sup>31</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)

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, consistent with the evidence presented at the Public Inquiry, this site could deliver an additional 387 homes in the first five years and an additional 119 homes in the second five year period compared to the current projection.

- 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

3.25 The Council considers that its projections in the housing trajectory are ambitious yet realistic and reflective of the specifics of each site. To amend the trajectory with a more optimistic projection on each site, without any evidence justifying such an approach, would risk the Council's ability to maintain a rolling five year supply of homes should these sites not deliver at the revised rate which would undermine the principle of a plan-led approach.

3.26 The final potential source of supply is large windfall sites. 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). 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. Whilst each appeal included a range of considerations which affected the overall planning judgement, both decisions gave weight to the current lack of a five year housing land supply.

3.27 For the reasons set out above, the current severe lack of a five year supply (currently 2.36 years<sup>32</sup>) is inevitable given the constrained nature of Guildford borough and the high housing need. However once the new Local Plan is adopted, and Green Belt

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<sup>32</sup> This does not include the recent appeal decisions which will have helped to improve the position

boundaries are amended to enable a significant number of development opportunities to come forward, a rolling five year housing land supply should be established. The Council therefore considers that this source of supply is unlikely to be significant once the plan is in place and, given the constraints that will remain on land not allocated in the plan, it would not be appropriate to include a large site windfall assumption.

- 3.28 As set out above, the Submission Local Plan includes a range of different sources of supply, with the majority contributing in some way towards much needed early delivery. As part of the plan making process, the Council has been acutely aware of the need to deliver homes early given the housing requirement in the first five years. This has been a consideration in the site selection process. Whilst the sequential application of the spatial hierarchy has been the principal driver in relation to identifying the spatial distribution of growth, the Council has considered this in conjunction with their ability to deliver early.
- 3.29 This is mostly clearly demonstrated 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.
- 3.30 Retaining all three strategic Green Belt sites also helps contribute towards early delivery. 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.

Potential challenges to additional early delivery as a result of existing safety and congestion issues along the A3 through Guildford

- 3.31 The Government’s Road Investment Strategy: for the 2015/16 – 2019/20 Road Period (Department for Transport, March 2015) (hereafter the RIS) provides funding for developing an A3 Guildford (A320 Stoke interchange junction to A31 Hog’s Back junction) scheme. This is referenced as scheme SRN2 in the Infrastructure Schedule of the Submission Local Plan.
- 3.32 The RIS provides funding for developing the A3 Guildford RIS scheme during the period up to 2019/20 with delivery of this scheme anticipated to start in the next Road 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.

- 3.33 In its most recent consultation response in summer 2017, Highways England stated with respect to Policy S2 that:
- ‘The housing trajectory ... demonstrates that many thousands of houses are expected to be delivered after the next roads period (2020-2025). Some of these Local Plan sites may be wholly or partially reliant on a potential improvement on the A3 through Guildford. It would be helpful to understand in more detail which development sites are expected to come forward ahead of a potential scheme and which development sites may be dependent upon it.*
- Owing to the existing A3 congestion issues and the lack of certainty for any potential future scheme on the A3 through Guildford, the management and phasing of the Local Plan developments will be critical.’*
- 3.34 Similarly, with respect to Policy ID1, Highways England stated:
- ‘It is noted that the delivery of housing in the later stages of the plan period is dependent upon a major improvement to the A3 through Guildford. As set out in Policy ID1, it is essential that “the delivery of developments may need to be phased to reflect the delivery of infrastructure” and that “if the timely provision of infrastructure necessary to support new development cannot be secured, planning permission will be refused”. We consider this to be essential due to the existing congestion issues and the lack of certainty of any future scheme, as noted above.’*
- 3.35 In the early years of the new Local Plan, the delivery of planned development and the impact of new development traffic on the 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.
- 3.36 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.
- 3.37 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.



- 3.38 Appendix 1 is a reproduction of Figure A8-B from the Transport topic paper (December 2017). This shows the relationship between the phasing of developments and transport schemes.
- 3.39 Highways England has developed several targeted improvement schemes for the Guildford section of the A3, primarily to improve road safety but also providing some congestion relief. In March 2017, the Government committed funding for two of these schemes, which are included in the Submission Local Plan's Infrastructure Schedule as:
- 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'.
- 3.40 The two schemes will be delivered by spring 2020. The road safety and congestion relief provided by these schemes is relevant to the delivery of planned development that will be delivered in the first years of the new Local Plan.
- 3.41 SRN7 and SRN8 will be complemented by capacity and safety improvements on the adjacent Local Road Network, as realised by schemes LRN2 and phase 1 of SMC1 at Egerton Road and an element of LRN1 at Stoke interchange.
- 3.42 The Study of Performance of A3 Trunk Road Interchanges in Guildford Urban Area to 2024 Under Development Scenarios<sup>33</sup> (Mott MacDonald, April 2018) is an update of the December 2017 report. (2024 is the assumed earliest date for the start of construction of the A3 Guildford scheme and Highways England does not have a preferred scheme with construction methodology available for testing.) The study 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. This responds to the issues raised by Highways England in 2016. However, it should be noted that this assessment is limited to the trajectory proposed in the Submission Local Plan.
- 3.43 Whilst the conclusions of the updated report remain unchanged, the assessment does highlight the potential impact of planned development in the early years on the operation of the A3 through Guildford.
- 3.44 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. Funding of these 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.

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<sup>33</sup> GBC-LPSS-SD-040-RevB

- 3.45 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.
- 3.46 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 commencing 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.

#### Why an amended trajectory is unrealistic

- 3.47 As set out above, the reason why the annual housing target is so much lower than the actual delivery is projected to be is so that the oversupply each year (delivery over and above the 'annual housing target') can contribute towards meeting the undersupply that has been accrued since the beginning of the plan period (approximately 2 years' worth of housing or 1,300 homes). The backlog is further compounded by the requirement to build in a 20% buffer, in accordance with the NPPF given the persistent past under-delivery (approximately another 1.5 years' worth of supply or almost 1,000 homes). In total the first six years of the plan post-adoption is projected to deliver 1,600 more homes than the sum of the annual housing target for this same period.
- 3.48 The scale of this additional requirement within the first five years, combined with the time taken to begin actual delivery on sites that require the plan to be adopted first, mean the delivery rate necessary to achieve a Sedgefield approach is considered to be unrealistic and unachievable. Appendix 5 of the Housing Delivery topic paper sets out what the five year housing land supply position would be using this approach. To achieve a Sedgefield approach, the plan would need to include a further 2,100 homes, all of which would need to be delivered in the first six years post-adoption of the plan. Assuming no change in completions in Year 1 (given the reasons set out earlier), this would require completions of 1,100 homes in Year 2 and in the region of 1,300 in Years 3, 4 and 5. This step change in completions so soon after the plan is adopted is considered to be unrealistic. There is considerable doubt that all these

sites would be able to gain the necessary planning permission and begin construction on site at the rate necessary to deliver these completions.

- 3.49 We have also explored whether a Liverpool approach would be feasible (spreading the backlog over the remaining plan period) however the issues related to expected delivery on sites combined with the additional 20% buffer still mean the level of delivery required to achieve a rolling five year supply of homes is unachievable. Appendix 6 of the Housing Delivery topic paper sets out what the five year housing land supply position would be using this approach. To achieve a Liverpool approach, the plan would need to include a further 1,100 homes, all of which would need to be delivered in the first six years post-adoption of the plan. Assuming no change in completions in Year 1 (as above); this would require completions of 900 homes in Year 2 and approximately 1,000 in Years 3, 4 and 5. Whilst lower than Sedgfield it is still considered to be unrealistic for the reasons given above.
- 3.50 It is for this reason that the plan proposes a stepped housing target combined with a Liverpool approach to spreading the backlog (referred to as a Liverpool phased approach). Appendix 7 of the Housing Delivery topic paper sets out what the five year housing land supply position would be using this approach (5.41<sup>34</sup> in Year 1 and staying within this ballpark for remaining years, namely less than 6 years). This approach enables the excess supply delivered each year to gradually rectify the past underperformance whilst still planning for the 20% buffer required by the NPPF. It is important to note that planning for the 20% buffer and a proportion of the backlog does in itself bring forward a substantial five year delivery requirement which will ensure adequate choice and contribute towards meeting past undersupply.

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<sup>34</sup> This does not include the recent appeal decisions which will have helped to improve the position



## Question 4 - The spatial development strategy

*“Policy S2 is headed “Our Spatial Development Strategy”, but there is no indication of the numerical balance of housing development between different settlements. This provides no guidance to future neighbourhood plans in terms of the amount of development they are expected to accommodate. I invite the Council to produce a suggested modification to Policy S2, or a new policy, setting out how much housing development is expected in the different settlements.”*

### Introduction

- 4.1 This paper suggests a draft modification to Policy S2, setting out how much housing development is anticipated in different settlements or spatial locations in the borough as well as reflecting the sources of housing supply over the plan period.
- 4.2 The Plan makes provision for all the borough’s housing needs. A variety of sources of housing supply forms the basis for delivery over the plan period. This includes by means of proposed allocations and other sites identified in the Land Availability Assessment (not allocated), which are geographically specific in the context of the plan and other forms of supply (e.g. in the form of windfall sites and rural exception homes) which are not site specific and are trend based.
- 4.3 Consequently, there is no reliance on future neighbourhood planning processes to settle the location or quantum of future housing development as the plan identifies sufficient sites to meet the total requirement.
- 4.4 As a result, the draft modification does not seek to impose requirements on neighbourhood plans, but rather aims to:
  - clarify the overall housing figures upon which plan supply is based;
  - clarify the proposed distribution of housing development within the borough as made provision for in the Plan;
  - make explicit the link between this distribution and the spatial strategy articulated in the Plan, which reflects the most sustainable locations for growth.

### Outline of draft proposed modification to Policy S2

- 4.5 The draft proposed modification is reflected in Question 4 Appendix. It includes:
  - a new table and associated text indicating the sources of housing supply<sup>35</sup> during the plan period.
  - a new table and associated text reflecting the distribution of housing in relation to the spatial locations articulated in the “Introduction” section of Policy S2.
- 4.6 This is proposed to be included in the “Introduction” section of the policy as it provides clarity and is descriptive rather than guiding development management

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<sup>35</sup> The housing figures provided in the proposed modification are as per the Submission Local Plan: Strategy and Sites (December 2017).

decision-making or setting the quantum of development that neighbourhood plans are expected to accommodate.

- 4.7 Further to this, the draft proposed modification includes a cross reference within the Policy to these new tables by means of addition of text to Policy S2(1)<sup>36</sup>. This is intended to make the link between housing delivery and the Plan's spatial strategy more explicit.

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<sup>36</sup> Please see answer to *Question 3: The housing trajectory* for further changes to Policy S2.

## Question 4 – Appendix 1: Draft proposed modification to Policy S2: Planning for the borough – our spatial strategy

4.8 Add the following text under Policy S2:

(1) During the plan period (2015-34), we will make provision for: at least 12,426 new homes as per the total target (requirement) in Table S2a and distributed across the spatial locations identified in Table S2b; 36,100 – 43,700 sq m of office and research and development (B1a and b) floorspace; 3.7– 4.1 hectares of industrial (B1c, B2 and B8) land; and, 41,000 sq m of comparison retail floorspace.

4.9 Add the following after 4.1.9:

4.1.9aa Our total housing supply over the plan period (2015-2034) is indicated in the table below and will comprise homes from a variety of sources in addition to the Local Plan’s site allocations.

4.10 Table S2a: Sources of supply: 2015 - 2034 (net number of homes)

|   |                     |
|---|---------------------|
| Total target (requirement)              | 12,426              |
| Commitments (permissions / completions) | 2,586 (1,747 / 839) |
| Site allocations                        | Approx. 9,907*      |
| LAA sites not allocated                 | 858                 |
| Windfall                                | 750                 |
| Rural exception                         | 90                  |
| Total supply over the plan period       | 14,191              |

\*This excludes current permissions / completions as part of these allocations

4.1.9ab Informed by our spatial development strategy, the anticipated distribution of housing as identified in the plan’s site allocations<sup>37</sup> (and LAA sites not allocated) is reflected in the table below.

4.11 Table S2b: Spatial Strategy: Distribution of Housing 2015 – 2034 (net number of homes)

| <b><u>Spatial locations / settlements</u></b>   | <b>Homes</b> (Site allocations + LAA sites not allocated, excluding permissions and completions) |
|---|--|
| <b>Guildford town centre</b>                    | <b>1,221</b>   |
| <b>Urban areas</b>                              | <b>1,453</b>   |
| Guildford (incl. SARP)                          | 1,399  |
| Ash and Tongham                                 | 54   |
| <b>Inset villages</b>                           | <b>272</b>   |
| <b>Within Identified Green Belt Villages</b>    | <b>154</b>   |
| <b>Previously Developed Land in Green Belt)</b> | <b>395</b>   |
| <b>Countryside beyond the Green Belt:</b>       | <b>1,125</b>   |

<sup>37</sup> For more detail on the site allocations, see the summary table in the site allocations policy of the Local Plan.

|   |                |
|---|----------------|
| Extension to Ash and Tongham                  |                |
| <b>Urban extensions to Guildford</b>          | <b>3,350</b>   |
| Gosden Hill Farm                              | 1,700          |
| Blackwell Farm                                | 1,500          |
| Land north of Keens Lane                      | 150            |
| <b>New settlement: Former Wisley Airfield</b> | <b>2,000</b>   |
| <b>Development around villages</b>            | <b>795</b>     |
| <b>Total</b>                                  | <b>10,765*</b> |

\*This total excludes trend based housing supply (Windfall and rural exception) as well as completions and permissions, whether allocations or not.



## Question 5 - The balance of land uses: encouraging more housing development on brownfield and central area sites

*Guildford is a location with conflicting demand for limited space from different land uses, but it is demonstrably clear that the major need is for new housing, so it is not apparent why the plan seeks to protect all employment land, floorspace and hotels. Should the plan not be encouraging housing to replace outdated hard-to-let commercial premises in Guildford town centre, and should the land use balance in the Employment Core policy be revisited? This is a key strategic issue given (a) the amount of Green Belt land that is proposed to be released; (b) the potential that a higher OAN will be identified and (c) the need to cater for unmet housing need in the HMA. Please can the Council produce a paper setting out what steps should be taken and policy revisions made to accommodate a greater amount of the housing growth in the town centre and on other eligible brownfield land including suitable employment land and hotels.*

### Summary

- Whilst the Council accepts that “the major need is for new housing”, appropriate regard has to be had to meeting other needs, including the requirement for additional employment land as identified in the Employment Land Needs Assessment “ELNA”<sup>38</sup>.
- No change is proposed on the identified Strategic Employment sites and Locally significant Employment sites as policies provide a mechanism to enable hard to let premises to be changed to residential use after a period of active monitoring.
- The Council suggest that non designated sites can be replaced with housing uses following appropriate marketing.
- The Council also accepts that the issue in terms of Guildford town centre is a matter of balance and has revisited the policies protecting existing employment land and suggested appropriate modifications to the current policy.
- Residential development in the town centre should usually be in addition to and not instead of high trip generating uses like offices and retail.
- Hotels also need to be protected by policy to support the rural economy and support the leisure and business economy of the borough.

### Introduction

- 5.1 This paper includes an analysis of the:
- Approach to meeting employment needs
  - Consequences of not protecting the Guildford Town Centre employment core
  - Consequences of not protecting hotels
  - Impact on meeting OAN

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<sup>38</sup> SD007

## Approach to meeting employment needs

- 5.2 The employment need for Guildford borough is identified in the ELNA, which was updated in 2017. This update incorporated the latest post-Brexit employment forecasts which resulted in a reduced employment need from that previously assessed in the ELNA 2015. The Submission Local Plan only seeks to meet the employment need as identified in the 2017 update.
- 5.3 The reason for doing so is twofold. The first is that the objectively assessed housing need (OAN) for Guildford, which the plan is seeking to meet, is consistent with the employment need and is influenced by it - as the various emanations of the SHMA make clear. To plan for a lower level of economic growth would be unsustainable as it would lead to an imbalance between the number of jobs and the workers available to fill these jobs. As set out in the NPPG this could result in unsustainable commuting patterns<sup>39</sup>.
- 5.4 The second reason relates to the constrained nature of the borough which impacts upon the availability of suitable sites. It is agreed that to plan for a greater level of development would be unsustainable and so the plan therefore builds on Guildford's existing strengths with a focus on research, development and design activities, and the provision of valuable knowledge-based employment. This is consistent with the aspirations of the Enterprise M3 Local Enterprise Partnership (LEP) and the growth of the Sci-Tech Corridor<sup>40</sup>, which identifies Guildford as a growth town.
- 5.5 In spite of a reduction in the employment need, this forecast level of growth still cannot be met solely on existing employment sites. Given the constraints in identifying new suitable sites and a general lack of availability of potentially suitable sites for employment uses and the impact of permitted development changes authorising change of use to C3, the Council has sought, in the first instance, to protect existing employment sites in order to reduce the amount of new employment land that would be necessary to meet the full need over the plan period and then to provide appropriate new allocations.
- 5.6 Policy E1 both makes provision for new applications and establishes the following hierarchy based on the size of the (existing or proposed) employment site and the amount of employment floorspace:
- Strategic Employment Sites (SES)
  - Locally Significant Employment Sites (LSES)
- 5.7 Policy E3 seeks to protect these sites in accordance with the hierarchy. The extent of marketing evidence that is required to justify the loss of an employment site is set on a sliding scale. The Submission Local Plan sets this at two years for SES, 18 months for LSES and 12 months for all remaining non-designated employment sites. This reflects their relative significance and importance that is consistent with the NPPF which states that applications involving a change of use from commercial to residential should be approved "provided that there are not strong economic reasons why such development would be inappropriate"<sup>41</sup>. The approach in the Submission Local Plan, recognises the need to retain existing employment sites, whilst providing the mechanism for any out-dated and hard to let commercial premises to be reallocated or redeveloped for housing, particularly as these sorts of sites are unlikely

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<sup>39</sup> NPPG, Paragraph: 018 Reference ID: 2a-018-20140306

<sup>40</sup> Strategic Economic Plan (2014) available online at [www.enterprisem3.org.uk/strategic-economic-plan](http://www.enterprisem3.org.uk/strategic-economic-plan)

<sup>41</sup> NPPF, paragraph 51

to have been identified as key to meeting the employment strategy (designated as SES/LSES) and so are subject to a lesser marketing test.

- 5.8 However should this approach still be considered too restrictive, the Council puts forward the following potential modifications to Policy E3, which would serve to enable a greater potential for new housing on brownfield sites:
- E3(3) – amend to be more positively worded to explicitly encourage housing development on sites which have been subject to the defined period of active marketing. Note the minor modification submitted with the plan already clarifies that marketing would not be required on those sites which have been allocated for a different use within the Local Plan.
  - E3(4) – amend so that this requirement is only applicable to SES and LSES. This would enable any suitable non-designated employment sites that have been subject to the defined 12-month period of active marketing to be replaced by housing without first having to explore the potential of the site to accommodate another B class or employment generating use.
- 5.9 ~~(3)~~ (4) Outside of the designated employment sites, employment floorspace will be protected in line with the latest needs assessment and the loss will be resisted unless the site is allocated for an alternative use within the Local Plan. Redevelopment or change of use to ~~a non-employment use will only be acceptable~~ housing use will be acceptable if evidence is provided of active and comprehensive marketing of the site for its current use for a continuous period of at least 12 months prior to submission of a planning application. If the site is allocated for an alternative use within the Local Plan, the marketing period will not be required.
- ~~(4)~~ (3) On Strategic and Locally Significant Employment Sites, once the period of the comprehensive and active marketing should also include consideration of is complete, another alternative suitable B class employment use ~~should be considered, followed by any and~~ other employment generating use, before change of use to residential of other use with no on-going employment use will be permitted.

#### Consequences of not protecting the Guildford Town Centre employment core

- 5.10 The town centre employment core is a SES (primarily consisting of B1a). This is suitably located for high trip generating, sequentially preferable town centre employment uses. This is consistent with the NPPF, which requires that main town centre uses are directed to existing town centres in the first instance (paragraphs 23, bullet points 1, 6 and 7 in particular, and 24). This approach helps to retain the economic viability and vibrancy of Guildford town centre.
- 5.11 Policy E3 guards against the loss of current floorspace. It does not preclude the intensification of this area should some mixed use higher density schemes be progressed which could provide additional housing in this sustainable location. The Council considers the approach of resisting the loss of current floorspace is justified as, if floorspace is lost here, it would need to be re-provided elsewhere if needs are to be met. This would be in a less sustainable location (outside town centre), not well served by public transport, which would increase trip generation, and likely be on Green Belt land on the edge of the urban area. This is contrary to national policy of directing main town centre uses to sequentially preferable locations.
- 5.12 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 use 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 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.

#### Consequences of not protecting hotels

- 5.13 Reference is also made to the potential for existing hotel sites to be utilised to deliver additional housing growth. Policy E6 seeks to protect against the loss of hotels given their generally lower land value and the need for such uses to support the wider economy as well as the leisure and visitor economy. Hotels are considered a main town centre use and, as above, should be directed to sequentially preferable locations. Given the scarcity of suitable and available potential hotel sites in the town centre and the need identified in the Surrey Hotel Futures Report (2015) – which is reinforced by interest from operators demonstrated in approaches to the Council's Economic Development Team, it is considered necessary to both protect existing sites where possible whilst also promoting the provision of new facilities.
- 5.14 The Submission Local Plan acknowledges that the market and locational requirements of some main town centre uses may only be accommodated in specific locations. This includes visitor accommodation in the rural areas. Protecting existing hotels is considered to be justified given their role in supporting the rural economy and promoting tourism. It is considered that the criteria set out in Policy E6(3) provides an appropriate mechanism for any existing hotels that are no longer needed or unviable to be lost for housing.

#### Impact on meeting OAN

- 5.15 The Council notes that this key strategic issue of whether best use is being made of the town centre or whether additional housing could be directed here is raised in light of:
- (a) the amount of Green Belt land that is proposed to be released;
  - (b) the potential that a higher OAN will be identified and
  - (c) the need to cater for unmet housing need in the HMA.
- 5.16 In relation to (a), the Council does not consider that additional capacity in the town centre would enable a commensurate reduction in the amount of Green Belt land that is proposed to be released. The three strategic Green Belt sites are necessary for early delivery and meeting the overall housing requirement across the plan period. The smaller Green Belt sites are all necessary for the valuable contribution they make towards early delivery in the first five years. Given the stepped trajectory (see question 3), the Council do not consider it would be justified to remove any of these sustainable sites. The removal of the employment core, or part of it, would therefore not act as a replacement for the Green Belt sites currently proposed. It is also worth noting that the majority of sites discounted within the area as part of the Land Availability Assessment process were discounted due issues such as high flood risk or viability/deliverability concerns. It is therefore not considered that the de-

designation of this land (or significant relaxation of policy protection) would remove the need to release Green Belt land.

- 5.17 In relation to points (b) and (c), notwithstanding the above, if land within this area were to become developed for housing this would likely be delivered later in the plan period. This is due to factors inherent with bringing forward brownfield sites and includes issues such as availability of the site given current leases or the need to relocate current uses, the potential need for land assembly and overcoming constraints such as flooding. There is already flexibility of delivery within this period so any additional housing would not in reality contribute towards either a higher OAN or cater for any potential unmet needs as both of these scenarios would require housing to be delivered earlier in the plan period.

## Question 6 - North Street site

*How many years has the redevelopment in North Street, Guildford, been under consideration, how long has it had planning permission and has that permission been renewed?*

*Against a background of changing retail patterns with continued strong growth in Internet retailing, what consideration has the Council given to re-evaluating the balance of uses in this location having regard to the need to accommodate additional homes?*

### Summary

- In response to the Inspector's queries, this paper outlines the recent planning history of North Street from the application approved in 1998.
- The Council highlight the support provided by the current site promoters for a mixed use retail led scheme
- Consistent with national policy, the Local Plan seeks to meet retail needs in full, with a preference for town centre sites. The quantum of residential development proposed at North Street has been increased from that originally proposed but not at the expense of meeting identified retail needs.
- The Council consider the balance of uses on the North Street site appropriately reflects retail needs as well as residential needs and the scarcity of sequentially preferable sites in town centres.
- Concerns expressed over the need for greater flexibility and continuing changing patterns of retailing are acknowledged. The Council suggest amendments to the Policy in order to provide flexibility in relation to meeting changes to the evidence base.

### The recent planning history of North Street

6.1 In 1998, an application was approved for a mixed use scheme (95/P/01539). A further planning application for redevelopment of this site was submitted to the Council in June 2000 (00/P/01224) but was later withdrawn by the applicant. In 2004, an outline application for a mixed-use redevelopment was approved by the Council (04/P/00090), with the reserved matters approved in March 2006. This scheme comprised 24,923 sq m floorspace for A1 retail units, professional and financial (A2) uses, restaurants and cafes (A3), up to a maximum of 170 residential units, 922 sq m of community space (D1), a replacement bus station, public square, residential car parking, refurbishment of the Friary Centre and other ancillary works. The permission was extended in October 2010 (09/P/02043) but it expired in 2015 and the Council has not received a new application to replace it since then.

6.2 In July 2015, the Council took the decision to terminate the development agreement with Land Securities, the agent for the site at that time<sup>42</sup>. This was because it had not been possible to agree financial terms with them by the agreed date of December

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<sup>42</sup> See minutes of the Executive meeting held on 21 July 2015:  
<http://www2.guildford.gov.uk/councilmeetings/ieListDocuments.aspx?CId=132&MId=165&Ver=4>

2014 that would have provided the Council with a minimum financial ground rent equivalent to the income that it already received from the site and result in best value for the tax payer. This decision also enabled the Council to consider other redevelopment options as part of the wider draft Local Plan strategy, including reviewing the balance of uses to test if there might be a more appropriate mix and entering into discussions with other prospective development partners.

### Current Proposals for North Street

- 6.3 A Lock Out Agreement was entered into between Guildford Borough Council (GBC) and Carraway Guildford Limited Partnership (the developer, part of M&G Real Estate<sup>43</sup>) in December 2016, to progress delivery of a replacement scheme. The developer is currently actively working on pre-planning analysis of development options in consultation with GBC as joint landowner. Following this stage of analysis, the developer anticipates engaging in pre-application discussions with GBC as planning authority prior to submitting a planning application.
- 6.4 The site is complicated to develop due to multiple leasehold ownerships and the fact that comprehensive redevelopment in line with the proposed site allocation A6 would require relocation and/or reconfiguration of the bus interchange and mitigation to accommodate the increased traffic demands arising from redevelopment. The site is also partially within flood zones 2 and 3 and adjacent to a conservation area, and any redevelopment will need to be integrated with the existing Friary Shopping Centre. These constraints will need to be resolved at the application (and pre-application) stage. However, due to Guildford's strong retail market and, based on the Council's discussions with the current developer, it is anticipated that a replacement scheme will be implemented in years 6-10 of the Plan period (from approximately 2024).
- 6.5 Based on discussions with its commercial property advisors, Lambert Smith Hampton, as well as local retailers and other stakeholders, the Council considers the proposed mixed-use site allocation A6 in the Submission Local Plan to be commercially viable, and capable of attracting an anchor retail tenant of a quality that will attract other retailers to the town centre.
- 6.6 The representations received by the site promoters, M&G Real Estate<sup>44</sup>, support retail led mixed-use redevelopment of the site. They also supported the increases to the residential and food and drink allocations in the 2017 version of the Submission Local Plan, which have enabled the overall allocation for comparison retail uses to be lowered to match the latest floorspace capacity forecast in the 2017 Retail and Leisure Study Addendum.
- 6.7 The Council intend to propose further modifications to the wording of policy A6 (as shown at the bottom of this response), which will respond to points made in M&G's

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<sup>43</sup> M&G is the other key landowner (leaseholder, and freehold owner of the adjacent Friary Centre) and owns a significant land interest in the North Street site.

<sup>44</sup> See response to representations on the Submission Local Plan 2017, Comment ID pslp172/2648, submitted by Terence O'Rourke Ltd for M&G Real Estate, dated 22 July 2017: <https://getinvolved.guildford.gov.uk/consult.ti/pslp17/consultationHome>

representation about the need for flexibility to accommodate economic changes not anticipated in the plan, as advised in paragraph 21 of the National Planning Policy Framework (NPPF).

Whether the balance of land uses on site allocation A6: North Street should be amended to respond to changing retailing patterns

- 6.8 The 2017 Retail and Leisure Study Addendum (RLSA) took account of changing retail patterns, including the increase in Internet trading (see Appendix 10). It notes that in spite of the 16.2% increase in Internet sales since 2015, many of the multiple and traditional high street retailers in Guildford are actively seeking larger format bricks and mortar retail units to showcase their product range. Guildford town centre stands out as a highly successful retail centre and was ranked 11 in the top 500 British retail centres for vitality in 2014 and second among the top 5 centres in the South East, after the Bluewater centre in Stone, Kent<sup>45</sup>.
- 6.9 The NPPF (paragraph 23) advises local authorities that town centres should be ‘*at the heart of their communities*’ and states that they should ‘*pursue policies to support their viability and vitality*’, whilst at the same time recognising ‘*that residential development can play an important role in ensuring the vitality of centres*’. The Council doubled the residential allocation on the North Street site from 200 to 400 homes between the 2016 and 2017 versions of the Submission Local Plan. At the same time, the Council doubled the food and drink allocation (A3 and A4 uses) from 3,000 to 6,000 sq m. These adjustments enabled the overall allocation for comparison retail uses to be lowered from 45,000 to 41,000 sq m to match the latest floorspace capacity forecasts<sup>46</sup>. The current wording of the allocation does make it clear however that the priority on the site is to ensure to meet the currently identified retail needs (given its location in the town centre) over the housing need if capacity on the site is constrained.
- 6.10 The purpose of prioritising retail on this site was to be in accordance with the NPPF, specifically responding to the policy requirement to meet the scale and type of retail needed in town centres *in full* (paragraph 23, bullet 6). This area of Guildford has considerable potential for retail expansion and the site in North Street is of vital importance for meeting the borough’s OAN for retail floorspace to 2034. New retail floorspace in this area, alongside regeneration of the existing shopping areas, the provision of new public open space and improved connectivity (to be delivered through comprehensive redevelopment schemes such as North Street), has the potential to attract many more visitors and shoppers to the town centre. Therefore, although it is appropriate to include some residential development on the site, we feel that the retail, food, drink and leisure uses proposed in Policies E7 and A6 should not be diluted further by additional residential or other uses.
- 6.11 The Council firmly considers that the Local Plan strikes the appropriate balance between retail, leisure and residential uses at North Street. To tilt the balance more

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<sup>45</sup> Source: <http://www.costar.co.uk/en/assets/news/2014/October/The-UKs-most-and-least-vital-retail-centres/>

<sup>46</sup> in the Guildford Retail and Leisure Study Addendum 2017



towards additional residential uses would further reduce the availability of space on the site for vital new retail development, which in turn could harm the town centre's retail competitiveness and vitality.

- 6.12 The town centre and other highly accessible sites offer increased options for the use of public transport. These sites are relatively rare so should be used for high trip generating uses such as employment and retail to maximise their use. This enables not only transport choice but also linked trips, which reduce the need to travel. Mixed-use retail led developments that include a modest residential element can help maximise the development opportunities on a site, whilst providing accessible residential units which help support the vitality and viability of town centres, provide natural surveillance and support the night-time economy. This approach is consistent with emerging Government policy in relation to increasing the density in town centres<sup>47</sup>.
- 6.13 The following tables show the floorspace capacity for comparison retail floorspace across Guildford borough and town centre over the period covered by the 2017 Submission Local Plan:

**Borough-wide assessed floorspace capacity<sup>48</sup> for comparison goods**

|                               | 2020  | 2025   | 2030   | 2034   | 2036   |
|-------------------------------|-------|--------|--------|--------|--------|
| Net capacity (sq m)           | 1,130 | 10,965 | 28,202 | 32,665 | 37,595 |
| Assumed gross capacity (sq m) | 1,614 | 15,664 | 40,289 | 46,664 | 53,707 |

Source: Guildford Retail and Leisure Study Addendum 2017, Appendix 9, Table 1

Note: The gross floorspace capacity assumes a 70% net/gross floorspace ratio

**Guildford Town Centre assessed floorspace capacity<sup>49</sup> for comparison goods**

|                               | 2020  | 2025   | 2030   | 2034   | 2036   |
|-------------------------------|-------|--------|--------|--------|--------|
| Net capacity (sq m)           | 3,313 | 11,812 | 26,699 | 30,551 | 34,811 |
| Assumed gross capacity (sq m) | 4,733 | 16,875 | 38,142 | 43,645 | 69,730 |

Source: Guildford Retail and Leisure Study Addendum 2017, Appendix 7, Table 1

Note: The gross floorspace capacity assumes a 70% net/gross floorspace ratio

- 6.14 The retail capacity forecasts from the 2017 RLSA in the tables above indicate that the adjusted allocation in the 2017 Submission Local Plan of 41,000 sq m comparison retail floorspace, added to the 2,000 sq m allocated on other sites, falls below the total forecast borough-wide capacity to 2034 of 46,664 sq m. For the town centre, the total allocated comparison floorspace is 41,500 sq m, which is below the 43,645 sq m forecast capacity. Based on these figures, there will be a slight overall shortfall in provision of comparison retail floorspace to 2034 of approximately 3,600 sq m across the borough, and a slight shortfall of 2,100 sq. m in the town centre. These figures provide further indication that, given the importance of the North Street site for accommodating the retail development needed in the town centre over the

<sup>47</sup> See paragraphs 122-123 of the Draft National Planning Policy Framework (CLG, March 2018)

<sup>48</sup> Note that capacity also refers to need in this context

<sup>49</sup> Note that capacity also refers to need in this context

Plan period, it would be inappropriate to reduce the amount of retail allocated on this site.

#### Proposed amendment to Policy

- 6.15 The 2017 RLSA forecasts the need for retail and leisure uses for the entire Plan period from 2015-2034, however they recognise that this is a 19-year period and that forecast needs may change in that time. Indeed the 2017 RLSA provides a caveat at paragraph 1.5 to state that forecasts carried out over a long period are inherently uncertain due to the impact of economic, demographic and market trends. The retail allocation for policy A6 deliberately took account of this by proposing a lower gross retail figure which falls below the 2034 capacity figure in the first table above. Paragraph 86(d) of the draft text of the updated National Planning Policy Framework (NPPF) further supports this approach with its reference to the need to plan at least ten years ahead to meet the need for retail uses in town centres.
- 6.16 We therefore propose to introduce a caveat by way of a recommended modification to Policies E7 and A6 of the Submission Local Plan to state that if updated retail forecasts supersede the forecasts in the 2017 RLSA, then we would adjust the balance of allocated uses accordingly. Our proposed modified wording is as follows:

#### Draft proposed modification to Policy A6:

- 6.17 The Council proposes to amend the wording of policy A6 as below (text that is red and underlined is proposed to be added to the policy; text that is red and struck through is to be deleted):

#### **Allocation**

The site is allocated for a comprehensive mixed use redevelopment with an additional:

- (1) ~~Minimum of~~ Approximately 41,000 sq m (gross) comparison retail floorspace or a figure that is consistent with subsequent updates to the Guildford Retail and Leisure studies
- (2) Approximately 6,000 sq m food and drink (A3) and drinking establishments (A4)
- (3) ~~Up to~~ Approximately 400 homes (C3)
- (4) Provision of 1 gym (D2)

#### **Key considerations**

If the forecast requirements for retail and leisure uses in the latest Retail and Leisure Study are updated in future either by the Council or by a study commissioned by the Council then the balance of allocated uses for this site will be adjusted accordingly in the next review of the Local Plan.

Draft Proposed Modification to Policy E7

- (1) By 2034 Guildford town centre will have:
  - (a) A new retail-led mixed-use development of approximately 41,000 sq m (gross) of additional comparison retail floorspace or a figure that is consistent with subsequent updates to the Guildford Retail and Leisure studies on the North Street regeneration site within its primary shopping area.

## Q7. The approach to student housing

*Given the serious need for additional housing and the effect of student growth on the housing market, is the plan too unambitious in its expectations of the amount and proportion of students that should be accommodated on or close to the University campus? Should the plan be firmer in requiring additional purpose built student housing to accompany proposals for further higher education?*

### Summary

- 7.1 The Council acknowledges both the serious need for additional housing and the effect of student growth on the housing market.
- 7.2 Given the very high proportion of students currently provided for on campus (top 5% of all universities in the country) and the reality that a significant proportion of students will, whatever level of on-Campus accommodation is available, continue to seek market accommodation, the Council considers that the plan is suitably ambitious. Although it is unreasonable to require accommodation that would not be used, the Council has, given the level of housing need, considered it appropriate to retain the target of about 60% of full time Guildford based University of Surrey (UniS) students being provided with accommodation on campus, despite University opposition.
- 7.3 The Council has actively sought to ensure that the appropriate combination of student housing supply is provided for over the plan period in order to meet need. It has done so through:
- close engagement with the UniS 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, extant planning permissions (which are being implemented) and associated build out rates, which in turn are informed by the need for the University to ensure viability and avoid any increase in vacancy 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 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.
- 7.4 The Council thus considers that student accommodation needs have been suitably addressed and that it has been appropriately ambitious in its expectations of the amount and proportion of students that should be accommodated on or close to the University campus.

### Efforts to address the need for student accommodation

- 7.5 In response to the first part of the Inspector's question, the following sections provide further detail on how the Council has considered and addressed the future need for

student accommodation arising from potential growth in Full Time Equivalent (FTE<sup>50</sup>) Guildford based students.

- 7.6 This is presented in the context of an understanding of the scope and scale of student establishments offering higher education courses within Guildford, along with the accommodation they provide. Detail in this regard, along with Council's approach to student accommodation, is set out in the [Housing type, tenure and mix Topic Paper](#)<sup>51</sup>.

#### SHMA & uplift

- 7.7 The Council required the SHMA to consider the impact of student growth on the housing market. As a result, the Council have included an uplift to our housing OAN, recognising that meeting student accommodation needs is fundamental. This is addressed in the [Strategic Housing Market Assessment](#) (SHMA) addendum (see paragraphs 7.12-7.14). On the basis that 55% of full time Guildford-based University students will live within halls of residence<sup>52</sup>, the uplift (translating into 23 homes per annum over the plan period) is intended to cater for the remaining 45% students that could be expected to live within the general housing stock and this figure takes account of the University's relatively aspirational growth expectations.

#### Allocating sites

- 7.8 To help address future demand for housing from students the Council have, alongside increasing our housing target, allocated sites for student accommodation in the Local Plan including near the UniS campus. Both the Council and the University recognise the need for sufficient student accommodation to ease the pressure on market housing stock. Sites allocated to help accommodate possible future student accommodation need include on Gill Avenue adjacent to Manor Park campus (unspecified bedspaces), Guildford College<sup>53</sup> (approximately 200 bedspaces) and the University of Law campus (approximately 112 bedspaces).

#### Benchmarking current UniS PBSA provision, Manor Park & our expectations

- 7.9 The University has invested<sup>54</sup> significantly in providing student accommodation and the current percentage of students living on campus is very high compared to other

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<sup>50</sup> FTE is calculated using the enrolment status, mode of attendance, and expected teaching time of a course for students.

<sup>51</sup> See paragraphs 4.31-4.42.

<sup>52</sup> This reflects an acknowledgement of the University's aim to provide accommodation for 50-60% of these students.

<sup>53</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>54</sup> The University's response to the recent 2017 public Draft Local Plan consultation highlights it has invested nearly £130m in student accommodation in the last 10 years and it plans to deliver 1,150 new units over the next three years (costing approximately £75 m) and that it expects to deliver more in the future as funds/circumstances permit to support new demand.

university establishments, with it providing more accommodation than 95% of Universities across the nation.

- 7.10 Furthermore, the Council highlights the significance of the extant planning permission at UniS Manor Park campus<sup>55</sup> and its capacity to deliver student accommodation. In the 2003 Local Plan a site known as Manor Park was removed from the Green Belt to meet the anticipated growth of the UniS. This was on the understanding that there was a need to increase student residential accommodation, with the aim of returning the proportion to about 60% (Inspectors Report September 2001 paragraph 16.2.4<sup>56</sup>). This figure of 'about 60%' was again quoted in the Manor Park UniS Development Brief 2003<sup>57</sup>. The outline planning approval<sup>58</sup> has a condition stating that the proposal shall be developed in accordance with the approved master plan.
- 7.11 The Manor Park Masterplan 2004 shows a capacity for approximately 4,171 bedspaces, although the final number may vary within the permitted residential floorspace of 145,200 sq m and other parameters. This accommodation is being built in a phased approach and has delivered 1,871 bedspaces to date, with another 1,151 bedspaces under construction in 2016/17. It is understood that 83,804 square metres of accommodation has been built or is under construction. The UniS has shown, through its actions and investment, its commitment to providing student accommodation on campus. According to most recent figures from the University of Surrey, it provides approximately 6251 bedspaces across all UniS campuses at present.

#### The appropriate amount and proportion of UniS campus accommodation

- 7.12 We recognise that the proportion of students requiring accommodation locally varies year on year. Many students will not require accommodation as they may be on distance learning courses, year-out placements, be part-time students, already living locally or in the family home or otherwise not requiring accommodation.
- 7.13 In the West Surrey SHMA 2015 (page 196) the University anticipated that broadly 80% of FTE students required accommodation in the locality. In the SHMA Addendum 10,700 full-time students based in Guildford of the 14,005 FTEs (or 70% of total student headcount) are indicated as requiring accommodation in the Borough.

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<sup>55</sup> Outline planning permission at Manor Park campus is for up to 145,200 sq m of residential accommodation.

<sup>56</sup> The [Local Plan Inspectors report](#) (Sept 2001) states in para 16.2.4: 'There will be similar needs to increase student residential accommodation, with the aim of returning the proportion resident to about 60%, and providing for academic staff, particularly at the more junior levels.'

<sup>57</sup> The subsequent Manor Park UniS Development Brief 2003 prepared jointly by GBC and UniS para 5.2 states: 'The University wishes to grow from current levels of about 9,000 full time equivalent (FTE) students to accommodate about 12,500 FTE, of whom it is planned that about 60% will be resident on campus.' [Outline planning permission with UniS Masterplan 2004 attached on page 15](#)

<sup>58</sup> Condition 34 of 02/P/02505 states: 'Prior to the development a Master Plan within the framework of the adopted Development Plan showing broad land use zones, indicative heights and massing of buildings, strategic landscaping proposals, network of roads, footpaths and cycle ways, building design principles and development phasing shall be submitted to and approved in writing by the Local Planning Authority. The proposal shall be developed in accordance with the approved master plan.'

- 7.14 Further to this, the UniS have stated that the demand for campus accommodation is between 50-55% of FTE students. In their comment on the Local Plan in 2014, they also state that providing accommodation of over the 50 to 60% rate will see on campus accommodation suffering increased vacancy rates. This is due to the large part of the student body that would always find living in shared houses in established residential areas attractive, irrespective of the number of rooms available on campus. This concern was reinforced by the University in their 2016 comment on the Local Plan where they objected strongly to the requirement that 60% of FTE students be accommodated on campus.
- 7.15 We have considered these representations carefully and are of the view that retaining an expectation of about 60% of Guildford based University students being provided with accommodation on campus, whilst ambitious, is reasonable, justified and robust. This has taken into account both historical evidence and more recent feedback from the UniS.
- 7.16 To set a higher percentage threshold is considered to be unrealistic and potentially unviable. There is, however, no policy wording placing a ceiling limit on 60% provision on campus and should circumstances change significantly, the plan offers the flexibility to allow for adjusted provision in this regard.
- 7.17 For aspirational future growth, the UniS anticipate that the number of students requiring accommodation locally is anticipated to fall below 80% of FTE numbers. This is as the increase in total student numbers is likely to be achieved through changing the university's recruitment patterns in terms of different modes of delivery<sup>59</sup>.
- 7.18 As a result, there is uncertainty over the long-term (later in the plan period) in terms of likely actual FTE student numbers. These trends (in terms of provision of student bed spaces meeting need as set out in the SHMA) will be monitored and will provide important evidence on the review of the Local Plan after 5 years.
- 7.19 Nevertheless, based on the likely limited growth in FTE students in the period to 2021, and the build out of the extant planning permission, we expect the percentage of Guildford based students accommodated on Campus to improve, trending toward (or in line with) our expectation.

#### Further considerations informing our position on the expectation of student accommodation on campus

- 7.20 Students have a variety of different accommodation needs and have a free choice over where they live. Just because accommodation is available on campus does not necessarily mean it will be fully occupied and students cannot be compelled to live on campus. Some students seek different accommodation based on factors such as

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<sup>59</sup> i.e. modes not adopting traditional forms of teaching in University, which involves lectures to large groups of students and tutorials, workshops and some independent study.

price, location, proximity to facilities, freedom to choose housemates, family commitments and lifestyle choice.

- 7.21 In this light, the Council recognises that windfall sites may also come forward during the plan period and makes allowance for this under paragraph 4.2.18 of the Local Plan<sup>60</sup>. The market is seeking to provide PBSA within Guildford and some schemes are in the pipeline, in addition to sites allocated in the Local Plan for student housing. Together, this will help to meet the demand for various types of student accommodation from Guildford-based students. Importantly and in recognition of the imperative of meeting the range of housing need as per the SHMA, the Local Plan seeks to resist PBSA on sites allocated for (C2 or) C3 use class housing<sup>61</sup>.

#### Being firmer in requiring additional PBSA to accompany proposals for further higher education

- 7.22 In response to the second part of the Inspector's question, the Council has considered being firmer in requiring additional purpose built student housing to accompany proposals for further higher education. In earlier iterations of the Homes for All policy wording (June 2014)<sup>62</sup> the Council proposed stronger wording with higher expectations on the provision of student accommodation. As noted, this approach met with objections from the University<sup>63</sup>.
- 7.23 After considering this option, the Council concluded that requiring additional purpose built student housing to accompany proposals for further higher education is not justified as it is not required to meet needs and would place an unjustifiable burden on education institutions.
- 7.24 Furthermore, if we were to require PBSA to accompany all new further higher education development, there would be less flexibility to reflect the actual demand. It may also discourage academic facilities from growing (in terms of the investment needed) and in turn have a negative effect on the academic opportunities available within Guildford. By actively requiring additional PBSA there is also the potential to lose sites that may be more appropriate for C3 use class housing.

#### Conclusion

- 7.25 In summary, the Council consider that it has taken an ambitious, yet balanced approach towards the provision of a variety of types of student accommodation, recognising that one size does not fit all and that students have a free choice over

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<sup>60</sup> recognises that windfall sites in sustainable locations close to higher education establishments may be suitable for PBSA.

<sup>61</sup> See 4.2.18 of the Plan.

<sup>62</sup> Previous policy wording from Draft Local Plan June 2014: 'We will expect a minimum of 60 per cent of the University of Surrey eligible student population (full time equivalent) to be provided with student accommodation on their campus or on university owned land. Should other higher educational establishment expand through new development of academic floor space they will be expected to make student accommodation provision of up to 30 per cent of their increased eligible student population (full time equivalent).'

<sup>63</sup> In their 2014 comment on the Local Plan, the University indicated that students vary in their accommodation needs and are free to choose where to live and that the proposed policy will not change that and would be difficult/impossible to enforce.



where they choose to live. The existing policy wording, which encourages PBSA for full time higher education Guildford based students on campus locations where appropriate is considered to be supportive and appropriate. The Council acknowledges that the University continue to make a significant contribution to meeting the needs of students wishing to use campus accommodation and continues to add to its supply. This supply compares favourably with the majority of Universities across the country. The Council also acknowledge students will continue to choose to live off campus and this is reflected in the OAN with a component specifically added for anticipated increased student numbers.

## Question 8 - Green Belt

*Policy P2: Green Belt. I have read the Green Belt Topic Paper, the SA and the Green Belt and Countryside Study, but please can the Council provide me with a single paper setting out (a) a clear explanation of what it considers to be the strategic level exceptional circumstances justifying the release of the amount of Green Belt land indicated in the plan and its broad spatial distribution; (b) an explanation of what it considers to be the local level exceptional circumstances relating to each specific site from the Green Belt; and (c) an explanation of why it considers that there are exceptional circumstances that require the addition to the Green Belt between Ash Green Village and Ash and Tongham. The paper should including references to the Green Belt Review and SA as appropriate.*

### Introduction

- 8.1 This paper seeks to synthesise all of the relevant information justifying the approach taken in relation to the Green Belt. In order to be as concise as possible the main paper deals primarily with matters of principle with further detail being provided in a series of appendices.
- 8.2 In relation to (a), the paper will set out the **strategic level considerations** relevant to the exceptional circumstances justifying amending Green Belt boundaries.<sup>64</sup> This primarily comprises the need to meet the Borough's development needs, in particular housing need. However, it also includes the Local Plan's approach to the inseting of villages, major previously developed sites and traveller sites in the light of national policy on the subject.
- 8.3 In relation to (b), the paper will then set out the **local level considerations** relevant to the exceptional circumstances justifying amending Green Belt boundaries in the following spatial locations:
- (i) Guildford urban area extensions;
  - (ii) A new settlement at the former Wisley airfield; and
  - (iii) Extensions to villages, including sensitive Green Belt sites where development is justified
- 8.4 Finally, in relation to (c), the paper will summarise the exceptional circumstances justifying **additional Green Belt around Ash and Tongham.**
- 8.5 The primary evidence base for this paper is the Green Belt and Countryside Study (GBCS). This comprehensive study has been prepared over a number of years and consists of six volumes. A short summary of its contents, which may assist in understanding the approach taken in each of its volumes, is set out in Appendix 1.

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<sup>64</sup> The question helpfully seeks to distinguish between strategic and local level considerations. However, in doing so GBC should not be taken to have lost sight of the policy test, which is singular and which requires consideration of strategic and local considerations in combination.

## **(a) Strategic Level Considerations**

### **(i) Meeting development needs in accordance with the spatial strategy**

- 8.6 This section takes as its starting point Guildford's objectively assessed need (OAN) of 654dpa. How that OAN has been derived is discussed in detail in the Housing Delivery Topic Paper, as well as in the answer to *Question 1: Calculating the objectively assessed need for housing*.
- 8.7 In developing the broad spatial distribution/spatial strategy, the Council created a spatial hierarchy<sup>65</sup> of places / growth locations in order of relative sustainability to which a sequential approach was applied when identifying sufficient sites to meet needs.
- 8.8 The spatial strategy adopts a brownfield first policy which seeks to maximise suitable and available sites within existing settlements prior to allocating greenfield and/or Green Belt sites. The following spatial locations are considered to be the most sustainable options for growth and were assessed first to understand the maximum quantum of development that could be gained through the use of the most sustainable locations:
- Within Guildford town centre
  - Within Guildford, and Ash and Tongham urban area
  - Within inset villages
  - Limited infilling within identified Green Belt villages
  - Redevelopment of previously developed sites in the Green Belt
- 8.9 Maximising suitable and available development opportunities within these spatial locations yields a potential of 3,495 homes<sup>66</sup>. Combining this figure with completions since 2015, outstanding permissions and trend based assumptions for windfall and rural exception sites (a further 3,426 homes) results in a total of 6,921 homes or 56% of OAN.
- 8.10 Utilising these options therefore provided wholly insufficient land to meet Guildford's OAN and necessitated exploration of the next spatial location at which growth should be focussed, namely within Countryside Beyond the Green Belt (CBGB). Consideration of the CBGB led to the identification of an urban extension to Ash and Tongham, an area which is not subject to other constraints such as the Thames Basin Heaths Special Protection Area or Surrey Hills AONB. Maximising sustainable development opportunities on CBGB provided a further 1,125 homes. Combined with the previous supply this yielded a potential supply of 8,046 homes or 65% of Guildford's OAN.
- 8.11 The fact that the full OAN could not be met from sites outside the Green Belt, together with limited infilling within Green Belt villages and PDL sites within the Green Belt, is not surprising given the Green Belt designation covers 89% of the borough (a

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<sup>65</sup> See Housing Delivery Topic Paper, paras 4.35 onwards

<sup>66</sup> Figures all sourced from LAA 2017, page 19

further 2% is CBGB and existing urban area covers 9%). The extent of Green Belt coverage in the Borough severely restricts the potential supply that can be gained through non-Green Belt sites. In spite of maximising all other non-Green Belt options, this would result in a significant undersupply compared to the OAN, including an undersupply against the extensive 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.

- 8.12 In summary therefore, it is the lack of suitable sites outside of the Green Belt which are available to meet OAN, and the consequences of there being a significant shortfall in housing supply, which provides the primary 'strategic level' justification for amending Green Belt boundaries. In addition, as explained within the answer to *Question 3: The housing trajectory*, the Council faces a range of constraints to early delivery of housing. A number of the Green Belt sites, which do not face the same constraints, are able to contribute towards early delivery in the plan period. This is a further 'strategic level' consideration.
- 8.13 In light of these conclusions, a detailed assessment of Green Belt sites was undertaken on a on a site-by-site basis<sup>67</sup>. This detailed assessment is explored in more detail later in this paper and relates to the following set of spatial locations:
- Guildford urban extensions
  - New settlement at the former Wisley airfield
  - Development around villages, including sensitive Green Belt sites where development is justified
- 8.14 The outcome of this assessment yielded a further supply of 6,145 homes through the amending of Green Belt boundaries. The number of homes in each spatial location was considered commensurate with their position in the hierarchy; 3,350 homes on Guildford urban area extensions, 2,000 homes at the new settlement at Wisley airfield and 795 homes around the villages. This combined with the previous total results in a potential supply 14,191 homes. Whilst this represents potential additional provision of 1,700 homes, this is considered necessary to meet Guildford's needs and will only be potentially realised towards the end of the plan period or if not delivered will be incorporated into a subsequent Local Plan. It therefore provides sufficient flexibility to deliver the housing requirement. The justification for this is discussed in more detail in *Question 2: Unmet housing need in the housing market area*.
- 8.15 The Sustainability Appraisal 2017 provides a summary of the spatial strategy alternatives assessed as part of the iterative plan-making process. It also sets out in more detail the sequential approach taken to developing the chosen spatial strategy as well as developing the other reasonable alternative spatial strategy options that were assessed (see Chapter 6).

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<sup>67</sup> See Housing Delivery Topic Paper, paras 4.120 to 4.164

(ii) Insetting villages

- 8.16 National Policy indicates that where the open character of a village makes an important contribution to the openness of the Green Belt the village should be included in the Green Belt. However, if not (or if the character of needs to be protected for other reasons), the village should be excluded from the Green Belt (NPPF, para 86).
- 8.17 The GBCS (Volume IV) assesses whether the open character of each village makes an important contribution to the openness of the Green Belt. Following this exercise, the GBCS recommends that a number of villages should be inset from the Green Belt and identifies an amended Green Belt boundary. The Green Belt and Countryside Topic Paper explains in more detail where there have been a small number of amendments to that originally recommended in the GBCS.<sup>68</sup> For ease of reference the relevant paragraphs are set out in Appendix 2
- 8.18 The change in policy approach between PPG2 and the NPPF in relation to inset villages, together with the detailed consideration of each village, constitute the exceptional circumstances required to amend Green Belt boundaries around selected villages.

(iii) Insetting major previously developed sites

- 8.19 National policy requires that land which it is unnecessary to keep permanently open should not be included in the Green Belt (NPPF, para 85). In light of this, the Council considers that, if major previously developed sites are of sufficient scale and do not possess an open character, it is not necessary for them to remain within the Green Belt.
- 8.20 Doing so also enables the uses that are currently on the sites greater flexibility in terms of how the site is utilised and enables greater scope for development or redevelopment, where appropriate. This will ensure they are better able to meet their future needs by removing unnecessary restrictions.
- 8.21 Volume V<sup>69</sup> of the GBCS recommends a number of major previously developed sites which should be inset. These are Mount Browne Police Headquarters; HM Prison, Send; The University of Law, Guildford; Peasmarsh Industrial Estate; Pirbright Barracks; Keogh Barracks; Pirbright Institute. In addition to the recommended sites in the GBCS, there are two further sites, the details of which are contained in Appendix 3.

(iv) Insetting traveller sites

- 8.22 Planning Policy for Traveller Sites (PPTS) (2015), says (paragraph 17):

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<sup>68</sup> GBCS, paras 4.14-4.23

<sup>69</sup> GBCS, Volume V, Section 20

*‘Green Belt boundaries should be altered only in exceptional circumstances. If a local planning authority wishes to make an exceptional, limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green Belt) to meet a specific, identified need for a traveller site, it should do so only through the plan making process and not in response to a planning application. If land is removed from the Green Belt in this way, it should be specifically allocated in the development plan as a traveller site only.’*

- 8.23 Given that national guidance indicates that: *‘Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the ‘very special circumstances’ justifying inappropriate development on a site within the Green Belt<sup>70</sup>*, any proposed site allocations for traveller pitches or travelling showpeople plots in the Green Belt, need to be inset from the Green Belt to ensure their delivery.
- 8.24 It is considered that exceptional circumstances exist to amend Green Belt boundaries to inset selected traveller sites as it is in accordance with NPPF paragraph 85 (bullet 1) which states that when defining Green Belt boundaries local planning authorities should *‘ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development’*.
- 8.25 The Council has explored a number of different ways in which to meet traveller need. This includes direct provision by the Council where appropriate, and provision on strategic site allocations to create mixed, sustainable and inclusive communities. However this is not sufficient to meet needs and therefore it has been necessary to explore the extent to which traveller sites that currently have temporary planning permission in the Green Belt could be made permanent and where existing permanent sites in the Green Belt could be reconfigured in order to increase accommodation. Only a combination of all approaches will enable the identified traveller need to be met.
- 8.26 Whilst Volume VI of the GBCS has assessed which traveller sites have defensible boundaries that enable them to be inset from the Green Belt, the decision to inset and identification of exceptional circumstances is on the basis of ensuring consistency with the strategy for meeting identified requirements for sustainable development.<sup>71</sup>
- 8.27 The identification of, and justification for, traveller sites which should be inset within the Green Belt is set out in Appendix 4.

**(b) Local level considerations**

- 8.28 Part of justifying exceptional circumstances is considering on a site-by-site basis the harm to the Green Belt should these sites be removed and the extent to which the

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<sup>70</sup> NPPG; Paragraph: 034 Reference ID: 3-034-20141006

<sup>71</sup> Commentary regarding the approach to travellers including the impact on Green Belt sensitivity is included in the Sustainability Appraisal 2017 in Section 10.9: Housing in particular paragraph 10.9.9 and accompanying Table 10.1.

consequent impacts on the purposes of the Green Belt may be ameliorated or reduced.

8.29 This section, together with the Appendix 5, sets out the local level considerations relating to the specific site allocations, in the order they appear in the spatial hierarchy:

(i) Guildford urban area extensions

8.30 Urban extensions around Guildford are considered to be the next most sustainable spatial location. Guildford urban area is the largest urban area in the Borough, is very well served by public transport and contains many services and facilities. As set out above, further work was undertaken in GBCS Volume II addendum to identify PDAs regardless of land parcel sensitivity (which was assessed against the extent to which the land parcel met Green Belt purposes). The following extract from paragraph 4.4 of the study explains the rationale for doing so and the Green Belt sensitivity assessment that was subsequently prepared:

*“The Green Belt purposes sensitivity information can be used by the Council to guide development to the less sensitive areas, but will inevitably be influenced by other background information, including the Council’s chosen spatial strategy, confirmed growth requirements and how the Council interprets the requirement to meet their objectively assessed housing needs. For this reason, Potential Development Areas have been identified, and retained, within some mid and higher sensitivity parcels. This does not imply that all such areas should be allocated for development within the Council’s subsequent Local Plan Document, but identifies those areas that might be appropriate if there is a need to introduce development to those more sensitive parts of the Green Belt in order to meet the Council’s growth requirements.”*

8.31 Given the PDAs around the urban areas consist of the entire land parcel, there would be greater subsequent harm to the Green Belt should these sites be allocated when compared to the other urban extensions that are located on land assessed to be of lesser sensitivity. However, Green Belt sensitivity is not the sole determining factor. Instead, other sustainability and environmental factors are considered alongside the Green Belt harm to determine whether exceptional circumstances exist to warrant the allocation of further sites in spite of greater Green Belt harm.

8.32 As a starting position, the Council has sought to protect land which has been assessed as high sensitivity Green Belt. It is therefore considered appropriate to exclude in the first instance any sites that fall within a red (high sensitivity) land parcel. There are no green (low sensitivity) sites. Therefore the two strategic yellow (medium sensitivity) sites are proposed to be allocated.

8.33 These sites are Blackwell Farm and Gosden Hill Farm. Both sites are of a scale that enables the delivery of a greater level of supporting infrastructure as part of a mixed

use development. These two sites together with the smaller urban extension – Land north of Keens Lane (also a medium sensitivity site) - are discussed in Appendix 5.

(ii) A new settlement at Wisley Airfield

8.34 The former Wisley airfield is located in a medium sensitivity land parcel. Given the partly brownfield element of the site, the sustainability merits of strategic sites due to the infrastructure that can be provided alongside them, the extent to which it can help deliver the homes needed and the NPPF support given to this development option<sup>72</sup>, this site is also included as an allocation in the Submission Local Plan.

8.35 The detailed justification for removing this site from the Green Belt is set out in Appendix 5

(iii) Extensions to villages

8.36 This option has the potential to be a sustainable option so long as careful consideration is given to the choice of location, where it can enhance or maintain the vitality of rural communities. This development option is also very important in terms of maximising opportunities to significantly boost the supply of housing as required by the NPPF. The plan is heavily reliant on the delivery of larger strategic sites to meet OAN, the delivery of which in full or part are linked to identified infrastructure requirements, either set out in the respective site policies or cross-referenced to the Infrastructure Schedule. The strategic sites delivering significant housing numbers are closely situated to, and potentially adversely impacting, the Guildford section of the A3. Accordingly, delivery reflects the timing of appropriate schemes to limit their impact on the Strategic Road Network in advance of the A3 Guildford Road Investment Strategy (RIS) scheme, or other appropriate transport mitigation, which is expected to be completed in 2027. For this reason, it is important to consider smaller sites, such as those around villages, which are able to deliver in the early years to ensure that whilst much of the supply is back loaded, a concerted effort is nevertheless being made to boost the sustainable supply of housing in the early years.

8.37 In accordance with the NPPF, development should be directed to villages which are or can be made more sustainable through additional growth. This spatial option is however lower in the hierarchy, and for that reason the council considers that, as a starting position, in order to maintain the integrity of the Green Belt, growth should be limited to those sites that are located in green (low sensitivity) land parcels only .

8.38 The details of the sites on the edge of villages proposed for removal from the Green Belt is set out in Appendix 5.

(iv) Sensitive Green Belt sites around villages where development is justified

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<sup>72</sup> NPPF, paragraph 52



- 8.39 Whilst the Council considers as a starting position that development on medium and high sensitivity Green Belt is inappropriate, it is still necessary to assess whether there are particular benefits in doing so which would serve to outweigh the Green Belt harm and justify the exceptional circumstances for removing them from the Green Belt. The Council considers that there are two sites identified as having a medium sensitivity in which the specific circumstances justify their removal from the Green Belt.
- 8.40 These sites are Garlick's Arch, Send Marsh Burnt Common and Ripley; and Land around Burnt Common warehouse, London Road, Send. The details of these sites proposed for removal from the Green Belt is set out in Appendix 5.

**(c) Additional Green Belt around Ash and Tongham**

- 8.41 In essence/summary the 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;
  - the level of development that is already being directed towards Ash and Tongham, much of it outside of the emerging Local Plan process through piecemeal and ad-hoc planning applications<sup>73</sup>;
  - location within AGLV and candidate AONB.
- 8.42 The detail of these considerations, and the overall justification for adding the sites to the Green Belt, is set out within the Green Belt Topic Paper<sup>74</sup>.
- 8.43 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.

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<sup>73</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>74</sup> See Green Belt and Countryside Topic Paper, paragraph 4.98 to 4.118

8.44 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.

## Question 8 - Appendix 1: Summary of the Green Belt and Countryside Study (GBCS)

8.45 The content of each is as follows:

- **Volume I** – summary, introduction and background to the study (Volumes I – IV only)
- **Volume II** – this volume divides the whole borough up into distinct land parcels each of which is assessed regarding the extent to which they meet the four main purposes of the Green Belt (all parcels were considered to meet Purpose 5: to assist in urban regeneration, by encouraging the recycling of derelict and other urban land). It then goes on to identify Potential Development Areas (PDAs) around the urban areas of Guildford, and Ash and Tongham. A sieving approach was adopted in relation to identifying PDAs around Guildford urban area with land parcels scoring ‘3’ or ‘4’ of the Green Belt purposes excluded from further assessment. This reflected the highly sensitive nature of these land parcels and the Green Belt harm that would result if they were developed given the strategic scale of the PDAs which consisted of the entire land parcel. The sieving approach was not adopted for land around Ash and Tongham given that this is designated Countryside beyond the Green Belt (albeit the parcels were assessed for the extent to which they met Green Belt purposes).
- **Volume II addendum** – this was prepared in response to an overall review of the Local Plan evidence base in 2014. It amended the way in which two Green Belt purposes were assessed<sup>75</sup>, necessitating an entire re-assessment of all land parcels against Green Belt purposes. It also identified further PDAs around Guildford urban area, irrespective of their Green Belt sensitivity, given the sustainability merits of development in this location. Doing so would enable the consideration of a wider set of factors to inform the site selection process.
- **Volume III** – this volume identifies smaller-scale PDAs around the villages. This was prepared at the same time as Volume II but it did not adopt the sieving approach that had been applied to PDAs around Guildford urban area (namely that of excluding any highly sensitive Green Belt). If such an approach had been applied, a number of the villages, potentially including those which performed well in terms of environmental constraints and sustainability criteria would not have been considered. Doing so would enable the consideration of a wider set of factors to inform the site selection process.
- **Volume IV** – this volume was undertaken following publication of the NPPF and paragraph 86 which states that only villages that make an important contribution to the openness of the Green Belt should be included in the Green Belt. It includes recommendations of which villages should be inset from the Green Belt.

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<sup>75</sup> This refers to Purpose 3: safeguarding the countryside from encroachment and Purpose 4: preserving the setting and special character of historic towns. See GBCS, Volume II Addendum, paragraph 2.3 to 2.6

- **Volume V** – this volume explored a number of different spatial strategy options to help inform decisions regarding the spatial distribution of development. This includes the following:
  - (a) potential expansion of settlements located in adjoining boroughs into land located in Guildford borough
  - (b) potential expansion of villages located within or bordering the Surrey Hills Area of Outstanding Natural Beauty (AONB). This recognised that the NPPF (paragraph 116) states that major development should be refused except in exceptional circumstances. At that time ‘major development’ was not defined and decisions had taken a varied view. Since then the draft NPPF has been published which defines ‘major development’ as 10 or more homes<sup>76</sup>.
  - (c) further consideration of Countryside Beyond the Green Belt (CBGB) given its lower status compared to Green Belt on which the Government places great importance.
  - (d) potential expansion or redevelopment of major previously developed sites - a similar approach is considered applicable to major previously developed sites as it is to villages in relation to whether they should remain washed over or be inset from the Green Belt.
  - (e) potential major expansion of the most sustainable villages – whilst Volume III identified smaller-scale PDAs around the villages, this identified Potential Major Development Areas (PMDAs) around the most sustainable villages as assessed in the Settlement Hierarchy.
  - (f) potential creation of a new settlement at former Wisley airfield.
- **Volume VI** – this volume assessed whether Gypsy and Traveller sites that currently lie within the Green Belt can be appropriately inset from the Green Belt

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<sup>76</sup> Draft NPPF, Glossary

## Question 8 - Appendix 2: Insetting in Villages

- 8.46 The following extract from the GBTP identifies the villages which should be inset from the Green Belt, together with the relevant justifications for this approach:

*“4.14 Volume IV of the Green Belt and Countryside Study (GBCS) in 2012 assesses all of our villages and recommends that the following villages should be inset from the Green Belt: Chilworth, East Horsley, Effingham, Fairlands, Flexford, Gomshall, Jacobs Well, Normandy, Peasmarsh, Ripley, Send, Send Marsh/ Burnt Common, Shalford, Shere, West Horsley and Wood Street Village.*

*4.15 The draft Local Plan (2014) proposed to inset all the recommended villages with the exception of Gomshall and Shere. Informed by consultation responses to the Issues and Options document, we considered that they should remain in the Green Belt. The GBCS assesses that parts of Gomshall have an open character with visual connections to the wider Green Belt. We consider that this is also applicable to parts of Shere. These factors are considered to remain relevant and we therefore continue to propose in the Submission Local Plan that Gomshall and Shere are not inset from the Green Belt.*

*4.16 Whilst the majority of the detailed Green Belt inset boundaries have been informed by the findings of the GBCS (Volume IV), there have been a number of small amendments where it has been demonstrated, through either consultation comments or further consideration, that there exists an alternative, more appropriate, boundary. In each instance, we consider the change to be justified on the basis that it accords with the principles of: only retaining the Green Belt designation on land that makes an important contribution to the openness of the Green Belt, and ensuring that new boundaries utilise physical features that are readily recognisable and likely to be permanent. More detail on where amendments have been made is set out below.*

*4.17 East Horsley: the Green Belt boundary has been extended to run along the tree belt to the west of Fangate Manor Farm. This forms a stronger and more continuous defensible boundary, and creates a clearer western edge to the village with open Green Belt beyond.*

*4.18 Effingham: Whilst the GBCS recommends that the land between Browns Lane and Manorhouse Lane should be inset, the study does conclude at Stage 3 that there are visual connections to open land within the Green Belt located across King George V playing fields (which forms the majority of this area). For this reason we consider that there is justification to exclude this open land from the inset boundary.*

*4.19 Fairlands: the GBCS recommends that the Green Belt boundary should run from the north from Aldershot Road to Fairlands Road and then extend around the properties located to the east of Fairlands Road. The Green Belt boundary has been extended to abut the inner edge of the Aldershot Road along the entire length. This helps to ensure that the boundary is readily recognisable.*

*4.20 Flexford: The GBCS recommends that the Green belt boundary follows, for the most part, the railway line to the north of the village. To help ensure that the boundary is readily recognisable, this has been extended to run along the railway line for the entire length of the northern edge of the village. The Green Belt boundary has also been extended at the south-western corner of the village to include the plot of land at Westholme, located behind the properties on Green Lane East. The northern*

*edge of this plot consists of a thick tree belt which constitutes a more defensible Green Belt boundary.*

*4.21 Ripley: The GBCS recommends that the Green Belt boundary to the north of the village follows a footpath within Ripley Green and then hedgerows and fencelines located to the north of residential development on Ripley High Street. The footpath does not in its current form constitute a physical feature that is readily recognisable. For this reason the Green Belt boundary has been amended to run along Newark Lane and the High Street. The built up part of the village that is now excluded from the Green Belt has been included within the identified settlement boundary (see section on 'limited infilling in villages').*

*4.22 Send: The GBCS recommends that the Green Belt boundary runs along the woodland edge between Potters Lane and Sandy Lane, thereby excluding the lakes from the Green Belt. This has been amended to follow the woodland/tree belts along the edge of the lake. This forms a defensible and easily recognisable boundary.*

*4.23 Send Marsh: The GBCS recommends that the Green Belt boundary runs along a tree belt north of Send Marsh Road to the western edge of the properties on Danesfield. This does not constitute a physical feature that is readily recognisable. The Green Belt boundary has been amended to follow the tree belt along the access road off Polesden Lane, and the tree belt and fence line south and west of Danesfield. This helps to ensure that the boundary is readily recognisable."*

## Question 8 - Appendix 3: Insetting major previously developed sites

- 8.47 The identification of, and justification for, major previously developed sites which should be inset is set out within Volume V of the GBCS. In addition to those sites, the Local Plan identifies two further sites which should be inset.

### Henley Business Park (referred to in the GBCS as BTRE Vokes)

- 8.48 At the time Volume V was being prepared, the majority of the built development previously on this site had been demolished in accordance with the planning permission for significant redevelopment for 28,000 sq. m of industrial floorspace. The GBCS's conclusions in relation to openness were therefore correct at that time. However, once the approved scheme is completed, the site would no longer possess this quality and we therefore consider that it would be unnecessary to retain in the Green Belt. The site is currently being built out.

### Send Business Centre

- 8.49 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.
- 8.50 Send Business Centre and Tannery Studios have been supported by the Enterprise M3 (EM3) Local Enterprise Partnership (LEP) through infrastructure funding. EM3 have provided a 5-year loan of £156k from their infrastructure fund to improve the internet infrastructure and shore-up the wharf. The LEP funding contributed to part of the contractor mobilisation, connection and installation and testing charges to enable geographical resiliency.
- 8.51 In the first round of funding, McLaren and Send Business Centre were the only private sector beneficiaries. Demonstrating successful implementation, Send Business Centre were subsequently approved a £1.3m loan to convert part of the existing buildings and refurbish them into a sound and video hub to support Guildford's unique creative digital supply chain. Guildford is at the centre of this unique supply chain, with educators including the Academy of Contemporary Music (ACM) and University of Surrey who provide graduates in computer gaming, sound and related fields, as well as being at the centre of the video games, virtual effects and animation sectors. Tannery Studios seeks to become the creative hub at the core of this.
- 8.52 There are existing buildings on the site, which are mainly unused. In the short-term, work is underway to convert them into additional studio space with meeting rooms and small offices using the LEP loan. This work is due for completion in early 2018. The combination of location, reliable high-speed broadband and specialist facilities,

including sound and video production studios is thought to be one of only a handful in the region. Tannery Studios already accommodates 60 businesses and they hope the loan and their partnerships with the University of Surrey and SETSquared (university incubator) will help identify and mentor start-ups as well as promote their growth. Over the next few years, this investment will help create an estimated 400 new direct and indirect jobs, and in the process revitalise a former industrial site.

- 8.53 It is hoped that the provision of local facilities and a creative hub will reduce the number of creative graduates from The ACM and University of Surrey lost to London. Pulling together a cluster of creative companies means that they are able to work together and create a collaborative atmosphere of open innovation.
- 8.54 Longer-term, there is potential for significant expansion of 6-7,000 sq m on to the vacant land adjacent. This is likely to be phased over the plan period and will help meet identified employment needs. Initial master planning ideas show sensitive design to complement the surroundings given its location in the Green Belt and proximity to the River Wey. The combination of these factors, which are unique to this site, constitute the exceptional circumstances to justify removing it from the Green Belt.



## Question 8 - Appendix 4: Insetting Traveller Sites

8.55 The identification of, and justification for, traveller sites which should be inset within the Green Belt is set out in Volume VI of the GBCS and below. The Council has accepted the recommendations of Volume VI of the GBCS in relation to the following sites:

- Cobbetts Close, Normandy.
- Land rear of Roundabout, White Hart Lane, Wood Street Village.
- The Orchard, Puttenham Heath Road, Puttenham.
- Valley Park Equestrian Centre, East Shalford Lane, Shalford.
- Land rear of Palm House Nurseries,

8.56 A different approach to that recommended has been taken on a number of sites, which are discussed in more detail below. The Council has also sought to minimise the harm associated with the inseting of these sites by placing additional restrictions on those that are considered to be particularly sensitive.

### Rose Lane, Ripley

8.57 This site was not recommended for inseting on the basis that whilst the northern and eastern boundaries were defensible, the southern and western boundaries were less so, consisting at that time of post and rail fencing only. As a result, the draft Local Plan (2014) did not propose to inset this site from the Green Belt. Since preparation of the study, part of the site has received a new temporary permission on the basis that the temporary harm is outweighed by other considerations, including the particular family circumstances. It is also considered that the southern boundary is now more permanent and defensible since planting has been introduced. Whilst there is some planting on the western boundary, it is sparser in nature. However, given the nature of the remaining three sides, it is considered that it is easily recognisable of the ground and will therefore be an appropriate basis upon which to draw a Green Belt boundary.

8.58 However, it is acknowledged that in spite of inseting, this site remains sensitive in terms of the impact that development here may have on the surrounding Green Belt and adjoining Conservation Area. For this reason, planning permission for this site will be restricted to the family named in the relevant appeal and any needs arising from that family, given the role of personal circumstances in the granting of the permission. Should any other traveller family wish to occupy this site, planning permission will be required, and an assessment will be made of whether the harm to surrounding Green Belt and any other harm is outweighed by the benefits. To further limit the extent to which this site may impact upon the openness of the surrounding Green Belt and the adjoining Conservation area, there is a restriction on the size and height of any ancillary buildings and a requirement to maintain the site's defensible boundaries.

#### Four Acre Stables, Normandy

- 8.59 The site was recommended for insetting. However, the boundaries proposed were significantly greater than the site size in order to follow more defensible nearby features. This site has a complex history and is likely to be challenging in planning terms over the plan period. Personal circumstances were a significant contributory factor to the temporary planning permission granted on the site. There has been a number of enforcement issues related to development that has taken place on this land. Whilst the Council wish to provide sufficient pitches on this site to meet the needs of this family over the plan period, the Council wishes to retain control of the way in which this site is developed and seek to limit any harm to the wider Green Belt. For this reason, the larger site is not proposed to be inset. Instead, it is considered there is sufficient planting within the site to form an appropriate southern Green Belt boundary that is capable of being easily recognisable. The eastern boundary follows a ditch/small stream.
- 8.60 It is considered that this site area will provide sufficient space for the identified and expected needs whilst preventing further encroachment to the south, up to Aldershot Road, where development would harm the Green Belt and have an adverse impact on the character of the area.
- 8.61 However, it is acknowledged that in spite of insetting, this site remains sensitive in terms of the impact that development here may have on the surrounding Green Belt. For this reason, planning permission for this site will be restricted to the family named in the relevant appeal and any needs arising from that family, given the role of personal circumstances in the granting of the permission. Should any other traveller family wish to occupy this site, planning permission will be required, and an assessment will be made of whether the harm to surrounding Green Belt and any other harm is outweighed by the benefits. To further limit the extent to which this site may impact upon the openness of the surrounding Green Belt, there is a restriction on the size and height of any ancillary buildings and a requirement to maintain the site's defensible boundaries.

#### Home Farm, Effingham

- 8.62 The site was recommended for insetting. However given that the identified need is already living in the area (e.g. overcrowded households in Home Farm), and the Council is seeking to provide public pitches on its own land, and retain ownership and management, the most appropriate approach to provision in this area was considered rural exception pitches, rather than insetting. This site has been granted planning permission and is under construction.

#### Green Lane East, Normandy

- 8.63 The site was recommended for insetting. However, given sufficient alternative sites that are capable of meeting assessed needs in a sustainable way have been allocated, the Council do not consider that the exceptional circumstances exist to justify amending Green Belt boundaries to inset this site.

## Question 8 - Appendix 5: Local Level Considerations

8.64 This Appendix identifies the sites which the Local Plan proposes to remove from the Green Belt, and provides the site specific considerations in relation to each of them.

### (1) Guildford Urban Area Extensions

#### *Blackwell Farm*

8.65 This site was identified in the draft Local Plan (2014) and consisted of land parcels H1 and H2 (see appendix 2 for an extract from the GBCS indicating the different land parcels). However, land parcel H1 is categorised as highly sensitive red Green Belt and is located partly in the AONB and entirely within the Area of Great Landscape Value (AGLV). Development on this land parcel would have had a major impact upon the openness of the Green Belt and the valued landscape, particularly in terms of the setting of the ancient woodland from the Hogs Back.

8.66 Following a re-appraisal of this site for the Regulation 19 (Local Plan (2016)), the site was reduced to only include the northern part of the site as the developable area (land parcel H2). The northern land parcel is outside the AONB and only a very small corner is designated AGLV. Development of the site is not considered to have a significant impact on the AGLV as it is on the very edge of the site adjacent to open countryside and, as required by policy D4 and site allocation A26, the design of the site will need to respond to the transition from urban to countryside. The removal of H2 reduced the capacity of the site by approximately 650 homes.

8.67 The Regulation 19 Local Plan (2016) also included a small proposed extension to the north west of the site, near the railway line, into land parcel H4. The reason for doing so is that the remainder of the site, with the exception of the proposed research park extension, drains naturally to a culvert under the railway close to the northern edge of this proposed extension. Whilst balancing and attenuation features will be necessary throughout the site to provide sustainable drainage systems, an attenuation feature is necessary in direct association with this culvert. As a piece of necessary infrastructure to support the delivery of the site, it was considered appropriate to extend the Green Belt boundary to include this field as part of the urban extension. Avoiding the need for part of the planning application to include development within the Green Belt will help ensure the site is deliverable. The extension to the site increased the capacity of the site by approximately 200 homes. Due to the presence of defensible boundaries and the visual containment of the proposed extension, it was not considered that this would harm the main purposes of the Green Belt and the benefits of doing so would therefore outweigh any harm.

8.68 The site will also provide a range of other uses that benefit the future occupants and the wider community, and provide or contribute towards a significant level of infrastructure. This includes traveller pitches, a new local centre with associated community and retail uses, a primary school, a significant expansion of the Surrey Research Park, Suitable Alternative Natural Greenspace (SANG) and other open space, the western route section of the Sustainable Movement Corridor on the site

and a necessary and proportionate contribution to delivering this on the Local Road Network linking the site to the town centre and beyond, and a necessary and proportionate contribution to delivering the Guildford West (Park Barn) railway station. A significant change since the Regulation 19 Local Plan (2016) is that the site is now also accommodating an up to six form entry secondary school. The secondary school will be located to be accessible to both occupiers of the site and the existing urban area of Guildford. The playing fields are proposed to be located outside the site within the Green Belt but will remain easily accessible to the secondary school. Doing so ensures the efficient use of land, thereby minimising the quantum of land to be removed from the Green Belt, and is consistent with the NPPF which requires that local planning authorities plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access and to provide opportunities for outdoor sport and recreation. It is also consistent with emerging national policy in the draft NPPF<sup>77</sup>.

- 8.69 A particular benefit of allocating Blackwell Farm is that it enables an extension to the Surrey Research Park which is key to meeting the OAN for employment. It is also a unique opportunity that enables us to build on knowledge-based employment that is of regional significance. This is strongly supported by the Enterprise M3 Local Enterprise Partnership (EM3 LEP) as it aligns strongly within their ambitions for innovation and enterprise across the Enterprise M3 LEP area, particularly around the development of 5G technology for which the University of Surrey is playing a key part. This type of specialist employment could not be provided elsewhere in the borough.
- 8.70 Due to the overall reduction in size, the total capacity of the site has been reduced from 2,250 to 1,800 homes ( $2,250 - 650 + 200 = 1,800$ ), with a minimum of 1,500 to be delivered within the plan period. The site requires an access off the A31 and it is proposed to use the existing access road, Down Place, located in land parcel H1. The road is however currently narrow and would therefore require upgrading. This could result in a new road parallel to the existing on the up-hill side of the road. Whilst it does also run through both AONB and AGLV, the impact that the upgrading would have on the landscape can be mitigated through the retention and enhancement of the tree cover already present along its length.
- 8.71 On this basis, the Council considers that the significant benefits of development at this site as set out above outweigh the harm that may be caused by removing this land from medium sensitivity Green Belt. This constitutes the local level exceptional circumstances required to amend Green Belt boundaries in this location within the context of the strategic level exceptional circumstances identified earlier in this paper which justify the amending of the Green Belt boundary within Guildford.

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<sup>77</sup> Draft NPPF, paragraph 144(b)

### *Gosden Hill Farm*

- 8.72 This site was also identified in the draft Local Plan (2014) and has remained a proposed allocation. This site is also of a scale (total capacity of 2,000 homes) which will provide other uses that benefit the future occupants and the wider community, and provide or contributes towards a significant level of supporting infrastructure. This includes traveller pitches, a new local centre with associated community and retail uses, a primary school, a secondary school, a new strategic employment site, Suitable Alternative Natural Greenspace (SANG) and other open space. It will also deliver significant transport infrastructure including an improved junction on the A3, a park and ride facility, the eastern route section of the Sustainable Movement Corridor on the site and a necessary and proportionate contribution to delivering this on the Local Road Network linking the site to the town centre and beyond, and land and a necessary and proportionate contribution to delivering the Guildford East (Merrow) railway station. 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. Consistent with the approach taken at Blackwell Farm, a minimum of 1,700 is expected to be delivered within the plan period.
- 8.73 In order to ensure that the site is of a sufficient scale to deliver the necessary mix and quantum of development alongside the supporting infrastructure, a small increase to the site area was proposed in the north-eastern corner along the A3, into an adjoining land parcel. The increase in site size ensures the planned capacity of the site is deliverable at a density which is appropriate for its location on the edge of the urban area. It also enables sufficient land to deliver the scale of associated infrastructure which is greater than that required to mitigate its own impact. In particular, it facilitates the delivery of a four form entry secondary school. The secondary school will provide for sufficient school capacity for needs arising from the planned development of the site and, in combination with the school at Wisley Airfield (discussed below), provide for the additional educational need arising in the eastern part of the borough.
- 8.74 It is important to note that whilst the Green Belt boundary has been drawn to follow defensible features, the developable area of the extension is smaller. Given the openness of the area of land directly adjacent to the A3, it is not considered appropriate for this to be developed. Instead, whilst it is proposed to be excluded from the Green Belt, it must stay open as a green buffer helping to maintain the openness along this stretch of the A3 and the sense of separation between Guildford and Send Marsh/ Burnt Common.
- 8.75 In addition to the formal and informal open space which will be delivered within the site, the playing fields and SANG are proposed to be located outside the site within the Green Belt. This will ensure the playing fields are easily accessible to the secondary school which is proposed to be located in the north of the site near the Park and Ride. Doing so ensures the efficient use of land, thereby minimising the quantum of land to be removed from the Green Belt, and is consistent with the NPPF which requires that we plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access and to provide opportunities

for outdoor sport and recreation. It is also consistent with emerging national policy in the draft NPPF<sup>78</sup>.

- 8.76 On this basis, the Council considers that the significant benefits of development at this site as set out above outweigh the harm that may be caused by removing this land from medium sensitivity Green Belt. This constitutes the local level exceptional circumstances required to amend Green Belt boundaries in this location within the context of the strategic level exceptional circumstances identified earlier in this paper which justify the amending of the Green Belt boundary within Guildford.

*Land north of Keens Lane*

- 8.77 This site was also identified in the draft Local Plan (2014) and has remained a proposed allocation although its capacity was increased in the 2017 version. This is a small site capable of delivering 150 homes (up from 140 homes previously). Whilst the entire land parcel (J3) is identified as a PDA in the GBCS, the northern part of the PDA extends into the 0-400m buffer of the SPA within which residential development is inappropriate. There are however other uses that may be appropriate and we have considered these as part of the re-appraisal of sites. Subject to satisfactory control of any associated car parking, pets and the mobility of residents, care homes are allowed within the 400m buffer. The West Surrey SHMA: Guildford Addendum identifies a need for 433 care home bedspaces (C2 use class) in Guildford and this site presents a suitable location for a 60-bed care home which helps utilise land which would otherwise be inappropriate for development. Whilst consideration has been given to the extent to which the remainder of the PDA could help in meeting other identified needs, for example employment or retail (see LAA), there are other more suitable sites which are preferable to this one. For this reason the Council do not consider the full PDA suitable for allocation and have instead, using defensible boundaries within the site, allocated a smaller part of it.

- 8.78 On this basis, the Council considers that the benefits of developing this site outweigh the harm that may be caused by removing this land from medium sensitivity Green Belt. This constitutes the local level exceptional circumstances required to amend Green Belt boundaries in this location within the context of the strategic level exceptional circumstances identified earlier in this paper which justify the amending of the Green Belt boundary within Guildford.

(2) A new settlement – Wisley Airfield

- 8.79 This site is of a scale (approximately 2,000 homes) which will provide other uses that benefit the future occupants of the site as well as the wider community, and provides or contributes towards a significant level of infrastructure. This includes traveller pitches, a new local centre with associated community and retail uses, a primary school, a four form entry secondary school, a locally significant employment site, Suitable Alternative Natural Greenspace (SANG) and other open space.

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<sup>78</sup> Draft NPPF, paragraph 144(b)

- 8.80 The secondary school will provide for sufficient school capacity for needs arising from the planned development of the site and, in combination with the school at Gosden Hill Farm, provide for the additional educational need arising in the eastern part of the borough. Given the site is isolated, it is important that it is of a scale that enables the delivery for as many of the day-to-day services as possible on site. The provision of the local centre with community services, together with the primary and secondary school will help ensure that the site is relatively self-contained. Whilst residents are likely to need to travel for employment and higher order services the Council considers that the package of transport measures proposed on site will maximise opportunities for sustainable forms of travel. This includes a significant bus network, provided in perpetuity, to a range of nearby rail stations and service centres.
- 8.81 The site area within the Regulation 19 Local Plan (2016) was greater than that proposed in the draft Local Plan (2014). The site area increased further still in the Regulation 19 Local Plan (2017). This is as a result of additional land to the south of the site becoming available for development and therefore being included as part of the allocation. This additional land is consistent with the findings of the GBCS Volume V which identified a larger Potential Major Development Area as being potentially suitable for development.
- 8.82 Whilst a small western part of the site is designated as a Site of Nature Conservation Interest (SNCI) in the current Local Plan 2003, a larger area covering the northern part of the site is recommended as SNCI from a survey undertaken in 2007. The Submission Local Plan designates the larger SNCI. The design of the site will need to respond to the findings of this work in accordance with Policy ID4: Green and Blue Infrastructure. Given the survey identifies that the areas considered to be of high value are concentrated in a limited number of locations, the Council do not consider that this precludes development of the site and that appropriate mitigation or enhancement is possible.
- 8.83 On this basis, the Council considers that the significant benefits of development at this site as set out above outweigh the harm that may be caused by removing this land from medium sensitivity Green Belt. This constitutes the local level exceptional circumstances required to amend Green Belt boundaries in this location within the context of the strategic level exceptional circumstances identified earlier in this paper which justify the amending of the Green Belt boundary within Guildford.
- 8.84 A planning application for a new settlement on this site was refused by Guildford Borough Council. The outline application (Ref: 15/P/00012) was for up to 2,068 dwellings incorporating up to 100 sheltered accommodation units, eight traveller pitches and associated infrastructure. The scheme was refused for 14 reasons. Notwithstanding the current Green Belt designation, the individual reasons for refusal relate to the specifics of the submitted scheme rather than the principle of development in this location. The Submission Local Plan proposes to remove this land from the Green Belt and the Council considers the remaining reasons are capable of being overcome. The refusal was subject to an appeal and a public inquiry was held in September/October 2017. A decision by the Secretary of State is currently expected on 5 June 2018.

(3) Extensions to Villages

*East Horsley and West Horsley (north)*

- 8.85 Three sites are proposed to be allocated here, in total delivering 355 homes. East Horsley is defined as the most sustainable village in the Settlement Hierarchy - a Rural Service Centre. It should therefore be the focus for growth in the rural areas. It is assessed as being very sustainable due to the level of services and facilities available in the village. West Horsley (north), whilst not defined as a Rural Service Centre, is nevertheless a large village and physically adjoins East Horsley. We therefore consider that it functions as part of East Horsley. The sites are all within close proximity to the district retail and service centre and Horsley train station.
- 8.86 On this basis, the Council considers that the benefits of developing these sites outweigh the harm that may be caused by removing this land from low sensitivity Green Belt. This constitutes the local level exceptional circumstances required to amend Green Belt boundaries in this location within the context of the strategic level exceptional circumstances identified earlier in this paper which justify the amending of the Green Belt boundary within Guildford.

*Send*

- 8.87 One site is proposed to be allocated for 40 homes. The site is partly owned by the Council and we are seeking to deliver two traveller pitches on part of the site to help meet the borough-wide need. Provision of pitches on the edge of one of the more sustainable villages will help ensure better integration of our travelling and settled communities. Occupiers of new homes on this site would have good access to facilities such as education and health care.
- 8.88 On this basis, the Council considers that the benefits of developing this site outweigh the harm that may be caused by removing this land from low sensitivity Green Belt. This constitutes the local level exceptional circumstances required to amend Green Belt boundaries in this location within the context of the strategic level exceptional circumstances identified earlier in this paper which justify the amending of the Green Belt boundary within Guildford.

(4) Sensitive Green Belt sites around villages where development is justified

*Garlick's Arch, Send Marsh Burnt Common and Ripley*

- 8.89 The Regulation 19 Local Plan (2016) identified a site at Garlick's Arch located in a yellow (medium) sensitivity land parcel for 7,000 sqm of industrial land and 400 homes. The Employment Land Needs Assessment (ELNA) identifies a need for industrial land. This site is identified in the GBCS (Volume V) and was available and suitable to accommodate this use. The industrial use was removed from the site in the Regulation 19 Local Plan (2017) following concern raised regarding the compatibility of industrial use with residential and the benefits associated with allocating the industrial use on an alternative site (discussed further below). The site



also facilitates the provision of an A3 northbound on-slip and an A3 southbound off-slip at A247 Clandon Road (Burnt Common) (site policy 43a), which will provide mitigation to address the impacts of growth in particular related to the development of the former Wisley airfield, and is fully supported by Surrey County Council. This has been discussed with Highways England and subject to the submission of further technical and financial work they have confirmed that there is no in-principle objection to new north-facing slips at the existing junction. It is understood that the site promoter for the former Wisley airfield has submitted substantial additional information to Highways England relating to further technical and financial work to justify the new north-facing slips. The Council will continue to work with Highways England and the site promoter as required to address any outstanding requirements. With the removal of the industrial allocation, the Regulation 19 Local Plan (2017) added an allocation on the site for six Travelling Showpeople plots.

*Land around Burnt Common warehouse, London Road, Send*

- 8.90 The industrial uses that are no longer being met on the Garlick's Arch site are now proposed to be met on land around Burnt Common warehouse. This site is also located on medium sensitivity Green Belt and was proposed in the draft Local Plan (2014) for 7,000 sqm of industrial land and 100 homes but removed in the Regulation 19 Local Plan (2016) when it was replaced with Garlick's Arch. This was on the basis that the industrial uses could be accommodated on Garlick's Arch with an increased number of homes (400 instead of 100) to help meet early delivery. The swap also lessened perceived issues of coalescence with the Gosden Hill Farm urban extension and facilitated the delivery of the new slip roads.
- 8.91 As set out above, following concerns raised regarding the allocation of industrial uses on Garlick's Arch, this element of the allocation was moved in the Regulation 19 Local Plan (2017) to land around Burnt Common warehouse. The Burnt Common site has however been reduced in area to that previously identified in 2014 which addresses the issues related to perceived coalescence.
- 8.92 This site is also preferable for industrial development given it already has an element of employment on the site, is separate from residential development and has potential capacity for additional floorspace which could be justified through future borough employment land needs assessments should the identified need increase or industrial land be lost elsewhere. This provides some flexibility and certainty for meeting future needs given the difficulty in identifying suitable industrial land.
- 8.93 On this basis, the Council considers that the benefits of developing these two sites outweigh the harm that may be caused by removing this land from medium sensitivity Green Belt. This constitutes the local level exceptional circumstances required to amend Green Belt boundaries in this location within the context of the strategic level exceptional circumstances identified earlier in this paper which justify the amending of the Green Belt boundary within Guildford.