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# Guildford Local Plan Examination

Further Written Statement submitted on behalf of Martin Grant Homes

May 2018



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<b>Project Ref:</b>	21633/P10/A5	21633/P10A/A5	21633/P10b/A5
<b>Status:</b>	Draft	Draft	Final
<b>Issue/Rev:</b>	-	a	b
<b>Date:</b>	4 <sup>th</sup> May 2018	10 <sup>th</sup> May 2018	10 <sup>th</sup> May 2018
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Ref: 21633/P10b/A5/MK/dw

Date: 10<sup>th</sup> May 2018

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## **CONTENTS**

1.0	Introduction	1
2.0	Response to Main Matter 2	2
3.0	Response to Main Matter 3	6
4.0	Response to Main Matter 4	8
9.0	Response to Main Matter 9	10
11.0	Response to Main Matter 11 (Policy A25)	17

## **APPENDICES**

- 1 - Affordability Analysis Technical Note, prepared by Barton Willmore LLP (May 2018)
- 2 - Extracts from GLA Planning Committee response to New London Plan (March 2018)
- 3 - MGH Housing Delivery Trajectory for Gosden Hill, North East Guildford
- 4 - Burntcommon Connector Road Technical Note, prepared by i-Transport (May 2018)
- 5 - North East Guildford Park and Ride Technical Note, prepared by i-Transport (May 2018)
- 6 - Modifications to Policy A25 proposed by MGH
- 7 - Response to Issues 11.13 and 11.14, prepared by SLR Consulting (May 2018)



## 1.0 INTRODUCTION

- 1.1 This written statement is submitted on behalf of Martin Grant Homes (MGH) and has been prepared by Barton Willmore LLP, with input from other members of MGH's consultant team, principally, i-Transport (on Highways and Transportation matters) and SLR Consulting (on Green Belt and Landscape matters).
- 1.2 As set out in earlier representations, MGH owns (freehold) the Gosden Hill urban extension to the north east of Guildford. MGH is promoting Gosden Hill as a new sustainable neighbourhood. MGH fully supports the identification of Gosden Hill as a strategic urban extension in the Guildford Local Plan and confirms that the site is deliverable.
- 1.3 MGH and its consultant team is in ongoing pre-application discussions with Guildford Borough Council (GBC), Surrey County Council (SCC), Highways England (HE), Natural England (NE), Network Rail (NR) and other consultees.
- 1.4 MGH has met with representatives of the local community at earlier stages of the plan's preparation, sharing the initial masterplan proposals for Gosden Hill. MGH is committed to engaging with the local community as more detailed proposals are progressed.
- 1.5 MGH has started to prepare an outline planning application for the site and an EIA Scoping Report is due to be submitted to GBC imminently. MGH is targeting the submission of an outline planning application for the development of Gosden Hill, as the plan proceeds to adoption, in early 2019.
- 1.6 This further written statement supplements the representations submitted at the regulation 19 consultation stages in June/July 2016 and in June/July 2017. Our submissions respond to the outputs of ongoing discussions with GBC and the output of MGH's own technical work. We look forward to participating in the examination hearings and assisting the Inspector with his assessment of the plan's soundness and legal compliance.

## **MAIN MATTER 2: CALCULATION OF THE OBJECTIVELY ASSESSED NEED FOR HOUSING (OAN)**

*Are the calculations contained in the West Surrey SHMA Guildford Addendum Report an appropriate basis for establishing the OAN for Guildford? Relevant elements include:*

2.0.1 No, we do not consider full OAN for Guildford to be 654 dpa as established in the SHMA Addendum. Whilst the approach taken in the SHMA Addendum is broadly supported, we have particular concerns with the uplift applied to address housing affordability.

### ***2.1 Migration trends and unattributable population change.***

2.1.1 No comments.

### ***2.2 Student migration and its impact on the housing market.***

2.2.1 No comments.

### ***2.3 Market signals and the issue of housing affordability.***

2.3.1 The SHMA Addendum (paragraph 8.21) states that OAN of 654 dpa provides a 17% uplift to the starting point demographic projections. Whilst this is true, GBC's response to the Inspector's Initial Questions (GBC-LPSS-001) acknowledges that 17% is the aggregate impact of combined adjustments (paragraph 1.13). This includes: an affordability uplift; an uplift to support economic growth; and a further uplift to accommodate student growth.

2.3.2 However, in paragraphs 1.46 and 1.47 of GBC-LPSS-001, it is implied that the 17% uplift in total is a market signals uplift, which can be expected to improve affordability in Guildford Borough.

2.3.3 We do not agree that the SHMA's market signals uplift equates to 17% for the reason we detail below.



- 2.3.4 The SHMA Addendum (paragraph 5.48) details the 'affordability uplift' component as an increase to household formation rates amongst the 25-34 age group, returning these to the levels in 2001. Figure 15 of the SHMA Addendum illustrates that applying this adjustment to the official starting point (2014-based SNPP) of 557 dpa results in a need for 610 dpa – an increase of 53 dpa.
- 2.3.5 The affordability adjustment is therefore equivalent to 9.5% and not 17% as claimed by GBC.
- 2.3.6 The SHMA Addendum also presents a 'Rebased SNPP' scenario which takes account of the ONS 2015 Mid-Year Population Estimates (MYPE) published after the official 2014-based SNPP were published. This scenario identifies a need for 577 dpa increasing to 629 dpa with the application of the affordability adjustment which provides a slightly lower uplift of 9%.
- 2.3.7 Indeed, the SHMA Addendum (paragraph 8.17) refers to an upward adjustment of 9% to improve affordability when presenting economic-led need.
- 2.3.8 The additional adjustments which take the uplift from 9% to 17% are to support economic growth and student growth – they are not to improve affordability.
- 2.3.9 Furthermore, a 9% uplift is not considered sufficient to address the serious and worsening affordability of housing in Guildford. Median house prices are currently 12.53 times median workplace earnings – significantly in excess of the national average (7.91), and affordability has worsened by 159% between 1997 and 2017 – a higher rate than seen in the rest of the HMA, the regional average and the national average. Furthermore, in just the 2-years since 2015, Guildford's affordability ratio has worsened by 11% whereas both Waverley and Woking have seen improvements in affordability. See Chapter 2 of the accompanying Affordability Analysis technical note (**Appendix 1**).
- 2.3.10 As illustrated in Chapter 3 of the affordability technical note (**Appendix 1**), the OAN of 654 dpa as proposed by GBC would see housing affordability worsen in Guildford by 30% based on the approach to modelling the relationship of housing supply to affordability using the OBR house price and earnings forecasts and the University of Reading's house price elasticity research.

2.3.11 We consider an affordability uplift of 40% (capped) would provide a more positive response to the serious and worsening of housing affordability in Guildford. This level of uplift is in line with the Government's proposed Standard Method. Whilst we acknowledge that the Standard Method holds little weight at the current time due its consultation status, it does indicate the Government's intention with regards to local housing need and its approach to addressing affordability issues. Applied to the starting point household projection this would result in a need for 789 dpa in Guildford Borough.

2.3.12 In the context of the need for 1,119 dpa (providing a 101% uplift to the starting point - see **Appendix 1**; Chapter 3) in Guildford for there to be no deterioration in Guildford's affordability ratio over the plan period, an uplift of 40% should be considered prudent given the particular severity of housing affordability in Guildford Borough.

#### ***2.4 The need for affordable housing.***

2.4.1 No comments.

#### ***2.5 Employment growth.***

2.5.1 No comments.

#### ***2.6 Any other relevant matter.***

2.6.1 We note GBC's observation in its response to the Inspector's Initial Questions (GBC-LPSS-001; paragraphs 1.50 and 1.51) that the ONS have revised the Mid-Year Population Estimates (MYPE) for Guildford downwards. Whilst this is true, the revised 2015 MYPE is 145,056 which is only marginally lower than projected for 2015 (145,473) in the ONS 2014-based Sub National Population Projections (SNPP) which underpin the starting point household projection.

2.6.2 On this basis, we consider the original 2014-based SNPP scenario presented in the SHMA Addendum to remain robust.

- 2.6.3 Whilst new 2016-based SNPP are shortly due to be published by ONS (expected 24 May 2018) the accompanying 2016-based household projections are not due to be published until September 2018. Given we do not know what the Government's assumptions will be in relation to household formation rates, the implications of the 2016-based SNPP on local housing need should be made with caution.

## **MAIN MATTER 3: UNMET NEED IN THE HOUSING MARKET AREA (HMA)**

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

### ***3.1 The allowance of 83 dpa contained within the Waverley Local Plan.***

3.1.1 The allowance of 83 dpa contained within the adopted Waverley Local Plan apportions a 50% share of the current unmet housing need arising from the adopted Woking Core Strategy. The remaining 50% is presumed to be accommodated through the Guildford Local Plan as the other authority within the West Surrey HMA.

3.1.2 Whether this plan can accommodate a further 83 dpa, which would almost certainly require additional land to be released from Green Belt, it is clear that the housing need pressures within Guildford Borough and the HMA taken as a whole are so significant, that the level of housing provision proposed in the plan should be regarded as an absolute minimum.

### ***3.2 The constraints imposed by Green Belt and other designations, and the fact that it appears necessary for the plan to release substantial sites from the Green Belt in order to meet its own identified OAN.***

3.2.1 Green Belt, AONB, TBHSPA and other land use constraints have been taken into account by GBC in preparing its plan, balancing the need for housing and other development needs with, inter alia, the protection of the Green Belt.

3.2.2 GBC has concluded that exceptional circumstances can be demonstrated to justify a review of its Green Belt boundaries and for land including Gosden Hill to be released to help meet the full identified development needs of the Borough (notwithstanding our comments in response to Matter 2 above). MGH supports this decision which represents a positively planned, justified and effective plan strategy, which is consistent with national policy. However, the residual apportionment of Woking's unmet need clearly places increases pressure on Guildford to meet its own housing need and for this to be brought forward as quickly as possible, pending resolution of meeting the full OAN across the HMA.

### **3.3 *Any other unmet need issues.***

3.3.1 The GLA is currently preparing the London Plan, with a draft plan published for consultation in late November 2017. The GLA's Planning Committee responded to the consultation, advising that the London Plan was likely to result in a significant shortfall in housing provision within the capital (circa. 30,000 dpa, equating to approximately 10% of England's total housing need). As such, they recommended as an option that authorities approach across the wider south east for planning collaborate on preparing a strategic plan which should seek to meet this potentially significant shortfall. Locations such as Guildford are potentially well-placed to contribute towards a strategic approach to helping to meet this potentially nationally significant shortfall in housing provision.

3.3.2 Extracts from the GLA Planning Committee's response to the London Plan consultation are provided at **Appendix 2**.

## MAIN MATTER 4: HOUSING TRAJECTORY

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

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

4.1.1 We object to the stepped housing trajectory as set out in Policy S2 of the plan. GBC state that this is not intended to restrict higher levels of annual completions in the early years of the plan period, however, it is important that the "tilted balance" is applied to the determination of planning applications for new housing in the event that a sufficient five year housing land supply is not maintained by GBC, as is required by national planning policy.

4.1.2 On behalf of MGH, we confirm that the delivery of housing at Gosden Hill can be increased above the rate anticipated by GBC in Appendix 4 of its Housing Delivery Topic Paper (December 2017). This increased rate of delivery is forecast to occur principally in the middle and latter part of the plan period, between 2024 and 2029.

4.1.3 MGH's revised housing delivery trajectory for Gosden Hill, as shown in **Appendix 3**, should therefore contribute towards a 'levelling out' of housing supply over the plan period.

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

4.2.1 MGH has been in ongoing pre-application discussions with GBC, SCC and HE since 2016. More advanced discussions to review the site's development capacity, amendments to the Framework Masterplan and infrastructure delivery have progressed through 2017 and early 2018.

4.2.2 An EIA Scoping Report for Gosden Hill is due to be submitted imminently. MGH is targeting the submission of an outline planning application for the development of Gosden Hill in early 2019.

4.2.3 The timing of submitting the Gosden Hill application will be kept under review, taking account of, inter alia, the Local Plan's successful progress through the Examination, any issues arising from public consultation, and completion of the technical work required to support the planning application.

4.2.4 We anticipate that outline planning permission Gosden Hill could be secured by early 2020, allowing for the agreeing the s106 planning obligations necessary for the development. This would provide a two year period (approximately) to prepare any design code, prepare and submit reserved matters, discharge any pre-commencement conditions, implement first phase infrastructure and SANG, and first completions by 2022/23. A delivery trajectory for Gosden Hill is provided in **Appendix 3** of this statement.

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

4.3.1 Please refer to our response to Issue 11.12.

## **MAIN MATTER 9: SPATIAL STRATEGY, GREEN BELT AND COUNTRYSIDE PROTECTION**

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

**9.1** *Is the spatial strategy as set out in the preamble to Policy S2 sufficient to explain the plan's approach to the overall distribution of development and guide future development during the plan period?*

9.1.1 No. We consider this part of the plan to be unsound due to it not being effective. As drafted, the plan lacks clarity in its presentation of the spatial strategy, explaining the approach to the overall distribution of development during the plan period.

9.1.2 We note that the Council's response to the Inspector's initial questions (GBC-LPSS-001) seeks to resolve the concerns raised regarding the soundness of this part of the plan. Whilst GBC's proposed draft modifications provide some further clarity, we remain unconvinced that Policy S2 even with these additions would be sound. We therefore put forward an alternative approach to resolving this deficiency.

9.1.3 The preamble to Policy S2 should in our view be read alongside the Spatial Vision set out under paragraph 3.1 of the plan. Furthermore, we do not consider that Policy S2 itself provides the "spatial" development strategy as it does not present the distribution of new development across the Borough.

9.1.4 We recommend that GBC prepare modifications to the plan to recast the Policy S2 preamble, to sit alongside the plan's Spatial Vision and which would then form the plan's spatial development strategy policy.

9.1.5 Consequentially, the content of Policy S2 as drafted, should be incorporated within existing or potentially additional strategic policies. For example, in respect of Housing, an additional policy should be added to the plan, preceding Policy H1, which sets the overall housing requirement for the plan period, the distribution of future housing development proposed and, if found to be appropriate, any phased trajectory. This would include the draft proposed modifications contained in Question 4 - Appendix 1 of GBC-LPSS-001).



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

- ***The spatial distribution of existing and future need for housing***

9.2.1 Table S2b on page 39 of GBC's response to the Inspector's initial questions identifies the spatial distribution of the proposed supply of new housing. This shows that approximately 6,000 new homes of the identified total of 10,765 new homes (circa. 55%) are to be delivered within or adjoining Guildford.

9.2.2 Taking account of the overall sustainability of Guildford (see GBC's 'Settlement Hierarchy' report (May 2014) and 'Settlement Profiles' report (July 2013)), the proportion of overall housing provision directed to Guildford is considered relatively low and should be treated as an absolute minimum.

9.2.3 We support the statement at paragraph 8.30 of GBC's response to the Inspector's initial questions, that 'urban extensions around Guildford are considered to be the next most sustainable spatial location' after brownfield options have been exhausted. This is consistent with the ordering of "spatial locations" set out in Table S2b in GBC's response to the Inspector's initial questions (albeit Table S2b isn't presented as a sequential hierarchy) reflects the greater sustainability of locations such as Gosden Hill on the edge of and well-connected to Guildford.

- ***Movement patterns***

9.2.4 As part of the evidence base supporting the plan, extensive traffic modelling has been undertaken by SCC on behalf of GBC. The Guildford Borough Proposed Submission Local Plan Strategic Highway Assessment Report (SHAR) (June 2016), which is a strategic transport modelling study, which has assisted with the decision making surrounding the suitability of potential development sites and future highway mitigation proposals which have been identified. The future highway mitigation proposals were identified by GBC working with SCC, and relevant stakeholders. The modelling assessment made use of SCC's strategic transport model, SINTRAM.

9.2.5 The SHAR represents a robust “worst case” scenario in terms of transport demand and supply assumptions as it does not assess and, therefore, does not account for all mitigation, including the potential for modal shift encouraged by the new and improved sustainable transport choices provided by the rail, bus and active modes schemes included in the plan, and the possible increased internalisation of trips within the larger sites.

9.2.6 The results of the modelling which include the quantum and distribution of development proposed in the plan together with the key highway schemes, identifies that there will not be a severe impact on the local and strategic highway network, when compared against the Do-Minimum Scenario 1.

9.2.7 At a site-specific level, the plan identifies that the development of Gosden Hill is to be brought forward alongside a wide range of new transport measures, as set out on Policy A25. These will enhance the accessibility of the Gosden Hill, including by train and bus. The development will also provide an improved A3 access and contribute towards the creation of the eastern Sustainable Movement Corridor (SMC). The development of Gosden Hill will therefore be well-connected with Guildford.

9.2.8 Furthermore, development at Gosden Hill will include a range of retail and community services and facilities to meet the day-to-day needs of residents and is expected to include a range of employment opportunities, reducing the need to travel. Thus, Gosden Hill is considered to be a highly sustainable location for need housing.

- ***Green Belt and landscape impact***

9.2.9 MGH’s site specific comments relating to Gosden Hill prepared by SLR Consulting are provided in **Appendix 7** of this statement.

- ***Infrastructure provision and constraints***

9.2.10 As explained above and in our response to Matter 11 (Policy A25), Gosden Hill presents a significant opportunity to deliver large scale growth alongside the delivery of new strategic infrastructure. Thus, the development of the site is not constrained by infrastructure capacity.

**9.3 Are the proposed new business land and floorspace allocations in the right strategic locations? Relevant aspects are:**

***The spatial location of existing and future needs***

9.3.1 The Guildford Borough Employment Land Needs Assessment prepared by AECOM (March 2017) identifies that approximately 70% of additional demand for office development is anticipated to come forward in out-of-centre locations, as a continuation of the current distribution of office stock in the borough.

9.3.2 GBC's Employment topic paper (December 2017) sets out that a hierarchical approach is applied to the location of new employment uses. GBC specify that its preferred location for office and research and development floorspace is: 1. Guildford town centre, 2. district and local centres, and 3. edge of centre locations within 500m of public transport interchanges. The fourth stage in this hierarchy are new Strategic Employment Sites, which will include the new employment provision at Gosden Hill.

9.3.3 As a result of its location adjacent to the A3, and the future delivery of the proposed Guildford East Train Station and Park and Ride, new employment provision as part of the Gosden Hill urban extension will be sustainably located.

- ***Movement patterns***

9.3.4 See above.

- ***Green Belt and landscape impact***

9.3.5 See above.

- ***Infrastructure provision and constraints***

9.3.6 See above.

**9.4 *Having regard to the extent to which it is proposed to release Green Belt land and develop greenfield sites, do the plan's policies strike the right balance (in terms of housing provision) between the use of urban and previously developed land and urban extensions? Has the potential for further residential development in the urban area been adequately explored? (See also Item 5 of my initial questions.)***

9.4.1 In considering whether the plan's policies 'strike the right balance', paragraph 136 of the consultation draft changes to the NPPF includes a requirement for planning authorities to demonstrate that other reasonable options for meeting its identified need for development have been examined fully before "exceptional circumstances" are demonstrated. Whilst the consultation draft NPPF proposes transitional arrangements and so this policy would not apply to plan's submitted before the revised NPPF is published, we have nonetheless adopted the approach set out in paragraph 136 of the draft NPPF in responding to question 9.4.

*"a) makes as much use as possible of suitable brownfield sites and underutilised land:"*

9.4.2 Paragraph 8.8 of GBC's response to the Inspector's initial questions (GBC-LPSS-001) states that the plan's spatial strategy adopts a "brownfield first" policy. The capacity of brownfield sites and underutilised land is summarised in paragraphs 8.9 (see also Table S2b of GBC-LPSS-001).

9.4.3 Including the supply of 1,125 homes from Countryside Beyond the Green Belt (CBGB) in addition to the 6,921 homes identified from brownfield and windfall, GBC state that approximately 65% of Guildford's OAN can be met within the Borough. Therefore, a significant shortfall of some 35% would result without amendments being made to the Green Belt boundaries to meet development needs.

9.4.4 Paragraph 8.14 states that capacity for 6,145 homes through the amending of Green Belt boundaries needs to be identified in order to avoid a significant housing shortfall. This capacity including Gosden Hill has been identified by applying the sequential approach to the spatial hierarchy (non-PDL Green Belt options) set out in paragraph 8.13, where Guildford urban extensions are prioritised. We support the priority given to appropriate urban extensions to Guildford as the most sustainable location within the Borough.

*“b) optimises the density of development, including whether policies promote a significant uplift in minimum density standards in town and city centres, and other locations well served by public transport; and”*

9.4.5 This is primarily an issue for GBC to address. However, MGH would be concerned if unrealistic assumptions were to be made regarding the development capacity of town centres and locations well served by public transport which would likely provide undeliverable, thereby risking meeting the identified housing needs of the area and the delivery of the plan as a whole. In conclusion, we consider the urban capacity assumptions made by GBC to be ambitious but realistic and would regard any uplift to be unsound.

*“c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.”*

9.4.6 Guildford Borough is surrounded by similarly constrained (Green Belt, TBHSPA, AONB, flood risk) neighbouring authorities, where the capacity to accommodate unmet housing need in addition to their full OAN could potentially be restricted.

9.4.7 In its Duty to Cooperate topic paper (December 2017), GBC identify that requests have been made by a number of neighbouring authorities for unmet housing need to be accommodated within Guildford. As demonstrated by the representations included within the topic paper, such requests have been made by Woking, Surrey Heath and Runnymede.

9.4.8 Both Surrey Heath and Runnymede are progressing their own Local Plan reviews, with Surrey Heath Borough Council (SHBC) due to publish a preferred options plan in June 2018 and Runnymede Borough Council (RBC) due to submit its plan during summer 2018. Both of these authorities are expected to meet virtually all of their own housing need.

9.4.9 In respect of Woking, we have commented in response to Matter 3 that there is an urgent need for Woking Borough Council (WBC) to undertake a review of its Core Strategy which was adopted in October 2012. This should establish an up-to-date position on the capacity of Woking to accommodate its full OAN and the extent of any unmet housing need which may need to be met by neighbouring authorities including Guildford.

9.4.10 Similarly, there appears to be no prospect for Guildford exporting any of its housing need, as evidenced in GBC's Duty to Cooperate topic paper (December 2017). GBC advise that Surrey Heath, Woking, Runnymede, Spelthorne, Elmbridge, Epsom and Ewell, Mole Valley, Waverley, Rushmoor, Hart, East Hampshire, Chichester and Horsham were emailed in April 2014 to ask whether they had spare capacity to meet any unmet housing need. GBC state that no positive responses were received to the request.

## **MAIN MATTER 11: SITE ALLOCATIONS (POLICY A25, GOSDEN HILL, MERROW LANE, GUILDFORD)**

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

- 11.11.1 A technical note relating to Policy A25 Infrastructure requirement (2) for the Burntcommon connector road to an 'aspirational' all movements junction has been prepared by i-Transport on behalf of MGH and is provided at **Appendix 4**.
- 11.11.2 GBC's evidence supporting the plan demonstrates that neither the development of Gosden Hill nor the delivery of the Local Plan as a whole requires the delivery of this aspirational link. Furthermore, SCC as Highway Authority have confirmed that there is no 'need' to deliver this aspirational connector road in relation to Gosden Hill, or to deliver the submission Local Plan.
- 11.11.3 Furthermore, no scheme has been put forward by GBC to demonstrate that the delivery of a connector road is feasible or how funding would be secured.
- 11.11.4 Taking account of the above, Infrastructure requirement (2) in Policy A25 is unsound as it is unjustified and not effective. It should therefore be deleted from the plan.
- 11.11.5 Notwithstanding this objection, MGH's draft masterplan proposals for Gosden Hill have been designed to accommodate a network of roads and streets which can facilitate both the movements associated with Gosden Hill and not prejudice the potential opportunity for GBC to provide a connector road to the B2215 London Road/A247 Clandon Road. This would allow for a road with a suitable width to be provided within the site, providing a route from the primary access and its associated road, eastwards toward the north-eastern edge of the Gosden Hill allocation.
- 11.11.6 Therefore, in conclusion, while this aspirational connector road between the A3 / A3100 junction and the B2215 London Road/A247 Clandon Road is not necessary to deliver development at Gosden Hill or the Local Plan, and is therefore unsound, MGH is bringing forward draft masterplan proposals for the development of Gosden Hill which would not prejudice GBC's ability to explore through a future review of this Local Plan the potential for a connector road as part of a 'stretched' all movements junction, unrelated to the Gosden Hill development.

11.11.7 In respect of the park and ride, identified as Policy A25 Infrastructure requirement (3), i-Transport have prepared a technical note which summarises how a park and ride is to be accommodated within the development of Gosden Hill, the potential benefits in terms of reducing car traffic, and a proposed business case for its future operation. This note is provided at **Appendix 5**.

11.11.8 In summary, it is anticipated that a park and ride of between 500 and 750 car parking spaces could operate without public subsidy.

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

11.12.1 No. In fact, MGH consider that the delivery of housing at Gosden Hill can be accelerated in comparison with GBC's anticipated trajectory. MGH's delivery trajectory for Gosden Hill is provided at **Appendix 3**.

11.12.2 As stated above, MGH is promoting the development of up to 1,800 homes including affordable homes at Gosden Hill, all anticipated to be delivered within the plan period. In response, we seek modifications to part (1) - and consequently also to part (2)<sup>1</sup> - of the A25 Allocation requirements to reflect this realistic assessment of the capacity of Gosden Hill. MGH's proposed modifications to Policy A25 are set out in **Appendix 6**.

11.12.3 The transport strategy for Gosden Hill has been designed around providing a well-connected, sustainable development which is well-related to the urban edge of Guildford. While providing a range of day to day facilities on site, to internalise trips, the transport strategy will encourage the use of alternative modes to the private car, by facilitating the delivery of a new Park and Ride and Railway Station on site. The transport strategy therefore provides a real opportunity for residents to utilise public transport for their day to day movements, especially in respect to trips into Guildford and London.

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<sup>1</sup> In line with the approach set out in Policy H1 (part (7)), the allocation of Gypsy and Traveller pitches at Gosden Hill should be reduced to six, due to the reduced development capacity of up to 1,800 homes proposed by MGH.



- 11.12.4 The delivery of a new A3 southbound on slip, at a location on the A3 which is already three lanes in both direction and generally free flowing, will also provide a much needed additional southbound access to the A3. This improvement will reduce the pressure on the existing 'Dennis' southbound on slip, mitigating the impact of Gosden Hill and improving the situation on the A3 on the north west section of the A3 through Guildford.
- 11.12.5 This approach is confirmed in the SHAR (June 2016) which sets out that identified increases on the A3 southbound are in part as a result of the new southbound on-slip at Burpham, proposed to be implemented as part of the Gosden Hill Farm access junction. The report goes on to note (at paragraph 4.11.4) that *'Not only does this allow trips from the Gosden Hill Farm site to join at this point, but it also permits other users to re-route and join the A3 at this location instead of driving through Guildford and joining the s/b A3 at the Dennis junction'*.
- 11.12.6 In conclusion, therefore, the delivery trajectory for Gosden Hill will be unaffected by the A3 improvements being promoted by HE.

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

- 11.13.1 A separate note has been prepared by MGH's Landscape consultants, SLR Consulting, providing MGH's response to questions 11.13 and 11.14 relating to site-specific Green Belt issues (see **Appendix 7**).
- 11.13.2 In summary, this note sets out the "local level exceptional circumstances" for redrawing the Green Belt boundaries clearly at north east Guildford, using physical features that are readily recognisable, robust and permanent, comprising the A3, the railway line, Cotts Wood (proposed as SANG), other existing and proposed tree planting, all based on the land form. The note also sets out that the development at Gosden Hill will cause neither "sprawl" of the wider Guildford urban area, nor encroachment.

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

- 11.14.1 See under 11.13, above.

### **11.15 Other Matters**

11.15.1 In addition to the matters and issues above, we also wish to raise the following soundness issues relating to Policy A25:

#### Guildford East (Merrow) Train Station

11.15.2 Again for clarity and to ensure the policy wording is justified and effective, MGH seeks modification to Infrastructure requirement (7) so that the developer is required to provide land and necessary and proportionate contribution towards the delivery of the Guildford East (Merrow) railway station.

#### Traveller pitches (public)

11.15.3 MGH objects to the requirement under Infrastructure requirement (16) in Policy A25 that traveller pitches delivered at Gosden Hill should be provided to GBC at "nil cost". Such an approach is inconsistent with the approach to on-site affordable housing provision and would likely adversely impact on the viability of development.

11.15.4 Policy A25 and includes a detailed set of criteria relating to the provision of traveller pitches and these are repeated in plan policies for other strategic allocations. MGH recommends that these be deleted from individual site policies and, if considered appropriate, be added to Policy H1.

## **Appendix 1**

Affordability Analysis Technical Note, prepared by Barton Willmore LLP (May 2018)



---

# GUILDFORD BOROUGH

# AFFORDABILITY ANALYSIS

Prepared on behalf of Martin Grant Homes

**MAY 2018**



**GUILDFORD BOROUGH  
AFFORDABILITY ANALYSIS**

**Prepared on behalf of Martin Grant Homes**

<b>Project Ref:</b>	21633/A5/DM
<b>Status:</b>	Final
<b>Issue/Rev:</b>	01
<b>Date:</b>	10/05/2018
<b>Prepared by:</b>	DM
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**CONTENTS**

	<b>PAGE NO</b>
<b>1.0 INTRODUCTION</b>	<b>01</b>
<b>2.0 2017 AFFORDABILITY RATIOS</b>	<b>03</b>
<b>3.0 ADDRESSING AFFORDABILITY: A REVIEW OF APPROACHES</b>	<b>05</b>
<b>4.0 SUMMARY AND CONCLUSIONS</b>	<b>10</b>



## 1.0 INTRODUCTION

- 1.1 This Note has been prepared by Barton Willmore on behalf of Martin Grant Homes to present affordability analysis for Guildford Borough to support representations to the Guildford Borough Local Plan Examination.
- 1.2 Matter 2 (Calculation of the Objectively Assessed Need for Housing (OAN)) specifically asks whether the calculations contained in the West Surrey SHMA Addendum Report (dated March 2017) are an appropriate basis for establishing OAN for Guildford?
- 1.3 The SHMA Addendum presents full OAN for Guildford of 654 dwellings per annum (dpa) which provides a reduction from the OAN established for Guildford in the original SHMA (September 2015) of 693 dpa. The lower OAN is attributed to a reduction in employment growth.
- 1.4 Despite the reduction in OAN, the SHMA Addendum and subsequent Council's response to the Inspector's Initial Questions on OAN, claims that Guildford's OAN of 654 dpa provides a 17% uplift to the starting point household projections and implies that the 17% uplift can be expected to improve affordability in the Borough.
- 1.5 The SHMA Addendum (paragraph 8.15) states that affordability can be improved through either higher net migration or higher household formation. As such, in paragraph 1.13 of the Council's response to the Inspector's Initial Questions the Council do acknowledge that the 17% uplift is the aggregate impact of combined adjustments: an adjustment to household formation rates for people aged 25-34 years; an uplift to support economic growth; and a further uplift to accommodate student growth.
- 1.6 Whilst OAN of 654 dpa does provide an uplift of 17% to the starting point household projection of 557 dpa according to the 2014-based series published by the Ministry of Housing Communities and Local Government (MHCLG), we do not agree that the 17% uplift in its entirety can be classified as a market signals uplift to improve affordability in Guildford as required by Planning Practice Guidance (PPG)<sup>1</sup>.
- 1.7 Additional migration to support economic growth will not improve affordability – it will provide more housing to support a larger workforce to support economic growth. Likewise, the uplift to support student growth will only serve to meet the needs of the student population, not the wider housing market. Therefore, we consider that only the SHMA Addendum's adjustment to household formation rates has the potential to improve affordability in Guildford.

---

<sup>1</sup> MHCLG, March 2014, PPG ID: 2a: Housing and Economic Development Needs Assessment

1.8 The adjustment applied by the SHMA Addendum to household formation rates for 25-34 year olds is equivalent to 9%. This is confirmed in paragraph 1.11 of the Council's response to the Inspector's Initial Questions. Furthermore, in paragraph 8.17 of the SHMA Addendum when presenting economic-led housing need it states the following in relation to the household formation rate adjustment:

**"Applying this to the economic-led need for 579 dwellings per annum, results in an upward adjustment of 9.0% increasing the assessed housing need to 631 dpa."**<sup>2</sup>

1.9 We do not consider that a 9% uplift is sufficient to improve affordability in Guildford Borough.

1.10 This Note presents the analysis to support our view that a 9% affordability uplift is insufficient in Guildford Borough and is structured as follows:

**Section 2** presents more recent affordability evidence since the SHMA Addendum was published, namely the ONS 2017 affordability ratios, to demonstrate the severity of the affordability issues in Guildford.

**Section 3** considers different approaches to addressing affordability issues. This includes the OBR house price and earnings forecasts/ University of Reading affordability calculator and the Government's proposed Standard Methodology.

**Section 4** summarises our analysis and provides recommendations.

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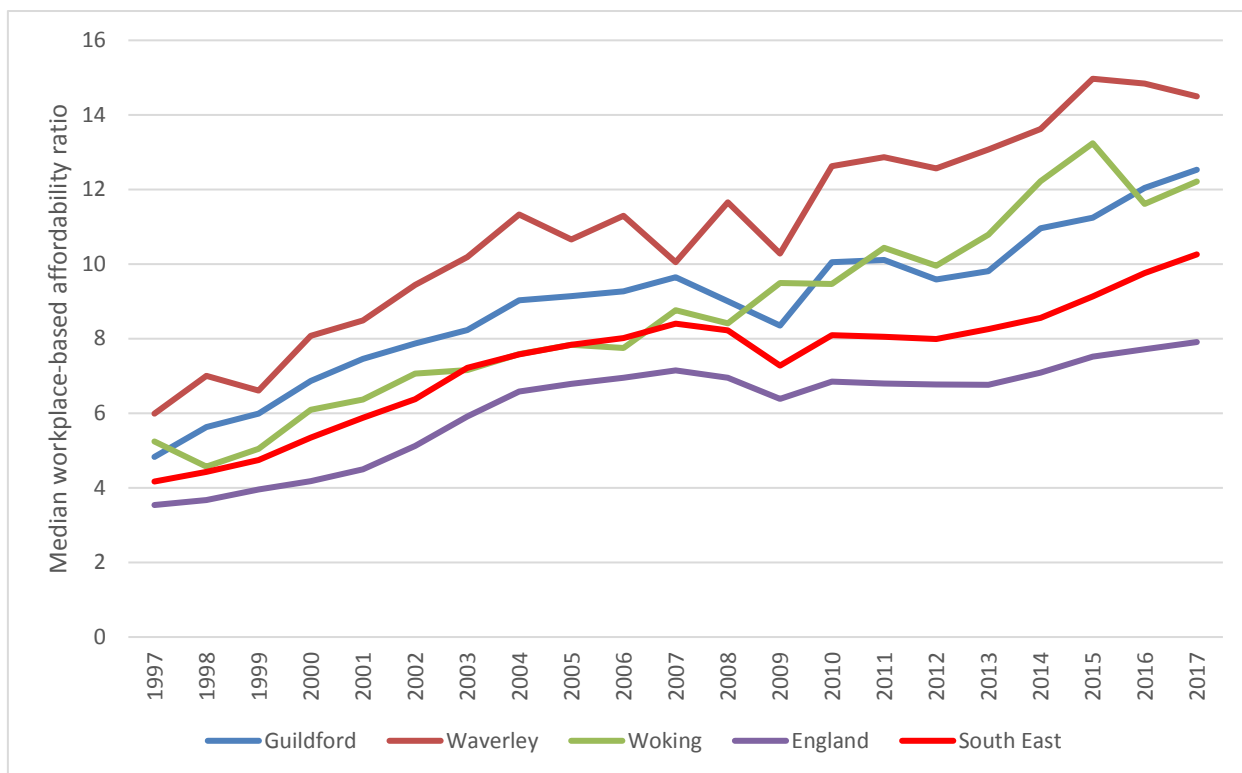
<sup>2</sup> GL Hearn, March 2017, West Surrey Strategic Housing Market Assessment: Guildford Addendum Report 2017, paragraph 8.17

## 2.0 2017 AFFORDABILITY RATIOS

2.1 Since the SHMA Addendum was published, the Office for National Statistics (ONS) have published affordability ratios for the year 2017 (published April 2018). Both lower quartile (LQ) and median affordability ratios are available, derived from LQ/ median workplace-based earnings in relation to LQ/ median house prices.

2.2 The 2017 ratios show a further worsening of housing affordability in Guildford as illustrated in Figure 2.1. Ratios for Waverley and Woking have also been included to set Guildford’s affordability ratios in the context of the wider Housing Market Area (HMA), alongside regional and national comparators. Table 2.1 presents change over the period 1997 to 2017. The analysis below is based on the Median workplace-based ratios.

**Figure 2.1: Historic affordability ratios**



Source: ONS/Barton Willmore

**Table 2.1: Absolute and percentage change in affordability ratio, 1997-2017**

	Median workplace-based affordability ratio			
	1997	2017	Absolute Change 1997-2017	% Change 1997-2017
Guildford	4.83	12.53	7.70	159%
Waverley	5.99	14.50	8.51	142%
Woking	5.24	12.21	6.97	133%
South East	4.17	10.26	6.09	146%
England	3.54	7.91	4.37	123%

Source: ONS/Barton Willmore

- 2.3 Table 2.1 identifies that in 2017 a median priced house in Guildford would cost 12.53 times median workplace-based earnings. This is significantly higher than the national average of 7.91 and the regional average of 10.26.
- 2.4 Whilst Guildford’s affordability ratio is not as high as Waverley’s (14.50), Guildford has seen a greater proportional worsening in affordability since 1997. Between 1997 and 2017 Guildford’s median workplace-based affordability ratio increased by 159%, in comparison to just 142% in Waverley; the regional average of 146%; and the national average of 123%.
- 2.5 We note in the Council’s response to the Inspector’s Initial Questions (paragraphs 1.23 and 1.24) that it does not consider it necessary to take account of the deterioration in affordability since the plan’s 2015 base date, which is attributed to completions falling 41% below the OAN of 654 dpa. However, in just 2-years (between 2015 and 2017) Guildford’s affordability ratio has worsened by 11% - in contrast both Waverley and Woking have seen an improvement in affordability of -3% and -8% respectively.
- 2.6 we consider the analysis above demonstrates the significant affordability issues that exist in Guildford and how it has worsened to a greater extent than the rest of the HMA, the region and nationally.
- 2.7 Affordability clearly needs addressing in Guildford and we do not consider that a 9% uplift is sufficient in the context of the severity outlined above. We consider the various approaches to addressing affordability within the next section of this note.

### 3.0 ADDRESSING AFFORDABILITY: A REVIEW OF APPROACHES

3.1 The SHMA Addendum (paragraph 8.14) recognises the need to provide an upward adjustment to improve affordability. We support this view. However, we do not consider that a 9% uplift is sufficient.

3.2 Within this Section we demonstrate that the Council's OAN for Guildford of 654 dpa would lead to a worsening of affordability, not an improvement, and consider what levels of house building would be required to improve affordability. We set this analysis within the context of the affordability uplift proposed by the Government's Standard Methodology.

**i) OBR house price and earnings forecasts/ University of Reading affordability calculator**

3.3 The current PPG (ID2a-020) states how an adjustment for market signals (which includes affordability) should increase housing supply by "an amount that could be expected to improve affordability". However, no guidance is provided as to how such an uplift should be measured or provided.

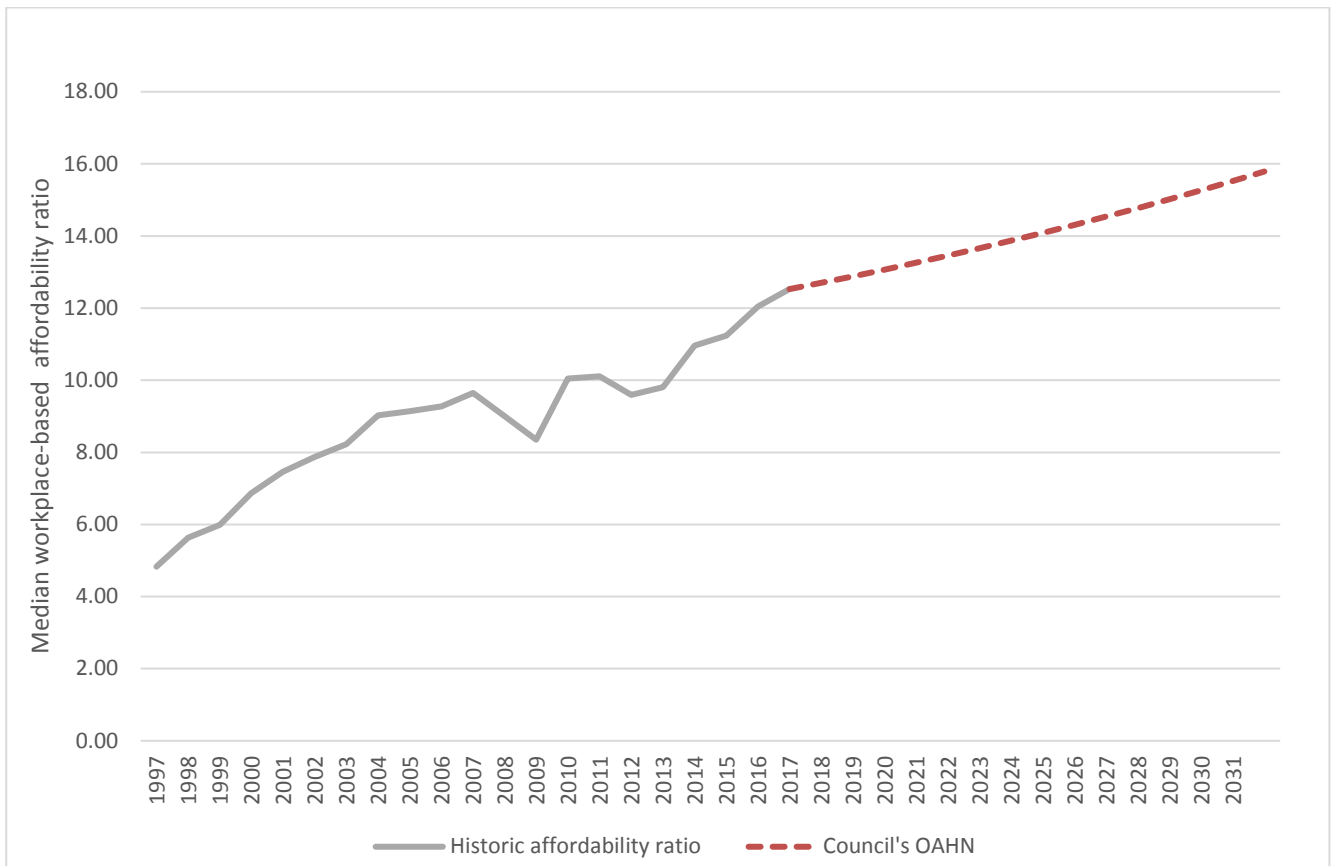
3.4 At both the Mid Sussex Local Plan Examination and Waverley Local Plan Examination, evidence was submitted using OBR house price and earnings forecasts and the University of Reading's house price elasticity research to identify the impact on the affordability ratio of a given future housing supply and also how many dwellings would be required to maintain the affordability ratio at current 2017 levels. We have replicated this analysis for Guildford.

3.5 This approach identifies that if Guildford's future housing supply was based on the Council's OAN of 654 dpa, the affordability ratio in Guildford would worsen by 30% between 2017 and 2034 (from 12.53 to 16.54) as illustrated in Figure 3.1.

3.6 In order to maintain the 2017 affordability ratio of 12.53 by 2034, the analysis suggests a need for 1,119 dwellings per annum in Guildford.

3.7 Figure 3.2 presents the detailed affordability calculator for Guildford.

**Figure 3.1: Impact on Guildford's affordability of Council's OAN of 654 dpa**



Source: Barton Willmore



Figure 3.2: Median affordability calculator for Guildford

Median Affordability Calculator																		
<div style="border: 1px solid black; padding: 2px; display: flex; align-items: center;"> <span style="margin-right: 10px;">Guildford</span> <span style="font-size: 1.2em;">▼</span> </div>																		
Earnings rate of increase =	1.031 (OBR March 2017)																	
Housing Price rate of increase =	1.048 (OBR March 2017)																	
*Number of homes taken from 2016 Council Tax Base																		
Implicit dwelling growth in OBR model	623 per annum (2016-2031)																	
	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034
Median Earnings	34,322	35,386	36,483	37,614	38,780	39,982	41,222	42,499	43,817	45,175	46,576	48,020	49,508	51,043	52,625	54,257	55,939	57,673
Median House price	430,000	450,640	472,271	494,940	518,697	543,594	569,687	597,032	625,689	655,722	687,197	720,183	754,751	790,979	828,946	868,736	910,435	954,136
Number of homes* (assuming 1% growth as per OBR)	58,019	58,599	59,185	59,777	60,375	60,979	61,588	62,204	62,826	63,455	64,089	64,730	65,377	66,031	66,691	67,358	68,032	68,712
Median affordability Ratio	12.53	12.73	12.94	13.16	13.38	13.60	13.82	14.05	14.28	14.52	14.75	15.00	15.24	15.50	15.75	16.01	16.28	16.54
Total annual dwelling increase =	654 per annum (Council's OAN)																	
No. of houses	58,019	58,673	59,327	59,981	60,635	61,289	61,943	62,597	63,251	63,905	64,559	65,213	65,867	66,521	67,175	67,829	68,483	69,137
Increase in supply above baseline assumption		0.1%	0.2%	0.3%	0.4%	0.5%	0.6%	0.6%	0.7%	0.7%	0.7%	0.7%	0.7%	0.7%	0.7%	0.7%	0.7%	0.6%
Price change (assuming -2.0)		-0.3%	-0.5%	-0.7%	-0.9%	-1.0%	-1.2%	-1.3%	-1.4%	-1.4%	-1.5%	-1.5%	-1.5%	-1.5%	-1.5%	-1.4%	-1.3%	-1.2%
Median House price including reduction	430,000	449,505	470,007	491,562	514,226	538,059	563,126	589,492	617,229	646,412	677,119	709,434	743,444	779,241	816,923	856,593	898,360	942,337
New ratio	12.53	12.70	12.88	13.07	13.26	13.46	13.66	13.87	14.09	14.31	14.54	14.77	15.02	15.27	15.52	15.79	16.06	16.34
Dwellings required to keep affordability ratio constant =	1119 per annum																	
No. of houses	58,019	59,138	60,258	61,377	62,496	63,616	64,735	65,854	66,974	68,093	69,212	70,332	71,451	72,570	73,690	74,809	75,928	77,048
Increase in supply above baseline assumption		0.9%	1.8%	2.7%	3.5%	4.3%	5.1%	5.9%	6.6%	7.3%	8.0%	8.7%	9.3%	9.9%	10.5%	11.1%	11.6%	12.1%
Price change (assuming -2.0)		-1.8%	-3.6%	-5.4%	-7.0%	-8.6%	-10.2%	-11.7%	-13.2%	-14.6%	-16.0%	-17.3%	-18.6%	-19.8%	-21.0%	-22.1%	-23.2%	-24.3%
Median House price including reduction	430,000	442,348	455,155	468,445	482,243	496,576	511,473	526,964	543,080	559,855	577,326	595,532	614,512	634,309	654,971	676,544	699,082	722,638
New ratio	12.53	12.50	12.48	12.45	12.44	12.42	12.41	12.40	12.39	12.39	12.40	12.40	12.41	12.43	12.45	12.47	12.50	12.53

**ii) Government's proposed Standard Methodology**

- 3.8 The Draft National Planning Policy Framework (NPPF) and accompanying Draft Planning Practice Guidance (PPG), both published by MHCLG for consultation in March 2018, outline the Government's proposals for a Standard Methodology for establishing housing need at local authority level across the country.
- 3.9 The proposed Standard Method seeks to address affordability issues by applying an adjustment to the latest MHCLG/ ONS household projection based on the local median workplace-based affordability ratio. Based on the 2017 affordability for Guildford (12.53) the adjustment would be equivalent to a 53% uplift demonstrating the severity of affordability in Guildford.
- 3.10 However, the Standard Method caps the level of uplift, depending on the status of the Local Plan. In those authorities that have not reviewed or adopted their plan in the last five years (as in Guildford) a cap of 40% is applied to whichever is higher of the projected household growth for their area over the 10 years according to the household projections (564 hpa for Guildford) or the annual housing requirement set out in their most recent plan, if one exists. As Guildford Borough does not have a Local Plan, the 40% cap would be applied to the household projection and would result in local housing need of 789 dpa.
- 3.11 The 40% affordability uplift attributed to Guildford under the Standard Method is considered to provide a more positive response to the severe affordability issues in Guildford in comparison to the 9% uplift provided in the SHMA Addendum.
- 3.12 Whilst we acknowledge that the Standard Method holds little weight at the current time due to its consultation status, it does indicate the Government's intention with regards to local housing need and its approach to addressing affordability issues.

**iii) Benchmarking affordability adjustments**

- 3.13 Figure 6 of the Council's response to the Inspector's Initial Questions benchmarks the SHMA Addendum's 17% uplift to improve affordability alongside uplifts applied in other local plan examinations. It concludes that the 17% uplift applied in Guildford is appropriate, in light of Guildford's LQ affordability ratio – with Guildford falling on the trend-line of those authorities considered.
- 3.14 We disagree with the conclusion reached. The benchmarking analysis has not been undertaken on a like-for-like basis, with comparisons made against some authorities that have seen a flat

rate market signals uplift and some authorities that have seen an uplift based solely on a headship rate adjustment. As a result, the trend-line is skewed.

## 4.0 SUMMARY AND CONCLUSIONS

- 4.1 This Note has demonstrated a serious and worsening affordability of housing in Guildford which should be addressed by providing an upward adjustment to housing need based solely on household projections.
- 4.2 Despite the SHMA Addendum claiming to provide a 17% uplift to the starting point household projection, we consider the affordability component of this uplift is only equivalent to 9%, with the remaining uplift provided to support economic and student growth.
- 4.3 A 9% uplift is not considered sufficient in Guildford where median house prices are currently 12.53 times median workplace earnings – significantly in excess of the national average (7.91), and where affordability has worsened by 159% between 1997 and 2017 – a higher rate than seen in the rest of the HMA, the regional average and the national average. Furthermore, in just the 2-years since 2015, Guildford's affordability ratio has worsened by 11% whereas both Waverley and Woking have seen improvements in affordability.
- 4.4 Our analysis based on the credible approach to modelling the relationship of housing supply to affordability using the OBR house price and earnings forecasts and the University of Reading's house price elasticity research, has identified that if future housing supply in Guildford is based on the Council's OAN of 654 dpa, then Guildford's affordability ratio would continue to worsen, reaching 16.34 by 2034 – an increase of 30% between 2017 and 2034. Such a worsening in housing affordability would not be supportive of the current NPPFs Core Planning Principles (paragraph 17) to identify and meet the housing needs of an area, taking account of market signals, such as land prices and housing affordability.
- 4.5 To experience no deterioration in Guildford's affordability ratio over the emerging plan period, we have identified a need for 1,119 dpa which provides a 101% uplift from the starting point household projections (557 dpa) demonstrating the significant increase in housing supply required in Guildford. This method aligns with that used in Mid Sussex and Waverley.
- 4.6 The Government's Housing White Paper – 'Fixing our broken housing market' (February 2017) identified years of housing under-supply as the one of the causes of the country's broken housing market, stating that one of the main problems leading to a significant under-supply of housing has been the failure of local authorities to plan for the homes they need.
- 4.7 The subsequent Draft NPPF and Draft PPG set out the Government's proposals for a Standard Method to assess local housing need, which includes a market signals uplift to address worsening affordability. The uplift that would be applied in Guildford is equivalent to 40% -

the highest uplift that can be applied – demonstrating the severity of housing affordability in Guildford. Applied to the demographic starting point of 564 hpa (based on a 10-year average rather than the plan period) would result in a need for 789 dpa in Guildford.

- 4.8 Whilst we acknowledge that the Standard Method holds little weight at the current time due its consultation status, it does indicate the Government's intention with regards to local housing need and its approach to addressing affordability issues.
- 4.9 In the context of the affordability uplift alone, we consider a 40% uplift would provide a more positive contribution to addressing the severe housing affordability issues facing Guildford than the Council's proposed 9%.
- 4.11 Therefore in conclusion, we consider that the uplift provided in the SHMA Addendum to improve affordability will not have the desired effect and will in fact result in a worsening of affordability over the plan period. We consider an affordability uplift of 40% to be more appropriate in Guildford which would provide a more positive response to the serious and worsening of housing affordability in Guildford.



## **Appendix 2**

Extracts from GLA Planning Committee response to New London Plan (March 2018)





# LONDON ASSEMBLY

## London Plan consultation response



**Planning Committee**  
March 2018

- 3.16 In November 2017, the Regeneration Committee published its report *Relighting the torch: securing the Olympic legacy*,<sup>7</sup> which looked at progress towards improving the life chances of people living in east London in line with the rest of London, a process referred to as ‘convergence’. The report found that while progress has been made in some areas, more work is needed to achieve convergence. Some of the convergence targets, such as obesity levels, have actually worsened since the Olympic Games. To ensure convergence is achieved, the LLDC needs to provide leadership to support and strengthen the work of boroughs in improving the life chances of those living in east London.
- 3.17 The Regeneration Committee recommended that the Mayor ‘keep the momentum going by ensuring that a commitment to convergence features in his new London Plan.’
- 3.18 Recognising the Olympic Legacy would give legitimacy for the future work at a sub-regional level (such as Growth Borough Partnership and Local London) to achieve convergence, and recognise the work carried out to date. The Mayor should also consider what resource and support can be made available to boroughs to secure the legacy of the Games.

## Policy SD2: Collaboration in the Wider South East

### Recommendations

The Assembly strongly supports the recognition of the need for constructive engagement with the wider south east to manage London’s growth in a regional context.

**Policy SD2 E** should therefore be amended to establish a more formalised arrangement that might provide confidence to authorities outside London that taking some additional growth would be supported by the Mayor in terms of assistance with new infrastructure provision.

- 3.19 While, overall, the London Plan has identified sites for additional housing capacity to meet the housing need for the next 10 -20 years, for a variety of reasons some of this notional capacity may be unrealistic.
- 3.20 Not all of these sites might come forward for development. For example, sites in Inner London may be better allocated for supporting infrastructure; brownfield sites may be unviable without transport infrastructure for which there is no funding; or suburban town centres and sites might deliver insufficient density due to issues of accessibility or damage to existing character.
- 3.21 The Inspectors Report into the current London Plan recommended that the Mayor should engage local planning authorities beyond the GLA’s boundaries

in discussions regarding accommodating sufficient numbers of new homes.<sup>8</sup> This would require a shift in the strategy of managing growth within London's boundaries.

- 3.22 Directing London's growth away from its current boundaries might require a joint strategic plan on a regional level covering London as well as the Home Counties.<sup>9</sup> The Government does not intend to re-impose regional plans<sup>10</sup> but there is a clear expectation, through the Duty to Co-operate as set out in the Localism Act 2011, to ensure that all of the bodies involved in planning work together on issues that are of bigger than local significance.
- 3.23 The Mayor must therefore build the case and convince sceptical authorities outside of London.

### Recommendations – engagement

We would like to see a greater focus on ensuring local people are engaged in planning and during development. As such we would like to see the following wording changed on Policy SD1 A1c: **“support regeneration through genuine engagement with local residents and stakeholders to ensure economic vitality and development of relevant social infrastructure”**.

We would also like to suggest the following addition policy as SD1 B2: **“support local stakeholders to meet local aspirations in Opportunity Areas, including providing guidance and ensuring effective engagement during development”**.

- 3.24 The Regeneration Committee has been consistent in its support for engaging with communities on major regeneration projects. This has been a recurring theme that the committee has heard throughout its investigations, most recently in its 21 November 2017 meeting on town centre regeneration<sup>11</sup> and at an informal roundtable on the OPDC on 17 January 2018. In particular, the committee's meeting on 1 March 2016 on public consultation and its impact on regeneration projects highlighted how a failure to properly consult with people lead to uncertainty for communities and resistance to development proposals at Brent Cross Cricklewood.<sup>12</sup>
- 3.25 By highlighting the importance of community engagement in the London Plan, developers in Opportunity Areas are more likely to consult with local people. This could help improve the quality of proposed developments and improve relations between developers and communities.

## Policy SD6: Town centres



## **Appendix 3**

MGH Housing Delivery Trajectory for Gosden Hill, North East Guildford



## Delivery trajectory for Gosden Hill

### Indicative phasing:

Submission of Outline Planning Application - January 2019

Resolution to Grant (subject to S106) - December 2019

Outline Planning Permission granted (including S106) - Spring 2020

Submission of First Reserved Matters - Summer 2020

Approval of First Reserved Matters - Winter 2020

Commencement of development - Spring 2021

First completions - Late 2022/Early 2023

	2018 / 2019	2019 / 2020	2020 / 2021	2021 / 2022	2022 / 2023	2023 / 2024	2024 / 2025	2025 / 2026	2026 / 2027	2027 / 2028	2028 / 2029	2029 / 2030	2030 / 2031	2031 / 2032	2032 / 2033	2033 / 2034	<b>Total in plan period</b>
<b>GBC Trajectory (April 2018)</b>					50	100	100	100	100	100	100	210	210	210	210	210	<b>1700</b>
<b>MGH Trajectory</b>					50	100	100	150	150	150	200	200	200	200	200	100	<b>1800</b>





## **Appendix 4**

Burntcommon Connector Road Technical Note, prepared by i-Transport (May 2018)



## TECHNICAL NOTE

<b>Project Reference</b>	<b>ITB7161</b>
<b>Project Title:</b>	<b>Gosden Hill, North East Guildford</b>
<b>Document Reference:</b>	<b>JDW/ITB7161-055 EiP Connector Road</b>
<b>Title:</b>	<b>A3(T) Gosden Hill - Burntcommon Connector Road Response to EiP Question 11.11</b>
<b>Date</b>	<b>04 May 2018</b>

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### SECTION 1 INTRODUCTION

#### 1.1 Background

1.1.1 Martin Grant Homes is promoting the residential-led strategic development of land at Gosden Hill, North East Guildford. i-Transport have been appointed to provide highways and transport advice to Martin Grant Homes, in order to progress the transport strategy supporting delivery of the site.

1.1.2 This Technical Note has been prepared to provide additional information on the potential opportunity to retain land within the Gosden Hill site, so as to provide a Connector Road between the proposed Gosden Hill junction of the A3(T) with the B2215 London Road / A247 Clandon Road and a stretched all moves junction which could be created in this location following the delivery of a new northbound on slip and new southbound off slip at Burntcommon, which forms Policy A43(a) of the emerging Local Plan.

### SECTION 2 CONNECTOR ROAD

#### 2.1 Policy

2.1.1 The transport infrastructure required to support development at Gosden Hill is defined in Policy A25 of Guildford Borough Council's 'Submission Local Plan: Strategy and Sites (2017)' (LP).

2.1.2 Policy A25 (2) of the LP requires the following:

**Any proposals for the development of the site should have regard to the potential opportunity to provide an all movements junction of the A3 trunk road with the A3100 London Road, the B2215 London Road and the A247 Clandon Road. Land could potentially be required for the provision of a connector road to the B2215 London Road/A247 Clandon Road**

## 2.2 Evidence Base

- 2.2.1 As part of the evidence base supporting the Local Plan, extensive traffic modelling has been undertaken by Surrey County Council (SCC) on behalf of Guildford Borough Council (GBC). The basis for the Local plan is the Guildford Borough Proposed Submission Local Plan Strategic Highway Assessment, which is a strategic transport modelling study, which has assisted with the decision making surrounding the suitability of potential development sites and future highway mitigation proposals which have been identified. The future highway mitigation proposals were identified by GBC working with SCC, and relevant stakeholders. The modelling assessment made use of SCC's strategic transport model, SINTRAM.
- 2.2.2 The strategic highway assessment represents a robust "worst case" scenario in terms of transport demand and supply assumptions as it does not assess and, therefore, does not account for all mitigation, including the potential for modal shift encouraged by the new and improved sustainable transport choices provided by the rail, bus and active modes schemes included in the Proposed Submission Local Plan, and the possible increased internalisation of trips within the larger sites.
- 2.2.3 This modelling, which does include the amended A3 slips at Gosden Hill and the new northbound on and southbound off slip at Burnt common does not include mitigation in the form of a link between the A3/A3100 Burpham junction (SRN4) and the B2215 London Road, in combination with the new A3 northbound on-slip (SRN9) and the new A3 southbound off-slip (SRN10).

## 2.3 Improved A3 Junction

- 2.3.1 The new A3 southbound facing slips which are to be provided by Gosden Hill are included within the strategic modelling undertaken by SCC (*ref: GBC Proposed submission local plan 'June 2016' Strategic Highway Assessment Report*), which identified that the quantum and distribution of development tested within the model to support the Submission Local Plan together with the key highway schemes, will not lead to severe impacts on the local and strategic highway network.

2.3.2 As set out in the Strategic Highway Assessment Report (at paragraph 4.11.4) not only does the A3(T) southbound slip allow trips from the Gosden Hill Farm site to join the A3(T) at this point, but it also permits other users to re-route and join the A3 at this location instead of driving through Guildford and joining the southbound A3 at the Dennis junction.

2.3.3 It is evident from the strategic modelling which supports the Local Plan, that the infrastructure proposed by Gosden Hill meets the needs of the development, whilst providing a strategic benefit to the operation of both the local and strategic highway (*ref: para 4.7.6 of the June 2016 Strategic Highway Assessment Report*).

## 2.4 Opportunity Land

2.4.1 The Strategic Traffic Modelling undertaken to support the Submission Local Plan concludes that that the quantum and distribution of development proposed together with the key highway schemes, will not lead to severe impacts on the local and strategic highway network.

2.4.2 The modelling does not therefore identify the need for either a dedicated all moves junction at Gosden Hill or a vehicular link between Gosden Hill and a stretched all moves junction at Burntcommon.

2.4.3 Based on the County's modelling, it is evident that a new southbound facing Junction on the A3 will meet the needs of the Gosden Hill development and that the delivery of a Connector Road between the proposed A3(T) Gosden Hill junction and the stretched all moves junction at Burntcommon / Send is not necessary for either the delivery of Gosden Hill, or the Submission Local Plan.

2.4.4 Surrey County Council as Highway Authority have confirmed that there is no 'need' to deliver this aspirational Connector Road in relation to Gosden Hill, or to deliver the submission Local Plan.

2.4.5 As such, the requirement for the Gosden Hill masterplan to have regard for the potential opportunity to provide a Connector Road between the proposed A3(T) Gosden Hill junction and the stretched all moves junction at Burntcommon / Send is merely to meet an aspiration of GBC, which is not soundly founded by any evidence.

2.4.6 Furthermore, while land within the Gosden Hill site could be set aside for a Connector route, no land has been identified or safeguarded within the Local Plan between the eastern boundary of the Gosden Hill site and proposed stretched all moves junction Burntcommon / Send to facilitate any such link.

2.4.7 The wording relating to Policy A25 Infrastructure (2) should be removed entirely from the Policy wording, as this is linked to an aspirational scheme which does not form part of the Local Plan.

2.4.8 Failing this, the wording should be amended and provided outside of the Policy requirements, i.e. under 'Opportunities' as an aspiration rather than a requirement, as set out below;

- At the time of a planning permission being sought for the Gosden Hill site, consideration should be given to identifying a suitable route (with a vehicular carriageway width of no more than 6.75m) to provide a Connector Road between the A3(T) Gosden Hill junction and the eastern boundary of the site in a location which allows a future connection to the the B2215 London Road and / or A247 Clandon Road to be considered.
- Whilst not a specific requirement of the Gosden Hill development or this Local Plan, this safeguarding of land would allow the delivery of a Connector Road eastwards to an aspirational improvement scheme sited outside of the Gosden Hill allocation.

## 2.5 **Emerging Masterplan**

2.5.1 Notwithstanding this, it should be noted that in line with the emerging Policy A25, the Gosden Hill site has been masterplanned to accommodate a network of roads and streets which can facilitate both the movements associated with Gosden Hill and the potential opportunity to provide a road / or set aside land to the boundary of the Gosden Hill site which could form a Connector Road to the B2215 London Road/A247 Clandon Road.

- 2.5.2 This would allow for a road with a suitable width to be provided within the site, providing a route from the primary access and its associated road, eastwards toward the edge of the site boundary. A suitable corridor width can be set aside to accommodate the necessary road hierarchy to provide for Gosden Hill in the immediate future and as a road connection post this plan period. Securing the ability to provide any such connection would enable GBC to explore the potential for a stretched all movements junction at a future time, unrelated to the Gosden Hill development.
- 2.5.3 Therefore, while this aspirational Connector Road between the A3 / A3100 junction and the B2215 London Road/A247 Clandon Road is not necessary to deliver development at Gosden Hill or the Local Plan, it can be designed into the current master plan road layout, without serious harm to the proposal.

### **SECTION 3 SUMMARY AND CONCLUSION**

#### **3.1 Summary**

- 3.1.1 Martin Grant Homes is promoting the residential-led strategic development of land at Gosden Hill, North East Guildford. A comprehensive sustainable access strategy has been identified for the site including the provision of an improved A39T) access, Park and Ride facility and contribution to Merrow Rail Station.
- 3.1.2 This Technical Note has been prepared to provide additional information on the potential opportunity to retain land within the Gosden Hill site, so as to provide a Connector Road between the proposed Gosden Hill junction of the A3(T) with the B2215 London Road / A247 Clandon Road and a stretched all moves junction which could be created in this location following the delivery of a new northbound on slip and new southbound off slip at Burntcommon, which forms Policy xx of the emerging Local Plan.
- 3.1.3 The strategic modelling which supports the Local Plan identifies that the infrastructure proposed by Gosden Hill meets the needs of the development, whilst providing a strategic benefit to the operation of both the local and strategic highway.
- 3.1.4 The strategic modelling has not identified the need for a Connector Road between the proposed A3(T) Gosden Hill junction and the stretched all moves junction at Burntcommon / Send, to deliver either Gosden Hill or the Submission Local Plan.

### 3.2 **Conclusion**

- 3.2.1 The requirement for the Gosden Hill masterplan to have regard for the potential opportunity to provide a Connector Road between the proposed A3(T) Gosden Hill junction and the stretched all moves junction at Burntcommon / Send is therefore not founded by any evidence and is merely to meet an aspiration of GBC.
- 3.2.2 The wording relating to Policy A25 Infrastructure (2) should be removed entirely from the Policy wording, as this is linked to an aspirational scheme which does not form part of the Local Plan.
- 3.2.3 Failing this, at the very least, the wording should be amended and provided outside of the Policy requirements, i.e. under 'Opportunities' as an aspiration rather than a requirement.



## **Appendix 5**

North East Guildford Park and Ride Technical Note, prepared by i-Transport (May 2018)



## TECHNICAL NOTE

<b>Project Reference</b>	<b>ITB7161</b>
<b>Project Title:</b>	<b>Gosden Hill, North East Guildford</b>
<b>Document Reference:</b>	<b>JDW/ITB7161-054 EiP P&amp;R Note</b>
<b>Title:</b>	<b>Park and Ride – Response to EiP Question 11.11</b>
<b>Date</b>	<b>04 May 2018</b>

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### SECTION 1 INTRODUCTION

- 1.1 Martin Grant Homes is promoting the residential-led strategic development of land at Gosden Hill, North East Guildford. i-Transport have been appointed to provide highways and transport advice to Martin Grant Homes, in order to progress the transport strategy supporting delivery of the site.
- 1.2 This Technical Note has been prepared to provide additional information on the delivery of the Park and Ride which is proposed on the Gosden Hill Site.
- 1.3 The remainder of this Statement is structured as follows:
- Section 2 – Park and Ride policy, demand and operation;
  - Section 3 – Summary and Conclusions.

### SECTION 2 PARK AND RIDE

- 2.1 **Policy**
- 2.1.1 The transport infrastructure required to support development at Gosden Hill is defined in Policy A25 of Guildford Borough Council's 'Submission Local Plan: Strategy and Sites (2017)' (LP).
- 2.1.2 Policy A25 of the LP requires the following:
- (3) Land and park and ride facility of a sufficient scale as required by projected demand and in order to operate without public subsidy in perpetuity.**
- 2.1.3 The Park and Ride is also identified as P&R1 in the Guildford Borough Transport Strategy (December 2017) (GBTS)

## 2.2 Park and Ride

2.2.1 Park and Ride sites already operate across Guildford, and as such already form part of the Borough's approach to a managed transport system. Park and Ride offers many benefits including:

- Reducing congestion;
- Reducing pollution;
- Maintaining or increasing the number of economically desirable trips into the employment / retail centre; and
- Avoiding the need to use valuable town centre land for car parks and access roads.

2.2.2 The delivery of a Park and Ride therefore provides many potential benefits to Guildford, albeit its success will be significantly influenced by a multitude of factors which will be determined by policies adopted by Guildford Borough Council and Surrey County Council as highway authority. This will include wider car park charging strategies, and especially Town Centre parking provision and costs. Reducing the supply of Town Centre parking, and / or increasing parking costs will have a direct impact on the ticket price and level of demand associated with the operation of the Park and Ride.

2.2.3 The Boroughs Park and Ride strategy must therefore be considered in the whole, as part of the overarching strategy for the Borough to ensure its profitability going forward.

## 2.3 Gosden Hill

2.3.1 The proposed Park and Ride has been identified on the emerging master plan to be situated to the north of the site, adjacent to the A3(T). A Park & Ride situated at this location on the Gosden Hill development offers the potential to intercept trips into the centre of Guildford from the A3(T) corridor to the north-east of Guildford.

2.3.2 Initial work on a Business Case has been progressed by i-Transport, with the support of SCC, to identify the scale of the Park and Ride infrastructure required to enable operation without public subsidy. It is agreed that this work will continue alongside the production of a full TA to accompany a future planning application.

2.3.3 Surrey County Council has provided background information to assist in the development of a preliminary business case, including the cost of the buses used operating Park and Ride facilities in Guildford and the annual maintenance cost of operating the Park and Ride site. This information has been used to inform the assessment set out in the following section of the report.

## 2.4 **Location**

2.4.1 Given its proximity to the A3(T) a Park and Ride site would be clearly visible when approaching Guildford in a southbound direction. The site provides a viable and convenient alternative to driving into the Town Centre road network in order to access central car parks, with the location of the Park and Ride requiring minimal diversion to southbound journeys.

## 2.5 **Park and Ride Bus Route**

2.5.1 A number of routes to and from the proposed Gosden Hill Park and Ride have been considered, including routes via the A3(T), Merrow Lane and New Inn Lane. Average journey times have been obtained for the existing Ladymead and Merrow Park and Ride operations and establishes that the buses travel at an average speed of 12.5mph along the respective routes. This speed has been applied to the distances associated with each route to obtain the journey time.

2.5.2 A route via the A3100 would provide the quickest journey time at a total of 28 minutes per round trip and the most direct route.

2.5.3 An alternative to the route identified is the use of the A3100 and A25, a route which benefits from existing bus infrastructure. The route is of similar length but does suffer from peak period congestion at the Ladymead junction, thus impacting on route resilience during peak network conditions. There are, however, plans to improve the operation of this junction. The use of this route would not have a material bearing on the findings of the work undertaken to date and as such it would be for the end operator of the site to determine their preferred routing option.

2.5.4 The A3100 has been identified for improvements to create a ‘Sustainable Movement Corridor’, which would include bus priority improvements and bus lanes. This provision has not been accounted for in the journey time assessment, to ensure that the feasibility of the Park and Ride is not dependent on the implementation of the bus priority corridor. The existing corridor conditions have been used to inform the assessment.

## 2.6 **Headway**

2.6.1 Average journey times have been obtained for Ladymead and Merrow Park and Ride operations. This information establishes that the buses travel at an average speed of 12.5mph along the respective routes. Applying the average speed to the proposed A3100 route, which has a total distance of 6.03 miles, equates to round trip journey time of 28.4 minutes.

2.6.2 To provide a 15-minute headway it will be necessary to operate 3 buses. This will provide a layover time of 16.6 minutes, thus providing an adequate buffer to accommodate any extraordinary delay on route.

2.6.3 Alternatively, the operation of 3 buses could provide a headway of as low as 12 minutes but would reduce the layover time to 6.9 minutes. This reduces the margin for error in keeping to the scheduled service time in the event that abnormal delay is encountered. However, the introduction of a bus priority corridor along the A3100 would increase the resilience of the service and could act as a trigger point for increasing service frequency to 12 minutes.

## 2.7 **Operating Cost**

2.7.1 The assessment assumes that there are 254 working days (excluding bank holidays) upon which the Park and Ride would operate at its optimum capacity, i.e. providing for commuters. In addition, there would be a further 52 days (i.e. Saturdays) when the P&R may operate at a lower capacity (i.e. catering for retail and leisure trips). It has been assumed that there would either be no service on a Sunday and bank holidays, or that any revenue would be de-minimis and, as such, has not been accounted for in the financial forecasts.

2.7.2 Vehicle and running costs, as advised by Surrey County Council, are generally between £120,000 and £180,000 per vehicle per annum. The figure of £150,000, plus 3% inflation per vehicle per annum has been assumed for these estimates. As advised by SCC a further £100,000 per annum has been allowed for maintenance running costs associated with the Park and Ride site.

2.7.3 The typical operating costs have therefore been identified and are summarised in Table 2.1. For robustness, the operating cost has been calculated for a weekday rather than across the week.

**Table 2.1: Typical Operating Costs**

Number of Buses per Day	Cost Per Annum	Cost per day (254 Days)
Three	£550,000	£2,165.35

Source: Surrey County Council and Consultants calculations

## 2.8 Operating Revenue

2.8.1 To establish the revenue profile of the proposed Gosden Hill Park and Ride, ticket prices at other Park and Ride facilities in Guildford, Oxford and Wokingham/Reading have been reviewed.

2.8.2 Using these ticket prices, the typical revenue both per annum and per day can be calculated based on the number of spaces. A range of scenarios have been considered in terms of future ticket prices, car park occupancy and the average car occupancy.

2.8.3 The study has identified that a 750 space Park and Ride operating at 80% occupation during weekdays and 10% on Saturdays, with an average car occupancy of 1.5 persons per vehicle, and ticket prices similar to those already in place would be capable of making a reasonable yearly profit without the need for additional subsidy. On these same assumptions, a car park with some 700 spaces would be borderline profitable.

2.8.4 The minimum number of spaces which is considered necessary for the Park and Ride to operate without subsidy is circa 500 spaces, albeit this would require ticket prices to higher, but in line with operations at Wokingham and Reading.

2.8.5 Furthermore, the initial assessment indicates that there is scope to refine the charging schedule in Guildford in order to bring it in line with charges at P&R facilities at other urban locations.

## 2.9 Localised Impacts

2.9.1 This strategy would make the P&R profitable and remove some 180-260 peak hour trips from the A3/A3100, depending on the number of spaces occupied and arrival and departure profiles. The reduction in demand placed upon the A3100 corridor would again enhance conditions for the introduction of a Sustainable Movement Corridor and assist in alleviating traffic demand placed upon the corridor from traffic growth associated with planned growth across the Borough and the wider area.

## 2.10 Opportunities

2.10.1 Whilst the Park and Ride site is to be provided by the Developer, the facility will be handed over to and operated by the relevant Local Authority. As revenue generating infrastructure, if managed appropriately by the end user, it has the potential to generate a profitable and reliable stream of income. The profitability of the facility is heavily dependent on complementary ‘supply and demand’ traffic management measures, such as town centre car parking charges.

2.10.2 In addition, the location of the Park and Ride provides the opportunity for consideration to be given to the relocation/closure of the existing Guildford Spectrum Park and Ride facility. The P&R provision at Gosden Hill is ideally located to intercept journeys travelling along the same corridor at an earlier point and would offer a greater capacity.

2.10.3 Closure of the Guildford Spectrum Park and Ride would present a commercial opportunity, enabling the site to be used for the provision of an alternative service, or enabling disposal of the land for development opportunity. Any revenue generated from this could be invested into further sustainable transport initiatives or used towards the delivery of the GBTS.

2.10.4 The extension of the route would provide a greater customer base for the services, increasing patronage and protecting the long-term financial viability of the routes.



- 2.10.5 The introduction of the Sustainable Movement Corridor will provide bus priority measures, further enhancing the service reliability and provide comparative journey time savings during peak hour conditions.
- 2.10.6 Should the opportunity of a Strategic Link Road with a southern access into the Gosden Hill site be realised, the options for bus connectivity and alternative routing of the Park and Ride Services would be greatly enhanced. The opportunity would exist for a north/south route through the site and onwards towards Burpham and Mellow, enhancing connectivity in these areas, as well as the opportunity to use the A25 corridor for movements into Guildford. In this regard it is noteworthy that GBC have previously identified opportunities to provide bus priority along this corridor.

### **SECTION 3 SUMMARY**

- 3.1 Martin Grant Homes is promoting the residential-led strategic development of land at Gosden Hill, North East Guildford. A comprehensive sustainable access strategy has been identified for the site including the provision of a Park and Ride facility to the north of the site.
- 3.2 Policy A25 of the Local Plan requires that the Gosden Hill site brings forward land and a Park and Ride facility of a sufficient scale as required by projected demand and in order to operate without public subsidy.
- 3.2.1 The initial assessment, which has been informed in part by information provided by SCC has identified that a Park and Ride site of some 500 to 750 spaces would be capable of operating profitably, and thus not require public subsidy
- 3.2.2 This quantum of parking has been identified and included within the emerging master plan for the site, and as such can be accommodated within the Gosden Hill emerging allocation.
- 3.2.3 This could remove some 180-260 peak hour trips from the A3/A3100, depending on the number of spaces occupied and arrival and departure profiles. The reduction in demand placed upon the A3100 corridor would enhance conditions for the introduction of a Sustainable Movement Corridor and assist in alleviating traffic demand placed upon the corridor from traffic growth associated with planned growth across the Borough and the wider area.



## **Appendix 6**

Modifications to Policy A25 proposed by MGH



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

Allocation	<p>This is a residential led mixed use development, allocated for:</p> <ol style="list-style-type: none"><li>(1) <del>Approximately 2,000</del> <b>Up to 1,800</b> homes <del>of which a minimum of 1,700 homes</del> (C3) will be delivered within the plan period, including some specialist housing and self-build plots and</li><li>(2) <del>8</del> <b>6</b> Gypsy and Traveller pitches <b><u>in accordance with Policy H1</u></b> and</li><li>(3) Approximately 10,000 sq m of employment floorspace (B1a/b) and</li><li>(4) Approximately 500 sq m of comparison retail (A1) in a new Local Centre and</li><li>(5) Approximately 600 sq m of convenience retail (A1) in a new Local Centre and</li><li>(6) Approximately 550 sq m services in a new Local Centre (A2 –A5) and</li><li>(7) Approximately 500 sq m of community uses in a new Local Centre (D1) and</li><li>(8) A primary school (D1) (two form entry) and</li><li>(9) A secondary school (D1) (four form entry, of which two forms are needed for the housing on the site, and the remainder for the wider area)</li></ol>
Requirements	<p><u>Infrastructure</u></p> <ol style="list-style-type: none"><li>(1) An improved junction on the A3 comprising the relocated A3 southbound off-slip, a new A3 southbound on-slip and connection via a new roundabout to the A3100, with associated infrastructure on the A3100 corridor within Burpham</li><li>(2) <del>Any proposals for the development of the site should have regard to the potential opportunity to provide an all movements junction of the A3 trunk road with the A3100 London Road, the B2215 London Road and the A247 Clandon Road. Land could potentially be required for the provision of a connector road to the B2215 London Road/A247 Clandon Road</del></li><li>(3) Land and park and ride facility of a sufficient scale as required by projected demand and in order to operate without public subsidy in perpetuity</li><li>(4) Developer to provide the eastern route section of the Sustainable Movement Corridor on the site and make a necessary and proportionate contribution to delivering the eastern route section on the Local Road Network, both having regard to the Sustainable Movement Corridor Supplementary Planning Document</li><li>(5) A significant bus network to serve the site and key destinations including the existing eastern suburbs of Guildford and the town centre</li><li>(6) Provide permeability for pedestrians and cyclists into and from the development, especially from the urban area of Guildford</li><li>(7) Land and necessary and proportionate contribution <b><u>towards the delivering of</u></b> Guildford East (Merrow) railway station working with Network Rail and Surrey County Council as the land owner to the south of the railway line</li><li>(8) Interventions will be required which address the potential highway performance issues which could otherwise result from the development. The Infrastructure Schedule in the latest Infrastructure Delivery Plan identifies the locations on the Local Highway Network and the Strategic Highway Network which could be expected to experience the most significant potential highway performance issues, in the absence of mitigating interventions</li></ol>

(9) When determining planning application(s), and attaching appropriate conditions and obligations to planning permission(s), regard will be had to the delivery and timing of delivery of the key infrastructure requirements on which the delivery of the plan depends, set out in the Infrastructure Schedule in the latest Infrastructure Delivery Plan, or otherwise alternative interventions which provide comparable mitigation

(10) Other supporting infrastructure must be provided on the site, including a local retail centre including a GPs surgery and community building; early years provision; open space (not associated with education provision) including playgrounds and allotments; and a two-form entry primary school to serve the development

(11) Secondary educational need will be re-assessed at the time a planning application is determined at which time any recent new secondary school provision will be taken into account. The associated off site playing fields must be dual use and secured through the planning application process

(12) Bespoke SANG to mitigate impacts on the SPA (See the IDP for further information)

(13) Green corridors and linkages to habitats outside of the site, and the adjoining SNCI

(14) Reduce surface water flood risk through appropriate mitigation

#### Traveller pitches (public)

~~(15) The pitches will be public (tenure) forming part of the affordable housing contribution (1 pitch equates to 1 affordable home)~~

~~(16) Once completed, the pitches will be provided to the registered provider at nil cost, for the Local Authority to allocate the occupancy and manage~~

~~(17) Traveller pitches should reflect modern Traveller lifestyles. They should be serviced pitches, providing hard standing, garden and connections for drainage, electricity and water. Service meters should be provided. Utility blocks are not required~~

~~(18) Traveller pitches should not be isolated, and should be reasonably integrated with other residential development, with services and facilities accessible, helping to create sustainable, mixed and inclusive communities for all~~

~~(19) The pitches should not be enclosed with hard landscaping, high walls or fences, to an extent that suggests deliberate isolation from the community~~

~~(20) Within the area set aside to provide pitches, bricks and mortar housing, or any buildings capable of being converted to bricks and mortar housing, is not appropriate and will be resisted~~

~~(21) Delivery to be phased alongside delivery of new homes (C3), with two Traveller pitches completed per 500 homes (C3) completed~~

#### Other issues

(22) The employment floorspace (B1a/b) to be split over two parts of the site. When developed the new employment area on the north side of the site is expected to deliver a new HQ building of around 7,000 sq m and will be treated as an Office and Research & Development Strategic Employment Site. Employment on the remainder of the site is likely to be delivered as part of the new local centre

(23) Sensitive design at site boundaries that has significant regard to the transition from urban to greenfield

	<p>(24) In order to ensure that sufficient separation is maintained between the site and Send Marsh, part of the site adjacent to the A3, will need to remain open as a green buffer</p>
Opportunities	<p>(1) Create unique places that combine the highest standards of good urban design with well designed streets and spaces</p> <p>(2) Incorporate high quality architecture that responds to the unique context of the site</p> <p>(3) Potential to provide a through route within the site to divert the B2234 to form a more direct link to the A3 at the improved junction</p> <p>(4) Create a sustainable urban extension with bus, cycle and pedestrian links into the adjoining urban area, and the town centre</p>





## **Appendix 7**

Response to Issues 11.13 and 11.14, prepared by SLR Consulting (May 2018)



# GOSDEN HILL

**Response to Inspector's Matters and Issues  
Matter 11: A25 Gosden Hill Farm, Mellow,  
Guildford**

Prepared for: Martin Grant Homes

SLR Ref: 416.04650.00003  
Version first draft  
May 2018



## BASIS OF REPORT

This document has been prepared by SLR Consulting Limited with reasonable skill, care and diligence, and taking account of the manpower, timescales and resources devoted to it by agreement with Martin Grant Homes (the Client) as part or all of the services it has been appointed by the Client to carry out. It is subject to the terms and conditions of that appointment.

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## CONTENTS

<b>1.0</b>	<b>RESPONSE TO INSPECTOR'S QUESTIONS .....</b>	<b>1</b>
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## 1.0 Response to Inspector's Questions

1.1 This response landscape and Green Belt issues relates to Site A25 Gosden Hill. It is given in response to the Inspector's queries on Matter 9 Green Belt, with reference to Matter 11 Site Allocations.

1.2 The following plans are attached:

Figure 1: Topography and Woodland Boundaries

Figure 2: Landscape Constraints and Opportunities

Figure 3: Landscape setting of the A3 Corridor

### Question 11.13

#### *The Inspector's Question*

1.3 The Inspector has questioned at 11.13:

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

### Response to Question 11.13

1.4 Figure 1 illustrates the strong boundaries created by the landform, strongly reinforced by the woodland of Cotts Wood. Together they create a strong and enduring eastern boundary to development on the site, and a clear visual entry to Guildford. Gosden Hill is enclosed, physically and visually, and in terms of character, as set out below.

1.5 **Physically**, Gosden Hill is enclosed by landscape boundaries as follows:

- to the north west, the A3 and, beyond that, the woodland of Sutton Place;
- to the east, the partly ancient woodland of Cotts Wood, a strong edge to the expanded settlement;
- to the west, the urban area, its Common and woodland;
- to the south, the railway line.

Each of these boundaries perform to the requirements of the NPPF Paragraph 85, being physically enduring and visible on the ground.

1.6 **Visually**, each of the physical boundaries set out above are also strong in visual terms. They are simple, understandable and well defined, they are boundaries that will endure. This simple character is shown by Photographs 1 and 2 taken from the hard shoulder of the A3 and Photograph 3, within the site. The A3, a major highway, is very strongly defined on the ground and is a clear visual boundary, even though not always screened by woodland.

1.7 In terms of **landscape character**, the site has a coherent character of grassland enclosed by woodland and hedgerows. A break of slope across the central part of the site separates the northern part which is visible for the A3, and that to the south, which is visually enclosed and associated with the railway.

1.8 The above demonstrates 'local level exceptional circumstances'. In landscape and green belt terms it is appropriate to justify a release from the Green Belt because:

- The site is visually and physically defined, and possesses a single coherent landscape character, a simple parcel to be removed from the Green Belt;
- development will provide appropriate benefits in terms of generous open space and SANG; these providing recreation uses within the Green Belt; and
- Development would visually define the entry and the exit from Guildford and provide a clear and understandable Green Belt boundary.

1.9 Figure 2 shows the resultant Green Belt boundaries. These will be robust and based on the enduring physical boundaries of the landform; the railway line; the A3; and reinforced woodland along the northern edge.

1.10 In their written response the Council (8.76) state that:

*'... The release of Gosden Hill would have limited impact of the 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.'*

#### Question 11.14

##### *The Inspectors Question*

1.11 The Inspector asks at paragraph 11.14:

*'in combination with the allocations near the A3 at Sand (site 11.34) is there a risk of a significant diminution of the Green Belt in the locality? Can the perception of the eastward sprawl of the A3, and the encroachment into the undeveloped gaps, be avoided?'*

##### *Response to paragraph 11.14*

1.12 The A3 corridor is shown on Figure 3, this wider plan showing both Gosden Hill and Send allocations.

1.13 The allocation at Send is dissimilar to that at Gosden Hill, being employment land located on a former industrial site. Send is well wooded with buildings only partly visible. This wooded character would create a development that would be perceived as part of a wider, partly settled landscape, rather than the edge of Guildford.

1.14 The Council have already considered the Gosden Hill site. In their written response to the Inspector's initial questions at paragraph 8.74 the Council state with respect to the northern most tip of Gosden Hill:

*'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’.*

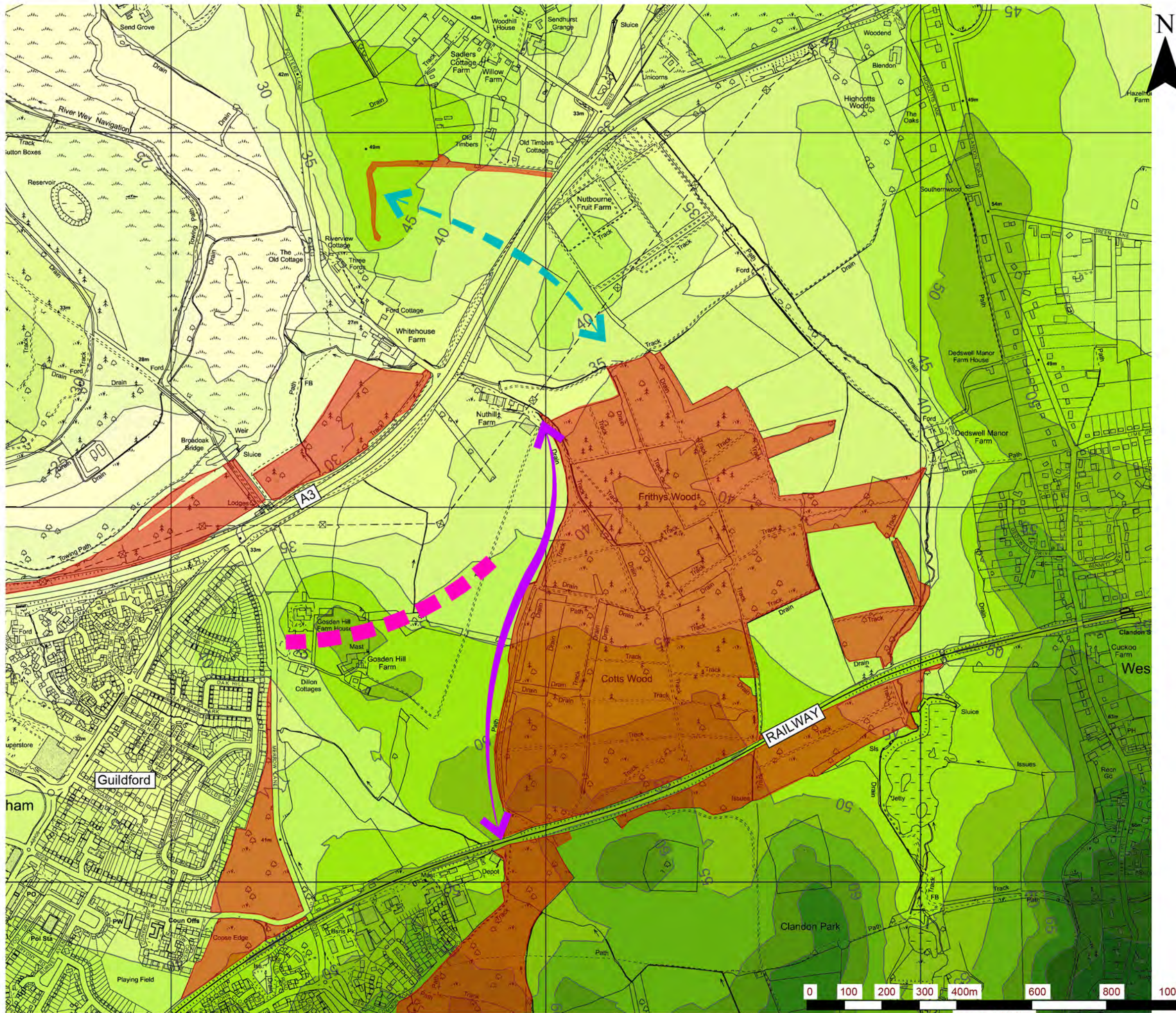
1.15 The Council go on to say at Paragraph 8.93 that:

*‘...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.’*

1.16 With strong and clear design which accords with the character of the area, the Send and Gosden Hill allocations would not result in perceived sprawl or coalescence. This is shown below by reference to the key Green Belt purposes in NPPF Paragraph 80, accepting that there are no issues relating to historic towns or regeneration.

<b>Green Belt Purpose</b>	<b>Comment</b>	<b>Conclusion</b>
Unrestricted sprawl along the A3	Gosden Hill and Send are different in character and separated by 0.6-1km of wooded countryside	No sprawl would be perceived in this settled landscape
Prevention of merging of settlements	Gosden Hill lies adjacent to the urban area. Development would act as an extension of the urban area within strong boundaries. No other settlements would be affected.	There would be no merging of settlements
Safeguarding the Countryside	A35 is strongly defined by robust physical and visual boundaries	There would be no harm to the countryside beyond the site.





**LEGEND**

**HEIGHT IN M AOD**

- 25M AND BELOW
- 25 - 30M
- 30 - 35M
- 35 - 40M
- 40 - 45M
- 45 - 50M
- 50 - 55M
- 55 - 60M
- 60 - 65M
- 65 - 70M
- 70 - 75M
- 75 - 80M
- 80 - 85M
- 85M AND ABOVE

- WOODLAND
- VISUAL ENCLOSED BY RISING LAND
- STRONG BOUNDARY CREATED BY WOODLAND
- BREAK OF SLOPE WITHIN SITE

**FIGURE 1**

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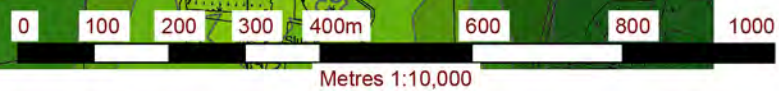
MARTIN GRANT HOMES

GOSDEN HILL, GUILDFORD

**GREEN BELT ASSESSMENT:  
TOPOGRAPHY AND  
WOODLAND BOUNDARIES**

**416.04650.00003.29.102.1**

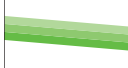




Scale: 1:10,000@A3      Date: MAY 2018



416.04650.00003.29.102.1-GREEN BELT ASSESSMENT-TOPOGRAPHY-FIG 1.dwg



**LEGEND**

-  EXISTING GREEN BELT BOUNDARY (NOTE 1)
-  BUILT DEVELOPMENT
-  EXISTING MATURE WOODLAND AND TREES
-  PROPOSED GREEN BELT BOUNDARY
-  PROPOSED STRUCTURAL TREE PLANTING

NOTES:  
1) TAKEN FROM GIS.

**FIGURE 2**

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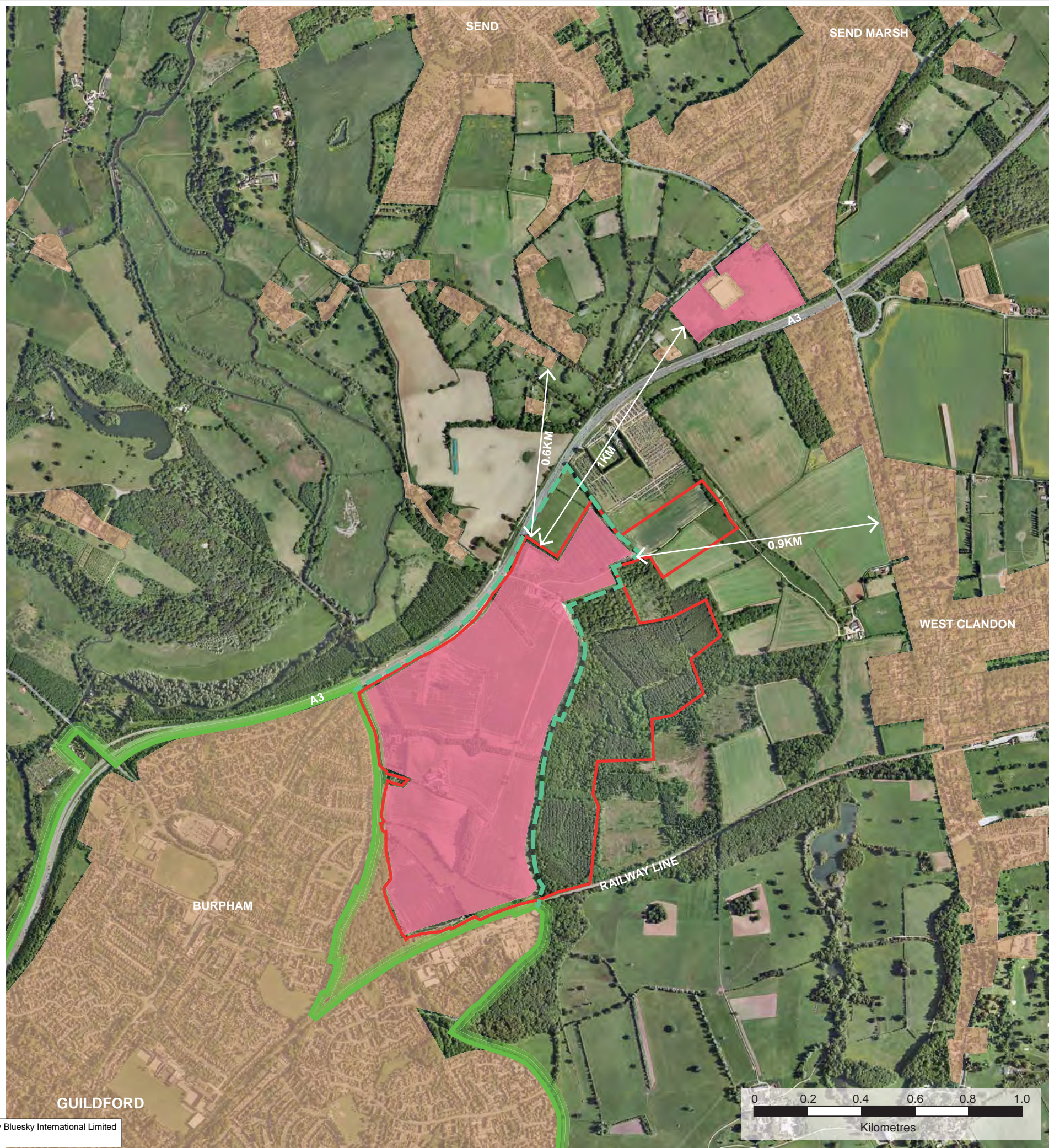
**INSPECTOR'S QUERY 1: LANDSCAPE CONSTRAINTS AND OPPORTUNITIES**

**416.04650.00003.29.100.2**

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416.04650.00003.29.100-GREEN BELT ASSESSMENT

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- LEGEND**
- SITE BOUNDARY
  - EXISTING GREEN BELT BOUNDARY (NOTE 1)
  - BUILT DEVELOPMENT
  - ALLOCATED SITE
  - PROPOSED GREEN BELT BOUNDARY

NOTES:  
1) TAKEN FROM GIS.

**FIGURE 3**

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**INSPECTOR'S QUERY 2: LANDSCAPE SETTING OF A3 CORRIDOR**

**416.04650.00003.29.101.2**

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