

Guildford Borough Local Plan: Strategy and Sites (2017)

Dandara Ltd Hearing Statement (Respondent ID: 12062017)

Introduction

This Hearing Statement has been prepared by Dandara Ltd who are promoting, for residential development, land off Shere Road in West Horsley which is not proposed for allocation in the draft Plan. The Statement concisely addresses the 'Matters and Issues for Examination' (ID/3) and should be read alongside representations made by Dandara Ltd to the two iterations of the Proposed Submission draft Local Plan in 2016 and 2017.

M&I 1.1 – Adequacy of Sustainability Appraisal

- 1.1 Whilst the 2017 SA does not explicitly consider the impact of the stepped housing target proposed by Policy S2 on short to medium term housing delivery in a Borough that has already accumulated a - 1,281 deficit over the first four years of the Plan (LAA, pg.2), para. 10.9.5 does recognise that "... *there remains some risk of a dip in the housing trajectory in the early part of the Plan period, given a reliance on strategic sites*" whilst para. 10.9.14 summarises that "*there is also some uncertainty regarding the housing trajectory, and specifically the supply of housing in the early part of the Plan period*".
- 1.2 Section 6.7 of the SA establishes eight spatial strategy alternatives which deliver housing numbers at varying levels above the Council's defined OAHN (from + 9.4% to + 26.2%). However, the SA fails to consider spatial strategy alternatives which could boost short to medium term housing supply given that this is an identified deficiency within the Plan as explicitly recognised in paras. 10.9.5 and 10.9.14. The SA fails to assist the Plan with satisfying the 'justified' test of soundness by not considering spatial strategy alternatives capable of introducing a higher proportion of small and medium scale sites into the Plan to boost housing delivery within the early Plan period.
- 1.3 One source of additional early housing supply comprises "*reasonable village Green Belt site options are those identified in the Green Belt and Countryside Study (GBCS) and listed in the LAA as either A) 'a realistic candidate for development' (Appendix B); or B) a 'discounted site' (Appendix E)*" (SA Box 6.10). Box 6.10 states that "*on this basis, there are 31 reasonable options*", being those Green Belt site options around villages which were identified as potential development areas (PDAs) within the GBCS.
- 1.4 The SA does not assess the majority of these 31 'reasonable options', which could assist with boosting OAHN and increasing supply during the early part of the Plan period. This is because no less than 22 of the 31, despite "*... having been identified as PDAs through the GBCS, are ruled-out, i.e. it is a 'given', for the purposes of developing spatial strategy alternatives, that they should not be allocated*". The justification for it being a 'given' that they are ruled-out is that these sites fall within Appendix E of the 2017 Land Availability Assessment (LAA) as '*Green Belt discounted sites (housing)*'.
- 1.5 Taking land off Shere Road in West Horsley as an example, despite the site being identified as a PDA within the GBCS, Appendix E of the LAA concludes "*our spatial strategy and site allocations have been considered through the Sustainability Appraisal and this site no longer*

accords with the proposed spatial strategy in the Local Plan. The site was identified in the GBCS but is located within high sensitivity Green Belt.” (site ID 2175).

- 1.6 The first reason for discounting is fundamental to the SA assessment process as the LAA is effectively saying that because PDAs have not been considered as part of SA option testing, under either the preferred spatial strategy or reasonable alternatives, that this should be used as a reason to discount under the LAA. This represents a fundamentally flawed assessment methodology and logic as:
- (1) Land off Shere Road is not only identified as a PDA within the GBCS but is also contiguous with the settlement boundary of West Horsley as an ‘inset village’ which para. 4.1.6 of the Plan considers to be one of four ‘most sustainable locations’. The premise that the site does not accord with the proposed spatial strategy in the Local Plan is fundamentally incorrect as West Horsley as a settlement is proposed to accommodate new homes, including on Green Belt land;
 - (2) This approach is unsound by failing to consider no less than 22 sites identified as PDAs because these were discounted within the LAA. Cyclically, the LAA justifies their exclusion because such sites do not accord with the preferred spatial strategy considered within the SA. Using this rationale, it is impossible for such PDAs to be properly considered through the evidence base as they are automatically being excluded from the SA due to their rejection within the LAA for the very reason that they don’t accord with the SA spatial strategy – a spatial strategy that they cannot be considered against due to it being “a ‘given’, for the purposes of developing spatial strategy alternatives, that they should not be allocated” (SA, Box 6.10). Effectively, the spatial strategy has been pre-determined to the detriment of any proper assessment of reasonable spatial strategies;
 - (3) The 2017 Housing Delivery Topic Paper recognises that due to a severe shortfall of sites available to deliver homes during the early part of the Plan period, “... we consider it is necessary to consider the potential of each PDA regardless of its Green Belt sensitivity” (para. 4.41). The SA has fundamentally failed to consider the potential of PDAs to boost housing delivery by assuming that it is a ‘given’ they should not be allocated based upon a fundamentally flawed LAA assessment process.
- 1.7 The second part of the LAA Appendix E assessment regarding Green Belt sensitivity will be considered elsewhere in this Hearing Statement.
- 1.8 The SA is inadequate because despite the housing strategy generating significant unmet housing need during the early part of the Plan period, the SA fails to give proper consideration to 22 PDAs which are described as ‘reasonable options’, because it is a ‘given’ in any SA testing scenario, that such sites should not be considered. This has resulted in no consideration being given through the SA process to sites identified within the GBCS as PDAs; considered ‘reasonable options’ within the SA; and adjacent to sustainable ‘inset villages’ due to a fundamentally flawed LAA assessment process carried across into the SA with no independent reassessment / reconsideration by AECOM. The SA has therefore failed to assess all reasonable options to meet identified housing need across all parts of the Plan period.

M&I 2 – Calculation of OAHN

M&I 2.1 – Migration Trends and UPC

- 2.1 As explained in Section 2.0 of our 2017 representations, the 10-year migration plus UPC scenario set out in the *'West Surrey Strategic Housing Market Assessment: Guildford Addendum Report 2017'* should be rejected as an outlier compared with the three competing non-UPC options. Given the close alignment between the 2014-based SNPP plus MYE scenario and the 10-year migration trend, it is considered robust to assume a baseline demographic housing need of between **577-584 dpa** as per Table 9. This aligns with the recommendation that *"GL Hearn consider that using the latest official projections (including with adjustments such as 10-year migration trends) will provide the best estimates of future need"* (para. 3.77).

M&I 2.2 – Student Housing

- 3.1 Dandara Ltd agrees with the SHMA addendum that student growth is not represented within the demographic baseline projections and therefore *"... it is reasonable to expect that an increase in the student population would result in an additional housing need over and above the demographic analysis"* (para. 7.11).
- 3.2 Whilst we also agree with the conclusions set out in para. 7.14 that an additional 23 / 24 dpa should be added to the demographic baseline to acknowledge housing demand arising from future student growth, we would ask the Inspector to confirm with the University of Surrey that their projected 3,800 student increase is expected to occur over the Plan period rather than in the 10 year period 2015/16 to 2026/27 as suggested in para. 7.6. If additional student growth over and above the 3,800 figure is expected to occur during the latter part of the Plan period 2027/28 to 2034, an additional uplift should be applied.

M&I 2.3 – Market Signals and Housing Affordability

- 4.1 Paras. 5.29 to 5.39 of the SHMA addendum demonstrate a clear picture of a Borough with an unbalanced housing market.
- 4.2 Dandara Ltd agrees with the conclusions of the SHMA at para. 5.44 that, *"the evidence conclusively supports an upward adjustment to improve affordability, taking account of the market signals and affordable housing needs evidence"*.
- 4.3 The SHMA proposes to address some of the most unbalanced market housing stock in the country, set against deteriorating affordability, by providing an additional 52 dpa to *"... increase household formation rates amongst the 25-34 age group and return these to the levels in 2001"* (para. 8.16). No evidence is provided that a modest 52 dpa uplift would materially improve affordability and access to housing in the Borough.
- 4.4 Having regard to Figure 24 of the SHMA, and on the basis that accommodating student growth can be 'ringfenced' as a specialist housing need, it is considered, having regard to market signal adjustments made to Local Plans with comparable, albeit in the majority of cases less pronounced, market signal affordability indicators (e.g. Waverley at 25% uplift), that a minimum 20% uplift should be applied to the SHMA recommended demographic starting point of 577-584 dpa. This would give an annual housing target of **692-701 dpa** (n.b. excluding any associated uplift for employment growth and students) to positively address barriers to housing within Guildford as required by PPG.

- 4.5 It is worth noting that the focus of the 2018 draft revised NPPF and associated standard housing methodology is on improving affordability which provides further weight to applying a 20% uplift in response to market signals.

M&I 2.4 –Affordable Housing Need

- 5.1 The SHMA reports that 517 households per annum require support in meeting their housing need with para. 5.23 explaining that with a policy requiring 40% affordable housing delivery, 1,293 dpa would be required to meet affordable housing needs in full. Whilst we agree with GL Hearn that a housing target of 1,293 dpa is unrealistic, it provides further weight to the Council applying a 20% uplift to the demographic starting point to positively address market signals and boost affordable housing delivery as far as practical / realistic.

M&I 2.5 – Employment Growth

- 6.1 The 2017 SHMA considered updated econometric forecasts published in late 2016. Despite applying the same methodology to calculate change in workplace employment – para. 5.9 of 2015 SHMA and para. 4.6 of 2017 SHMA – there are significant differences in workplace employment between the two iterations.
- 6.2 Para. 4.7 of the 2017 SHMA addendum explains that “... AECOM calculate that workplace employment in Guildford between 2015 and 2034 is anticipated to grow by 12,893. This represents a reduction of 4,845 net additional jobs from the previous version of this calculation (17,738) issued in August 2015 ...”. Whilst the Plan period has reduced from 20 to 19 years, this still represents a dramatic reduction from 887 jobs pa within the 2015 SHMA to 679 jobs pa within the 2017 SHMA addendum. This represents a reduction in annual workplace jobs growth of 23%.
- 6.3 Box 6.7 of the SA recognises the impact of the revised projection on the Local Plan housing target “the addendum finds a need for a very small uplift of just 2 dpa, which is a considerable deviation from the SHMA 2015 (120 dpa). This is primarily because updated employment forecasts (from Nov / Dec 2016) are lower ...”. When looking at potential uplifts to the demographic baseline to support economic growth and job creation, para. 4.26 of the 2017 SHMA explains that “the 2014-based SNPP scenarios would support between 12,700 – 12,800 jobs ...”. Whilst this closely aligns with the post-Brexit 2016 economic forecasts used within the 2017 SHMA addendum, it is evident that it is significantly below the 17,738 jobs projected within the 2015 SHMA.
- 6.4 Given the sizable discrepancies between the economic forecasts, there is very little interrogation of the principal differences within the 2017 SHMA. Our 2017 representations raised five questions at para. 2.24 that the Inspector may consider putting to the Council to better understand the deviation between the 2015 and 2017 SHMAs concerning employment growth, especially if the latter is unduly influenced by economic predictions regarding the impact of Brexit which remain uncertain.
- 6.5 There is a concern that even if one takes a mid-point between the post-Brexit 2016 projections and the original 2015 SHMA projections, there would be a significant shortfall in housing delivery to support projected jobs growth. This would result in economic growth being stifled by lack of housing supply resulting in exacerbated levels of in-commuting, housing price rises (including rental) and decreasing levels of affordability. We therefore consider that an uplift significantly larger than the 2 dpa proposed above the demographic

baseline is required to support economic growth. At the very minimum, the Plan should consider identifying reserve sites if employment growth is closer to the 2015 SHMA economic forecasting to ensure that housing delivery is able to keep pace with jobs growth and not undermine the economic strand of sustainable development.

M&I 3.1 and 3.2 – Unmet Need in HMA

- 7.1 The examination of the adopted Waverley Local Plan robustly assessed and tested the quantum of unmet housing need arising from Woking which forms a HMA with Waverley alongside Guildford. An allowance was made for Waverley to accommodate half of Woking’s unmet need at 83 dpa.
- 7.2 In Guildford’s response to the Inspector’s initial questions 1-8 (ref. GBC-LPSS-001) they state that *“Guildford is not able to sustainably meet any additional growth in the period relevant to Woking’s need. If Guildford were able to then such development would be required to boost Guildford’s own early delivery”*. This is fundamentally incorrect.
- 7.3 The Local Plan evidence base relating to Green Belt release principally comprises the GBCS. The GBCS identifies various PDAs which can accommodate appropriate development **without significantly compromising the purposes of the Green Belt**. A detailed review of the GBCS methodology and results is included at Section 4 of Dandara Ltd’s 2016 representations to the Proposed Submission Local Plan (attached at Appendix 1) and at Section 5.0 of our representations to the 2017 targeted changes (attached at Appendix 2). These demonstrate that there are additional PDAs available, including land off Shere Road in West Horsley, that have been rejected for allocation without proper consideration or justification:
- Land off Shere Road falls within parcel E4 of the GBCS which is assessed against the five Green Belt purpose tests included at para. 80 of the NPPF. The GBCS concludes that *“land parcels D6, E4 and E5 provide opportunities to accommodate appropriate development without significantly compromising the purposes of the Green Belt”* (Volume 1, Box 1.40, pg. 20);
 - PDAs were then identified within the respective parcels considered to provide opportunities to accommodate appropriate development with para. 1.23 of the GBCS explaining that *“the Study has demonstrated that there are a number of areas which provide opportunities to appropriately accommodate development within the surroundings of certain villages across the Borough”*;
 - Land off Shere Road is identified as PDA E4-B due to being *“... continuous with residential properties on Shere Road ... generally contained by rising topography and treecover ... together with boundary treecover on the A246 Epsom Road”* (Volume 1, Box 1.40, pg. 20);
 - The GBCS explains that, *“the Study intends to provide the Council with sufficient flexibility to allocate the necessary number of village PDAs and through consideration of the Green Belt purposes score, sustainability rankings and environmental constraints, allows for comparison between those PDAs that have been identified, prior to potential allocation by the Council”* (GBCS, summary document, para. 4.9);
 - PDA E4-B was thus subject to Environmental Capacity Analysis within Volume 3 of the GBCS. Following assessment against nine environmental capacity criteria, it was concluded that PDA E4-B was *“... surrounded by defensible boundaries including hedgerows and treecover following the A246 Epsom Road to the north, hedgerows bordering Shere Road to the east,*

- rising topography and hedgerows bordering residential properties at Wix Hill to the south and west of the PDA”;*
- Volume V, Appendix XIV of the GBCS considers the sustainability credentials of each PDA. Looking at the comparative sustainability of all Horsley PDAs, of which there are a total of seven, PDA E4-B is the second most sustainable in respect of access to shops, services and sustainable transport modes. Looking at access to recreation facilities, PDA E4-B similarly performs second best.
- 7.4 Whilst this part of our Hearing Statement goes into some site specific detail, it is important to show that the Council has demonstrated within its own evidence base that there are PDAs, such as but not limited to E4-B, which have been identified within the GBCS as providing opportunities to accommodate appropriate development without significantly compromising the purposes of the Green Belt as well as being inherently sustainable with no environmental constraints. In the case of PDA E4-B, the topography of the site alongside surrounding housing and tree cover effectively create a self-contained development parcel with limited impact on Green Belt purposes or the wider landscape.
- 7.5 Despite the conclusions of the GBCS regarding PDAs and their respective contribution to Green Belt purposes, sustainability and environmental constraints, para. 3.6 of the *‘Green Belt and Countryside’* Topic Paper (2017) explains that some additional work was undertaken to the GBCS evidence base “... following a resolution made at an extraordinary meeting of the Council on 13 January 2014. This resulted in a special Local Plan Scrutiny Forum, held on 4 March to enable the community to share their views on the evidence base and raise issues concerning methodology and fact only. This exercise led to the preparation of Volume II addendum and a re-issue of Volume IV”.
- 7.6 Para. 4.46 of the *‘Housing Delivery’* Topic Paper (2017) explains that “the draft Local Plan (2014) treated all PDAs as reasonable options for development regardless of the extent to which the land parcel within which it sits scored against Green Belt purposes (as shown on the sensitivity map)” and “whilst PDAs have been identified on the basis that they would not fundamentally harm the main purposes of the Green Belt, there would nevertheless be, in relative terms, more harm caused by allocating sites within land parcels assessed as contributing more towards the purposes of the Green Belt than those judged to be of lesser Green Belt value”.
- 7.7 The production of this latter evidence base identifies the entirety of parcel E4 as falling within ‘high sensitivity’ Green Belt. The LAA then seemingly uses the application of this additional evidence base addendum to justify not only the exclusion of PDA E4-B from the proposed submission Local Plan, but also to justify not considering the site for development in any further detail despite the clear recommendation of the original GBCS and the identification of the land as a PDA. The Council has effectively retrofitted an existing evidence base document in the GBCS to satisfy political concerns raised regarding the potential extent of Green Belt loss, notwithstanding that the fundamental basis of the identification of PDAs is that their development would not undermine Green Belt purposes.
- 7.8 Dandara Ltd has commissioned a technical note by specialist landscape consultancy Define (see Appendix 3) which raises a number of methodological and procedural deficiencies regarding the retrofitting of the GBCS regarding PDAs. These can be summarised as:

(1) The original GBCS divided the Borough into a series of ‘macro-scale’ Green Belt assessment parcels which were then subject to the five NPPF Green Belt purpose tests to establish their development potential. This resulted in the conclusion that *“land parcels D6, E4 and E5 provide opportunities to accommodate appropriate development without significantly compromising the purposes of the Green Belt”*. This led to the identification of PDA E-4B which displayed characteristics of self-containment due to topography, surrounding housing and vegetation. As recognised by the original GBCS, the site-specific features of PDA E-4B are wholly different from the typical performance of the wider Green Belt parcel in which the site is located **hence why the PDA was isolated** from the wider Parcel E4. **To apply a retrofitted ‘macro-scale’ Green Belt sensitivity map which is treated as superseding a more detailed ‘micro-scale’ PDA assessment is neither robust nor defensible** and has resulted in various PDAs being excluded from consideration for allocation;

(2) Whilst the Council has commissioned a latter Green Belt sensitivity map which places parcel E4 within high sensitivity Green Belt, the Authority has made no effort, unlike the original GBCS, to reassess previously identified PDAs to understand the contribution they make to the characteristics of the wider parcel that result in ‘high sensitivity’.

- 7.9 There were only two reasons cited within the LAA for why land off Shere Road, West Horsley was not considered for allocation despite being identified as a PDA within the GBCS (site ID 2175). The first related to a perceived inconsistency with the SA spatial strategy and site allocations which has been demonstrated as unjustified and unevidenced under M&I 1.1 above. The second relates to the parcel being located within ‘high sensitivity Green Belt’ which we have demonstrated is inconsistent with the identification of the site as a PDA within the original GBCS which included an assessment of the wider Green Belt parcel and the conclusion that PDA E-4B due to its self-contained character, did not contribute to the five Green Belt purposes nor the wider function of parcel E4.
- 7.10 The Inspector must require the Council to properly consider the potential for PDAs identified within the GBCS to contribute additional homes to boost the Borough’s OAHN, deliver a greater number of homes during the early part of the Plan period and assist neighbouring Woking with addressing unmet need.

M&I 4 – Housing Trajectory

M&I 4.1 – Increased Early Year Delivery

- 8.1 The stepped housing trajectory within Policy S2 is unsound and a product of the failure of the Plan to satisfy the ‘justified’ test of soundness as the most appropriate strategy considered against reasonable alternatives. We have demonstrated under M&I 3.1 and 3.2, using land off Shere Road, West Horsley as an example, that there are a range of small and medium scale sites identified within the GBCS as PDAs that do not contribute to the main purposes of the Green Belt; contain no finite environmental constraints; are inherently sustainable; and are contiguous with the settlement boundary of para. 4.1.6 ‘inset villages’. These provide a realistic and deliverable source of additional small and medium scale sites that could boost early delivery given the already chronic housing need observable within the Borough.

M&I 4.2 & 4.3 –Housing Trajectory incl. Infrastructure

- 9.1 As explained under M&I 4.1, the stepped housing trajectory in Policy S2 is unsound and unjustified, being a product of an unbalanced housing strategy which has excluded a range of small and medium scale sites, including PDAs, without proper consideration or justification, resulting in an over-reliance on a limited number of large, strategic scale allocations.
- 9.2 Whilst we recognise Guildford will require a range of strategic development sites to deliver OAHN and unmet need arising from Woking, these should be delivered alongside a balance of smaller and medium scale sites. The trajectory shown on pg. 22 of the 2017 LAA illustrates both a shortage of small and medium scale sites and reliance upon a small number of strategic sites consistently expected to deliver optimistic housing completions set against significant infrastructure delivery burdens.
- 9.3 Notwithstanding the ‘in principle’ soundness concern of the stepped trajectory, there are fundamental risks associated with ‘backloading’ the housing trajectory as proposed within the Local Plan:
- The SHMA identifies significant challenges to accessing housing in Guildford resulting from a shortage of development land, historically low levels of housing delivery and an accumulated – 1,281 shortfall within the first four years of the Plan period. The stepped trajectory risks exacerbating the unbalanced housing market by applying a ‘policy on’ barrier to boosting housing delivery within the early part of the Plan period;
 - Having regard to Policy S2, it is not until 2026/27, being over a decade into the Plan period, that the Council applies a housing target sufficient to meet its assumed OAHN;
 - There are evidenced infrastructure and site specific challenges associated with the delivery of the strategic sites which threaten the consistent levels of uninterrupted delivery projected within the LAA trajectory;
 - To deliver sufficient homes to meet assumed OAHN over the Plan period the Council is relying on large, complicated development sites to come forward when planned and deliver consistently high numbers of new homes, over 200 dpa in some cases, with no slowing or interruptions in delivery.
- 9.4 Section 6.0 of our 2016 representations goes into significant detail regarding the deliverability of the housing trajectory (see Appendix 4). With specific reference to infrastructure, we would ask the Inspector to satisfy himself of the following, liaising as appropriate with the Council, SCC and Highways England:
- (1) Confirmation of those infrastructure projects that are critical to support the delivery of the strategic allocations with particular focus on the A3/M25 junction improvements and the A3 improvements through Guildford;
 - (2) Confirmation of the funding status of these projects and whether funding is secured / ringfenced or remains pending. If relying upon financial contributions from allocated sites, how does this impact upon viability and affordable housing delivery;
 - (3) Confirmation of how many, if any, new homes can be delivered on the strategic allocation sites before the completion of the infrastructure works and ensuring that such phasing is accurately reflected within the housing trajectory;

(4) Understanding timescales for delivery and whether it is realistic to expect A3 improvement works to be undertaken around Guildford as well as towards the M25 junction at Wisley simultaneously;

(5) Considering site specific challenges to delivery including necessary CPOs and infrastructure relocation works (e.g. Slyfield).

M&I 5 – Five Year Housing Land Supply

- 10.1 We consider the Council's five year housing land supply in detail in Section 4.0 of our 2017 representations attached at Appendix 5.
- 10.2 The staggered trajectory and use of the Liverpool methodology is not considered sound until the Council has demonstrated that it has considered the potential for all small and medium scale sites, including PDAs identified within the GBCS, to deliver housing within the early part of the Plan period.
- 10.3 As well as the 'Liverpool' methodology being against PPG (para: 035, ref ID: 3-035-20140306), the cumulative effect of the 'Liverpool' methodology and the staggered housing trajectory is to delay both the delivery of housing which should have already been completed during the first four years of the Plan period and OAHN baseline need. This will exacerbate the existing unbalanced housing market within the Borough resulting in increased unaffordability, suppressed household formation and rates of homelessness / overcrowding.
- 10.4 This approach is not considered sound being inconsistent with national policy and para. 47 of the NPPF. We reiterate that the Borough benefits from a supply of small and medium scale sites, including PDAs, which have been excluded without sufficient evidence or justification and would assist with addressing historically accrued housing backlog under the PPG recommended 'Sedgefield' methodology and allowing OAHN to be met across the Plan period. Until the Council has committed to a review of 'omission' small and medium scale sites, including PDAs, the Inspector should not entertain the use of the stepped trajectory and 'Liverpool' methodology which has simply been contrived by the Council to establish an arbitrary and un evidenced land supply position.
- 10.5 The Plan has only 4.15 years housing supply, even applying the stepped trajectory, as follows:
- Stepped trajectory of $(450 \times 2) + (500 \times 3)$ over 2019/24 = 2,400;
 - Shortfall of **- 1,281** during the Plan's first four years;
 - Baseline target of $2,400 + 1,281 \times 1.2$ (20% buffer) = 4,417;
 - 'Potential housing provision' in 'first five years' on pg. 22 of LAA (2017) = 3,669;
 - Requirement of 4,417 minus supply of 3,669 gives shortfall of **- 748** being 4.15 years supply.

M&I 9.1 – Preamble to Policy S2

- 11.1 The preamble to Policy S2 would be clearer if it established a simple settlement hierarchy towards which development would be focused, either within existing settlements or adjacent as part of future allocations. This is a simple matter of para. 4.1.6 clarifying which

settlements fall under the 'urban areas'; 'inset villages'; and 'identified Green Belt villages' categories.

M&I 9.2 – Strategic Location of Housing

- 12.1 The Plan generally directs housing to the most sustainable places starting with Guildford before moving onto urban areas, Ash and Tongham and the villages. It is however considered that the level of services and facilities available in some of the larger villages, such as the Horsleys which benefit from a railway station and regular bus services along the A246 into Guildford, could accommodate greater housing numbers. There is scope to increase housing delivery within sustainable villages which would represent legible and proportionate additions, utilising PDAs identified within the GBCS with minimal Green Belt or landscape harm as identified within the Council's own evidence base.

M&I 9.5 – Exceptional Circumstances

- 13.1 Exceptional circumstances have been demonstrated to justify the release of Green Belt land surrounding sustainable settlements. As explained previously for land off Shere Road in West Horsley, there is a compelling case to revisit the unevidenced and unjustified exclusion of such sites which demonstrate characteristics which cumulatively satisfy the exceptional circumstances test:

- The site is contiguous with the settlement boundary of West Horsley as a para. 4.1.6 sustainable 'inset village';
- The site is identified as a PDA within the GBCS capable of accommodating development without compromising the five Green Belt purposes;
- The GBCS assesses the site as one of the most sustainable in the Horsleys;
- The site is unconstrained from an ecological, habitat, flood risk or heritage perspective;
- The site can deliver much needed new homes to boost OAHN and assist Woking under the DtC alongside providing an uplift to housing delivery during the early years of the Plan.

M&I 9.6 – Inset Villages

- 14.1 The Plan takes a broadly sound approach towards the inseting of the most sustainable villages from the Green Belt notwithstanding the opportunity for the settlement boundaries for these villages to be adjusted to accommodate additional PDAs identified within the GBCS.

M&I 9.7 – AONB and AGLV

- 15.1 The retention of the AGLV designation has not been soundly demonstrated. As explained in para. 4.3.4 of the Plan, this has simply been carried forward from the Surrey County Structure Plan and in an Authority constrained by AONB, Green Belt and SPAs, is considered an unevidenced and unjustified additional barrier to housing delivery. The AGLV is generally contiguous with the AONB and is not considered to either warrant inclusion within the AONB following a review of the AGLV bounding the AONB – see <http://www.surreyhills.org/boundary-review/> - nor is it required to protect the setting of the AONB as the impact of any development proposed within the setting would be considered under the statutory process of decision making.

M&I 9.8 – Accommodating Increased OAHN

- 16.1 As explained elsewhere in this Hearing Statement, the Plan can accommodate a higher housing requirement without fundamentally altering the spatial strategy set out in para. 4.1.6 given the identification of PDAs within the GBCS adjacent to sustainable 'inset villages' which have been excluded from consideration without sound evidence or justification.

Appendix Contents:

- Appendix 1 – Section 4 of 2016 Representations
- Appendix 2 - Section 5 of 2017 Representations
- Appendix 3 - Define GBCS Technical Note
- Appendix 4 - Section 6 of 2016 Representations
- Appendix 5 - Section 4 of 2017 Representations

Appendix 1 – Section 4 of 2016 Representations

4.0 Green Belt and Countryside Study

- 4.1 These representations are accompanied by a Technical Note, prepared by specialist landscape and Green Belt consultancy Define, in respect of the Guildford Borough Green Belt and Countryside Study (GBCS). This Technical Note assesses in detail the Green Belt evidence base underpinning the proposed submission Local Plan, raising a number of substantive concerns regarding the methodology and particularly the latter production of a macro-scale, Green Belt sensitivity map which has been applied to land to the west of Shere Road, West Horsley as a finite constraint despite the site previously having been individually assessed and identified in the GBCS as a Potential Development Area (PDA). Furthermore, other sites proposed for allocation within the draft Plan fall within the same broad high sensitivity Green Belt designation yet are conversely deemed acceptable.

Parcel Assessment

- 4.2 Volume I of the GBCS explains how Guildford Borough was divided into various assessment parcels which were then tested to understand how each parcel serves the purposes of the Green Belt. Para 1.6 expands upon this methodology by stating that *“following the identification of parcels of land, such parcels were scored based upon their current adherence or otherwise to the purposes of the Green Belt. In particular, this included the ability to check the unrestricted sprawl of large built up areas, the prevention of neighbouring towns from merging into one another, assistance in safeguarding the countryside from encroachment, and the preservation of the setting and special character of historic towns”*.
- 4.3 Land to the west of Shere Road in West Horsley is located within Parcel E4 for assessment purposes within the GBCS. The Study concludes, having assessed the parcel against the five Green Belt purpose tests included at para. 80 of the NPPF, that ***“land parcels D6, E4 and E5 provide opportunities to accommodate appropriate development without significantly compromising the purposes of the Green Belt”***. In order to understand which parts of the wider land parcels are potentially suitable for development without significantly compromising the purposes of the Green Belt, the GBCS goes on to identify individual Potential Development Areas (PDAs) within each wider land parcel.
- 4.4 Para. 1.23 explains that ***“the Study has demonstrated that there are a number of areas which provide opportunities to appropriately accommodate development within the surroundings of certain villages across the Borough”***. The majority of the land falling to the west of Shere Road in West Horsley being promoted for residential development by Dandara Ltd was identified as PDA ‘E4-B’. The full entry for parcel E4 and PDA E4-B is reproduced below, taken from pg. 20 of Volume I of the GBCS.

1.40 West Horsley (South)	
Land Parcels	Potential Development Areas
D6, E4 and E5	<p>Land parcels D6, E4 and E5 provide opportunities to accommodate appropriate development without significantly compromising the purposes of the Green Belt. A PDA (D6-C) has been identified to the north of West Horsley (South) continuous with residential properties on Silkmore Lane, Fairwell Lane and Pincott Lane. D6-C is generally contained by a local undulation, hedgerows and railway infrastructure, however, is located to the north and east of West Horsley (South) Conservation Area and Hatchlands Park Registered Park and Gardens.</p> <p>Other PDAs have been identified on the junction of the A246 Epsom Road and Shere Road, continuous with residential properties on Shere Road (E5-A); and enclosed by Epsom Road, Wix Hill and Shere Road (E4-B). The PDAs are generally contained by rising topography and treecover at Hook Wood, The Sheepleas and Effingham Forest, together with boundary treecover on the A246 Epsom Road. The PDAs are located 0.4km to the east of Hatchlands Park Registered Park and Gardens, however are visually separated by treecover following the A246. The PDAs are located within the Surrey Hills Area of Great Landscape Value (AGLV), and as such development, <i>'should be consistent with the intention of protecting the distinctive landscape character of the area'</i> (Local Plan Policy RE 6). The PDAs are also located within the visual context of the Surrey Hills AONB located approximately 0.2km to the south. As a consequence, any development within the PDAs <i>'should not result in the loss of important views to or from the AONB.'</i> (Para. 10.25, Local Plan Policy RE5).</p>

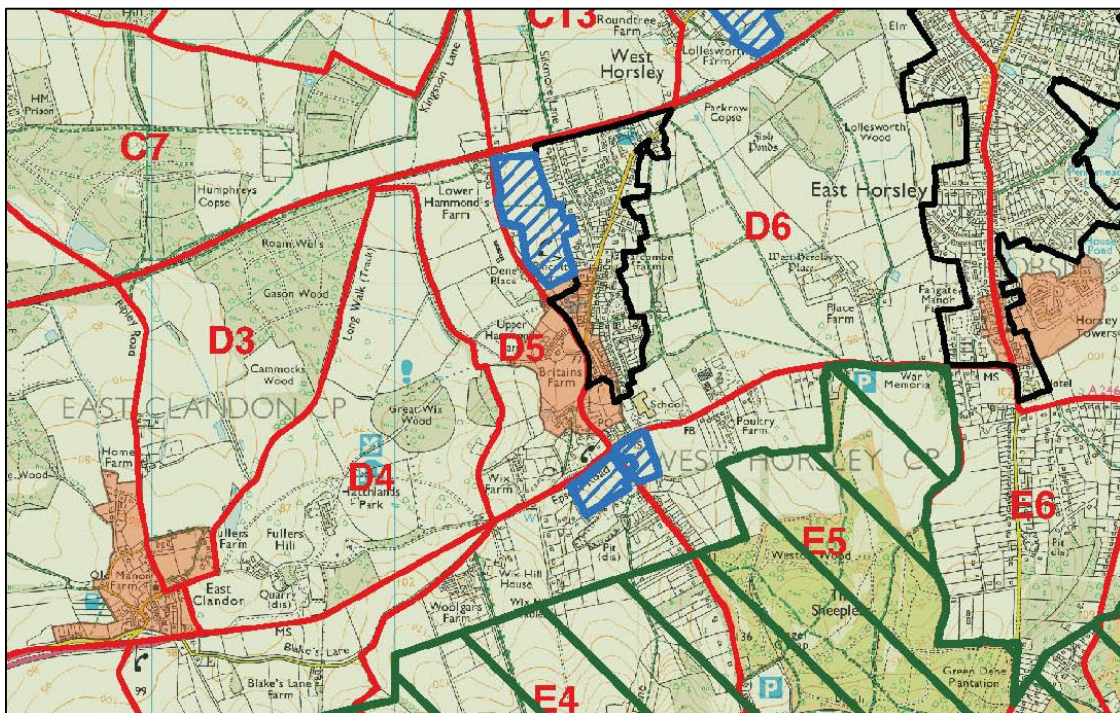


Figure 5: PDAs in West Horsley (including land west of Shere Rd)

- 4.5 The GBCS therefore considered the developability of land in the Green Belt based upon the following four principal stages:

Stage One - Sub-division of the Borough into separate land parcels;

Stage Two - Assessing the degree to which each land parcel contributes to the five principal purposes of the Green Belt established within para. 80 of the NPPF;

Stage Three – Following the identification of PDAs within those parcels considered to provide development potential without undermining the principal purposes of the Green Belt, each of the PDAs were assessed from a sustainability perspective including ease of access to shops, services and social and community facilities;

Stage Four - Assessing the environmental capacity of the land parcels to accommodate appropriate development.

Sustainability and Environmental Capacity

- 4.6 Volume V, Appendix XIV of the GBCS considers the sustainability credentials of each PDA based upon a variety of indicators including distance to shops, services and sustainable transport modes. The assessment is split into two, the first part looking at the proximity of everyday services and the second part looking at the proximity of recreation facilities. Each PDA is given a score depending upon the distance to each named facility, which are then totalled to give an overall placing out of 44 PDAs.
- 4.7 In respect of accessibility to a range of shops, services and public transport modes, land to the west of Shere Road, West Horsley (PDA E4-B) is provided a sustainability score of 7.25 which places the site 18th most sustainable out of the 44, thus falling within the top 40%. The second part of the assessment, considering accessibility to recreation facilities, gives the site a sustainability score of 9 which equates to an average of 2.25 for each indicator, placing the site as the joint second most sustainable in respect of access to recreation facilities amongst all 44 PDAs.
- 4.8 Looking at the comparative sustainability of all West Horsley and East Horsley (North and South) PDAs, of which there are a total of seven, land to the west of Shere Road (PDA E4-B) is considered to be the second most sustainable in respect of access to shops, services and sustainable transport modes, with a total score of 7.25. Looking at access to recreation facilities, land to the west of Shere Road (PDA E4-B) similarly performs second best, with a total score of 9 (n.b. the next most sustainable site only has a score of 5).
- 4.9 The site was then subject to Environmental Capacity Analysis within Volume 3 of the GBCS. The PDA parcel 'E4-B' was assessed on pg. 125 as being *"... surrounded by defensible boundaries including hedgerows and treecover following the A246 Epsom Road to the north, hedgerows bordering Shere Road to the east, rising topography and hedgerows bordering residential properties at Wix Hill to the south and west of the PDA"*. The Study then assesses nine environmental capacity criteria which are reproduced below:

Land Use - The PDA is currently used for arable farmland;

Topography - The PDA is located on the lower slopes of the rising escarpment of the North Downs at White Hill. The PDA is located on slightly sloping topography from the south to north, between approximately 85 and 90 metres AOD.

Landscape Character - The PDA comprises of two pastoral and arable fields located on sloping ground between residential properties on Wix Hill, Shere Road and the A246 Epsom Road. The fields are enclosed by moderate treebelts between the PDA and playing fields to the east, with residential gardens following Shere Road to the south and west of the PDA. Urban influences are generally provided by residential properties on Shere Road to the east and Will Hill to the west of the PDA.

Landscape Value - The PDA is located within the Surrey Hills AGLV and approximately 0.2km to the north of the AONB.

Nature Conservation - The PDA is not subject to any statutory or non-statutory nature conservation designations.

Cultural Heritage - The PDA is not subject to any statutory or non-statutory cultural heritage designations.

Flood Risk - The PDA is not identified as land at risk from flooding.

Agricultural Land Classification - The PDA is predominately located on Grade 3 (moderate/good) agricultural land.

Public Rights of Way and Access - The PDA could potentially be accessed via Shere Road. There are no PROW crossing the PDA.

Addendums

- 4.10 When the Council consulted on their previous 2014 draft Local Plan, land to the west of Shere Road was identified as falling within parcel E4 which was considered to have development potential, latterly refined to include the majority of Dandara Ltd's site as PDA E4-B. Furthermore, the site was considered to be amongst the most sustainable surrounding existing villages across the Borough and subject to no known constraints. The clear recommendation made by the GBCS was that the Council should give serious consideration to the development potential of the site as PDA E4-B.
- 4.11 However, para. 3.6 of the *'Green Belt and Countryside'* Topic Paper explains that some additional work was undertaken to the GBCS evidence base "... arising from a resolution made at an extraordinary meeting of the Council on 13th January 2014 which resulted in a special Local Plan Scrutiny Forum, held on 4th March. The enabled the community to share their further views on the evidence base and raise issues concerning methodology and fact".
- 4.12 Para. 4.18 of the *'Housing Delivery'* Topic Paper (2016) attempts to explain this additional work in more detail:

“The draft Local Plan (2014) treated all PDAs as reasonable options for development regardless of the extent to which the land parcel within which it sits scored against Green Belt purposes (as shown on the sensitivity map). However, following the feedback from consultation and the new evidence available, we have reconsidered how Green Belt is used as a constraint. The Proposed Submission Local Plan seeks to give weight to the sensitivity of the Green Belt parcel within which each PDA is located. Whilst PDAs have been identified on the basis that they would not fundamentally harm the main purposes of the Green Belt, there would nevertheless be, in relative terms, more harm caused by allocating sites within land parcels assessed as contributing more towards the purposes of the Green Belt than those judged to be of lesser Green Belt value. In giving greater weight to the sensitivity of the Green Belt, we are have therefore sought to ameliorate the consequent impacts on the Green Belt as much as is reasonably possible”.

- 4.13 The production of this latter evidence base identifies the entirety of parcel E4 as falling within ‘high sensitivity’ Green Belt. The LAA then seemingly uses the application of this additional evidence base addendum to justify not only the exclusion of PDA E4-B from the proposed submission Local Plan, but also to justify not considering the site for development in any further detail despite the clear recommendation of the original GBCS and the identification of the land as a PDA. These representations raise the following serious concerns regarding the methodology of the composite GBCS, expanded upon in the accompanying Technical Note prepared by Define:

(i) Inconsistencies of Methodology

- 4.14 As explained above, the original GBCS divided the Borough into a series of ‘macro-scale’ Green Belt assessment parcels which were then subject to the five NPPF Green Belt purpose tests to establish their development potential. Whilst the majority of parcel E4, due largely to much of the land to the south falling within the Surrey Hills AONB, was not considered suitable for development, it was recognised that the far north-east corner displayed characteristics of self-containment that justified its identification as PDA E4-B. The GBCS has therefore justifiably started the assessment of each parcel from a ‘macro-scale’, applying the five Green Belt purpose tests set out in the NPPF, prior to then identifying PDAs at a site-specific, ‘micro-scale’ which should be considered further for development.
- 4.15 The justification of the Council provided in para. 4.18 of the ‘Housing Delivery’ Topic Paper that “... *in relative terms, more harm is caused by allocating sites within land parcels assessed as contributing more towards the purposes of the Green Belt than those judged to be of lesser Green Belt value*”, is unjustified and unsound. This is principally because, as recognised in Volume IV of the GBCS, the parcelisation process is not based on ‘quality’ of the Green Belt but defensible boundaries such as roads, railway lines and land forms. On this basis, it is obvious that any parcel, regardless of its overall sensitivity, could contain sites which contribute little to the main Green Belt purposes of the wider parcel.
- 4.16 As recognised by the original GBCS which identified land to the west of Shere Road, West Horsley as a PDA, the site-specific features are wholly different from the typical performance of the wider Green Belt parcel in which the site is located (E4) in regard to its sensitivity to the Green Belt purpose tests. The majority of this wider parcel is open and rolling

countryside, and is not adjacent, between, or wholly enclosed by urban features (housing or roads) which is evident for Dandara Ltd's site. The site is located on rising land that is well structured by housing and vegetation, and as a result has very limited visibility from the wider landscape, a point of detailed assessment highly relevant to understanding likely Green Belt effects. The latterly commissioned 'macro-scale' Green Belt sensitivity map simply does not have the ability to recognise or appreciate this level of assessment detail.

- 4.17 It is unsound for the Council to present an evidence base which commences with a 'macro-scale' parcel assessment prior to then focusing on individual PDAs within certain parcels which are not considered to contribute to the five principal NPPF Green Belt purpose tests. To then subsequently apply a latter 'macro-scale' Green Belt sensitivity map which is treated as superseding the more detailed 'micro-scale' PDA assessments previously undertaken, is neither a robust nor defensible position. The PDA assessments comprised site-specific analysis of whether certain parts of wider parcels were developable and would have included consideration as to whether development of a particular site would have a wider adverse impact upon the parent parcel from a Green Belt purpose perspective. This approach is in direct conflicts with paras. 84 and 85 of the NPPF which advise that when defining boundaries, LPAs should *inter alia* ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development, and not include land which it is unnecessary to keep permanently open.

(ii) Absence of Assessment

- 4.18 Despite the identification of land to the west of Shere Road, West Horsley as a PDA within the GBCS, with the recommendation that the Council should give serious consideration to the development potential of each PDA in more detail, the Council has used the latter application of the Green Belt sensitivity map to seemingly justify exclusion of the site from the proposed submission Local Plan. Whilst the Council have commissioned a latter Green Belt sensitivity map which places parcel E4 within high sensitivity Green Belt, the Authority has made no effort, unlike the original GBCS, to assess the site further to understand the contribution it makes to the characteristics of the wider parcel that make it 'high sensitivity'.
- 4.19 Due to poor Plan preparation, one of the most sustainable sites in the Horsleys which is not considered to contribute to the five Green Belt purpose tests as identified within an independent, professionally produced Study has been excluded from consideration due to a line drawn on a map. As demonstrated in the attached Technical Note and expanded upon above, if the Council had undertaken this work, they would have concluded that land to the west of Shere Road shares none of the high sensitivity characteristics of the wider parcel, applying the NPPF Green Belt purpose tests.

(iii) Inconsistency of Application

- 4.20 The Council has also not been consistent in how the Green Belt sensitivity mapping has informed their decision making. Whilst they have used the fact that land to the west of Shere Road, West Horsley now falls within high sensitivity Green Belt as the only reason to justify its exclusion as a potential allocation site, land at Normandy / Flexford (Policy A46) was only ever partially identified as a PDA; has latterly been identified as falling within high

sensitivity Green Belt; but has subsequently been proposed for allocation in the proposed submission Local Plan for 1,100 new homes.

- 4.21 Furthermore, this proposed housing allocation occupies almost the entire extent of Green Belt parcel H12, which is all of high Green Belt sensitivity. This 'high sensitivity' Green Belt classification therefore applies to the entirety of this housing site as being of high sensitivity to Green Belt purposes, and it cannot be accurately claimed (as it can for land to the west of Shere Road and Green Belt parcel E4) that the difference in scale and performance of the wider Green Belt parcel and the site itself has distorted the site's Green Belt sensitivity and subsequent judgement of its development credentials. As can be seen from Figure 6 reproduced below, the Council is proposing housing allocations in a number of parcels of Green Belt identified as being of high sensitivity (parcels H12, K2 and K9), yet has used the same designation as justification for the rejection of land to the west of Shere Road despite it previously being identified as a PDA.

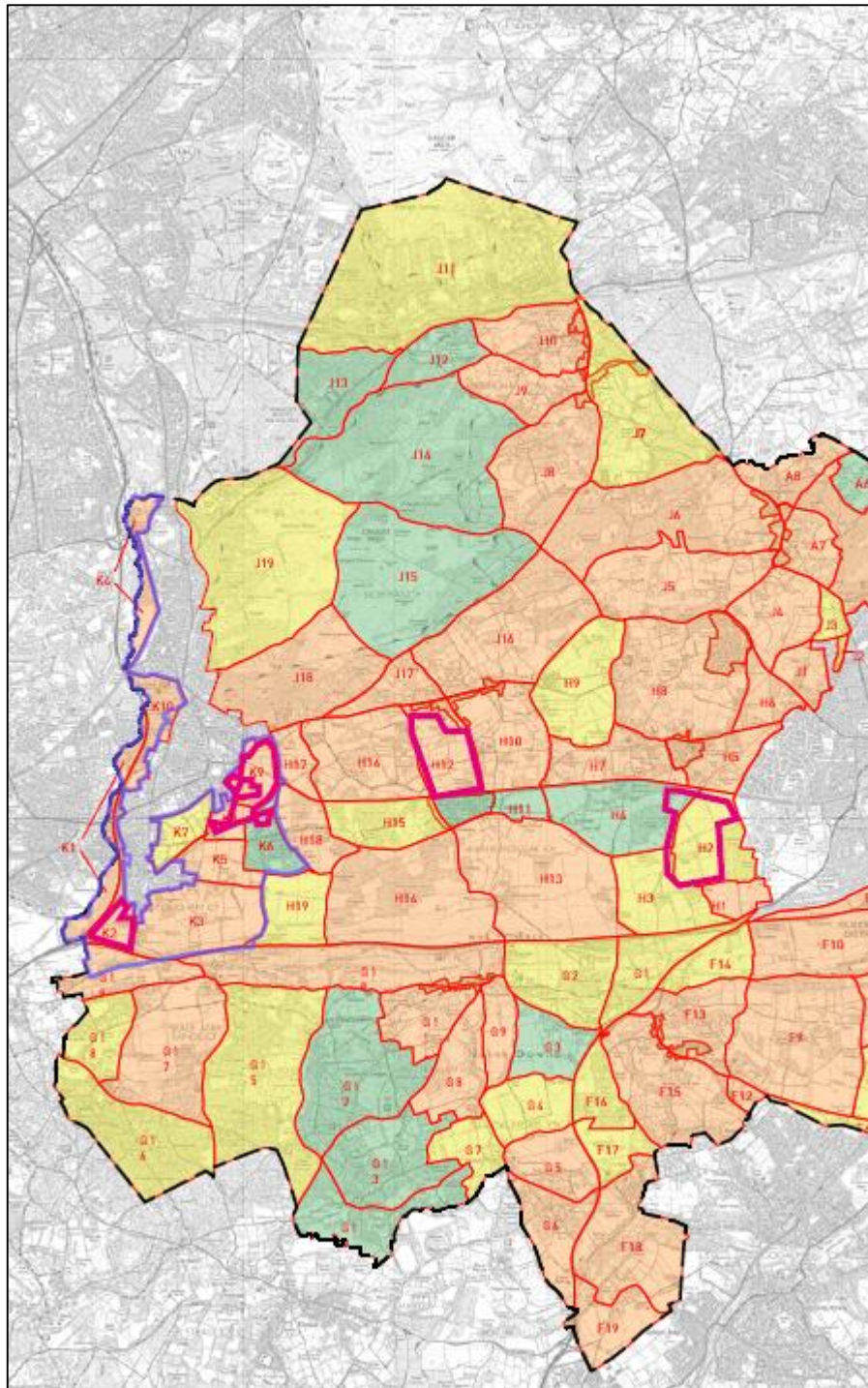


Figure 6: High Sensitivity GB and Housing Allocations

Draft Allocation Sites

4.22 These representations will go on to demonstrate that the Council should revisit previously identified PDAs in order to deliver a more balanced housing strategy capable of reinstating a five year housing land supply following adoption of the Plan. This would achieve a more certain, balanced and equitable spread of housing delivery across the Borough which reduces the current over-reliance on the delivery of large-scale, strategic sites with significant infrastructure burdens. There are also significant landscape and Green Belt

benefits to be delivered from reducing the scale of existing proposed allocations alongside increasing the number of smaller and medium scale sites deliverable over the Plan period:

Former Wisley Airfield – Whilst it is acknowledged that part of the site is located on previously developed land, the scale of development proposed at 2,100 new homes will represent a significant incursion into the Guildford Green Belt. Development of this scale will represent both significant encroachment into open countryside and the perception of urban sprawl into an otherwise largely undeveloped, rural part of the Borough. Given the isolation of the proposed allocation, it is recognised that future residents would rely on the use of the private car and regular bus services to access places of employment and higher order centres. This will generate significant movement within a much wider part of the Guildford Green Belt, undermining its rurality and increasing the sense of urbanisation. Furthermore, the scale of the proposed development bears no relationship to the settlement pattern in this part of Guildford which comprises small to medium scale villages and hamlets. The number of new homes proposed will also result in significant pressure upon the existing highway network, immediately adjacent SPA, local infrastructure and nearby habitats. The development, given its scale, will also be visible from the Surrey Hills AONB to the south which has not been taken into adequate consideration during the Plan making process. It is difficult to understand how the allocation of Wisley Airfield accords with the advice in para. 84 of the NPPF that *“when drawing up or reviewing Green Belt boundaries, Local Planning Authorities should take account of the need to promote sustainable patterns of development”*.

Normandy and Flexford – The Council is proposing to allocate 1,100 new homes in-between the two rural villages of Normandy and Flexford. This part of the Borough comprises Green Belt considered to be of high sensitivity, with development of this scale fundamentally undermining the NPPF Green Belt purposes of protecting the countryside from encroachment, preventing the coalescence of settlements and preventing urban sprawl. Development of this scale would represent a significant incursion into high sensitivity Green Belt and the urbanisation of an otherwise rural part of the Borough providing relief from the built up character of Guildford, Ash, Tongham and Aldershot and in conflict with para. 84 of the NPPF. It is of particular concern that the allocation is, as confirmed at para. 4.133 of the *‘Housing Delivery’* Topic Paper, to accommodate a secondary school which would serve a catchment extending from Guildford in the east to Ash / Tongham in the west. The extent of this catchment would result in significant daily vehicular movements within the Green Belt crossing some of the most strategic parcels, separating Guildford from Aldershot, undermining its tranquillity and sense of rurality;

Land off East Lane, West Horsley – Due to the Council not giving any substantive consideration to the developability of PDAs, such as land off Shere Road, West Horsley, by virtue of it being located within wider, high sensitivity Green Belt parcels, it has resulted in sites being proposed for allocation which, looking at a site specific level, have a greater impact on the NPPF Green Belt purpose tests. For example, the proposed development of land off East Lane, West Horsley represents both urban sprawl and encroachment into open countryside which would see significant development crossing East Lane to the south which currently provides a clear, defensible boundary in Green Belt terms. In contrast, land to the

west of Shere Road is surrounded by existing urban influences such as the A246 Epsom Road and housing and would represent coherent in-fill, rather than encroachment into open countryside.

Green Belt and Countryside Study – Conclusions

- 4.23 These representations have demonstrated that land to the west of Shere Road, West Horsley was identified in the Council’s own GBCS as a PDA following an assessment of the wider land parcel against the five NPPF Green Belt purpose tests. It has been shown that the GBCS recognised that the site was self-contained, dominated by urban influences with no visual interconnectivity with the adjacent AONB. The site was also shown to be one of the most sustainable in West and East Horsley with no known landscape or physical constraints to realising development.
- 4.24 Dandara Ltd has commissioned a Technical Note prepared by specialist landscape and Green Belt consultancy Define which concurs with the assessment of the GBCS that the site should be considered further for development as a PDA, applying the five NPPF Green Belt purpose tests:
- Development would not distort the settlement pattern or create urban sprawl, it would resolve the land between Epsom Road and land off Shere Road / Wix Hill, and would have low effect on the Green Belt purpose of checking urban sprawl;
 - Development would have a low effect on preventing towns merging, and would effectively act as infill between West Horsley and existing development off Shere Road/ Wix Hill;
 - Development would result in a low effect on safeguarding the countryside from encroachment - the site does not appear as being countryside, largely due to being located between the A246 and existing properties off Shere Road / Wix Hill. It would form a boundary to countryside to the east, and its eastern boundary would need to reflect the loose character of existing properties off Wix Hill. A combination of rising topography and vegetation structure results in this land having very limited visibility from the local or wider landscape;
 - Development would have negligible effects on preserving the setting and character of historic towns as it has no physical or visual relationship with West Horsley, or its Conservation Area, and;
 - Promoting urban regeneration is applicable as a general principle, and is not applied on a site-by-site basis.
- 4.25 Despite the GBCS already undertaking a macro-scale assessment of wider land parcels followed by the site-specific, micro-scale identification of individual PDAs, the LPA commissioned the production of additional Green Belt sensitivity mapping following an extraordinary meeting of the Council on 13th January 2014 and the establishment of a Local Plan Scrutiny Forum. This addendum work identified the entirety of parcel E4 as high sensitivity Green Belt which the Council has used to justify not undertaking any further assessment of the development potential of land to the west of Shere Road, West Horsley, despite its earlier identification as a PDA.

- 4.26 These representations and the accompanying Technical Note have demonstrated that the Council is unjustified in applying an additional 'macro scale' Green Belt sensitivity layer, when the GBCS had already considered whether wider parcels had an opportunity to accommodate development without undermining the NPPF Green Belt purpose tests. It is unsound for the Council to disregard this earlier evidence and the development potential of a site simply because a much later, 'macro-scale' sensitivity map has identified it as falling within a more sensitive wider parcel. This 'macro-scale' level of mapping cannot supersede much more detailed 'micro-scale' assessment work which identified certain PDAs in parcels which, perhaps being more sensitive overall than others, can nevertheless better accommodate development so as not to undermine the role of the wider parcel in Green Belt terms.
- 4.27 The Council has acted unsoundly in failing to consider the developability of sites identified as PDAs in the GBCS, this being their own evidence base, and recommended for further consideration. Instead, the Council has rejected certain sites on the basis of falling within a latter, 'macro scale' higher sensitivity parcel despite other proposed allocations, such as Normandy / Flexford, not only being located within a similar higher sensitivity parcel, but with the scale of development proposed covering a significant proportion of that parcel. This approach is inconsistent with paras. 84 and 85 of the NPPF, unevidenced and in order to be found sound, the Council must revisit those sites previously identified as PDAs in the GBCS to consider whether they could deliver housing in the short to medium term to allow the Council to reinstate a five year housing land supply and establish a more balanced housing strategy over the entirety of the Plan period.

Appendix 2 - Section 5 of 2017 Representations

5.0 Housing Strategy

5.1 These representations have focused upon soundness failures associated with the 2017 Proposed Submission Local Plan. Such soundness failures have resulted from the establishment of an unbalanced housing strategy which singularly fails to identify sufficient numbers of small to medium scale housing sites which are deliverable within the early years of the Plan period. Instead, the Plan both rejects a range of smaller scale housing sites without sufficient evidence or explanation whilst proposing the allocation of various strategic scale housing sites whose delivery is delayed and uncertain due to associated infrastructure delivery. This unbalanced housing strategy has resulted in:

- The Council failing to establish and maintain a five year housing land supply following adoption of the Plan due to an absence of sites capable of delivering new homes within the early part of the Plan period;
- The Council failing to positively address historic unmet housing need by disregarding the two year period 2013/15 despite its inclusion within the 2015 SHMA;
- The Council failing to assist neighbouring Local Authorities with addressing their unmet housing need under the Duty to Cooperate;
- Despite significant historic housing delivery shortfalls and chronic rates of affordability and household formation suppression, the Council failing to meet annualised housing need and instead proposing a lower housing target within the early years of the Local Plan at a time when new housing is needed most.

5.2 The Council clearly recognises the lack of allocated sites able to deliver new homes within the early part of the Plan period but we fundamentally disagree that *“whilst every effort has been made to maximise sustainable sites that are able to deliver in the first five years, there remains a significant shortfall when taking account of the deficit accrued since 2015 and the 20% buffer brought forward from later in the Plan period”* (2017 Housing Delivery Topic Paper, para. 4.13). Using the example of land to the west of Shere Road, West Horsley which is identified as a PDA within the GBCS, we will demonstrate that the Council has not made even the most basic effort to maximise the delivery of smaller scale, sustainable sites within the early years of the Plan period.

Reconsideration of Identified PDAs

5.3 Our earlier representations to the 2016 Proposed Submission Local Plan looked in considerable detail at the Guildford GBCS and the associated identification of PDAs (n.b. including land to the west of Shere Road being promoted by Dandara Ltd). These representations will not repeat a description of the assessment process undertaken by the GBCS to identify PDAs nor the associated sustainability work which is considered in detail in Section 4.0 of our earlier 2016 representations.

5.4 The 2017 Housing Delivery Topic Paper recognises that *“given the extent of Green Belt across the Borough (89%) and the lack of sufficient suitable and deliverable sites located outside the Green Belt, to not amend boundaries would lead to a significant undersupply of*

homes compared to the identified needs ...” (para. 4.39). For this reason, “... we consider it is necessary to consider the potential of each PDA regardless of its Green Belt sensitivity” (para. 4.41). The Council then conclude that “... if it were considered appropriate and sustainable to allocate further Green Belt sites to achieve additional early delivery, we would have done so to benefit Guildford’s draft Local Plan” (para. 4.14).

- 5.5 Despite this commitment to revisiting all PDAs identified within the original GBCS, the 2017 Proposed Submission Local Plan does not propose to allocate any additional Green Belt sites and instead reduces the number of new homes to be delivered on Green Belt land compared with the 2016 iteration. Having specific regard to the reassessment process undertaken for land located to the west of Shere Road, we will move on to consider three clear evidence base deficiencies that cumulatively result in a continued unevidenced and unsound rejection of the site and presumably similar PDAs:

(1) 2017 SA Update

- 5.6 The 2017 SA update assesses eight individual spatial strategies ranging from OAN plus 9.4% growth through to OAN plus 26.2% growth. Para. 4.48 of the 2017 Duty to Cooperate Topic Paper acknowledges that *“the SA concludes that there is no clear best performing or most sustainable option. Instead, there are trade-offs between competing objectives which need to be considered as part of the Local Plan process when determining our preferred spatial strategy”*. It is therefore clear that the SA does not consider that the addition of further housing sites into the Local Plan up to OAN plus 26.2% (including PDAs) would result in adverse impacts that would significantly and demonstrably outweigh the benefits.
- 5.7 Box 6.10 of the 2017 SA update considers there to be 31 reasonable options when considering Green Belt development around existing villages. However, the SA explains that *“... the remaining 22 sites (n.b. including land west of Shere Road) that are listed within Appendix E as having been identified as PDAs through the GBCS are ruled-out, i.e. it is a ‘given’, for the purposes of developing spatial strategy alternatives, that they should not be allocated”*. The vast majority of PDAs surrounding villages, being 22 out of the 31 ‘reasonable options’, are therefore automatically excluded from reconsideration when the 2017 SA update is reviewing spatial strategy alternatives.
- 5.8 Taking land to the west of Shere Road as an example, the site is not considered as a spatial strategy alternative within the 2017 SA update because it was considered as a ‘discounted site’ on pg. 541 of the 2016 LAA. There are two reasons provided by the LAA to justify land to the west of Shere Road being discounted despite being identified within the GBCS as a PDA. The first relates to the identification of ‘high sensitivity Green Belt’ within the GBCS which we will consider latterly whilst the second relates to *“our spatial strategy and site allocations have been considered through the SA and this site no longer accords with the proposed spatial strategy in the Local Plan”*.
- 5.9 There is an inherent and obvious contradiction within the SA and LAA evidence base. The 2017 SA update is acknowledging that all PDAs identified within the GBCS should be reassessed due to the significant housing shortfall within the early part of the Plan period alongside unmet housing need arising in adjacent Authorities. However, the extent of this

assessment for PDA land to the west of Shere Road is simply to refer back to the 2016 LAA which discounted the site due to it not according with the spatial strategy and site allocations considered through the 2016 SA – a spatial strategy which was unsound as unable to meet objectively assessed housing need. Using this rationale, it is impossible for such PDAs to be properly considered through the SA as they are automatically being excluded due to their rejection within the LAA for the very reason that they don't accord with the SA spatial strategy – a spatial strategy that they cannot be considered against due to automatically being discounted. How can the LAA reject a site as not according with the preferred spatial strategy if the SA which assesses spatial strategy options is not taking such sites into consideration?

- 5.10 This is an impossible 'catch 22' situation as the 2017 SA update commits to a reassessment of all PDA sites but cannot carry these out in any meaningful way as a number have already been automatically rejected within box 6.10 due to not according with the preferred 2016 SA spatial strategy, a spatial strategy the 2017 SA update is supposedly revisiting to independently and objectively identify opportunities for additional housing delivery for the short to middle term Plan period. When PDAs are automatically being rejected from consideration under the 2017 SA update's spatial strategy alternatives due to the conclusions of the 2016 LAA, this is clearly not a robust approach to optimising housing delivery given that *"the LAA has not been updated for the Regulation 19 Local Plan (2017) ..."* (2017 Housing Delivery Topic Paper) and is a rather pointless exercise.
- 5.11 The LAA has not been prepared using the methodology in the PPG as stated by para. 3.13 of the 2017 Housing Delivery Topic Paper as it has automatically rejected various PDAs based on a preconceived preferred spatial strategy. The fundamental purpose of the LAA is to independently identify sites and broad locations with potential for development; assess their development potential; and assess their suitability for development and the likelihood of development coming forward (para: 001, ref ID: 3-001-20140306). The LAA should not be prematurely rejecting sites from proper consideration due to a preconceived preferred spatial strategy that prevents all site options being considered through the SA.
- 5.12 We note that despite Box 6.10 automatically ruling-out 22 PDAs as explained above, they are considered from a sustainability perspective in appendix V of the SA. There are evident errors in this sustainability appraisal relating to land to the west of Shere Road including the site scoring red for recreation facilities and schools despite Henderson Playing Fields and Cranmore School both being circa 0.2 miles to the east (4 minute walk). The Council should revisit their 2017 SA update to ensure such errors are not included within the appendix V assessment work.

(2) GBCS – High Sensitivity Green Belt

- 5.13 Linked to the above, the second reason that the 2016 LAA gives for discounting land to the west of Shere Road is that the site is located within a latter macro-level GBCS high sensitivity Green Belt parcel. Our previous 2016 representations dealt with this point in detail within Section 4.0 and included a stand-alone Technical Note, prepared by specialist landscape and Green Belt consultancy Define, neither of which appear to have been taken into consideration by the Council.

- 5.14 We do however welcome the recognition within para. 3.9 of the 2017 Housing Delivery Topic Paper that the GBCS “... identifies potential development areas (PDAs) that could potentially be developed should there be insufficient land within the urban areas to meet identified needs, without harming the overall main purpose of the Green Belt”. It is clear within the GBCS that the whole purpose of identifying PDAs was to identify individual sites whose development would not harm the main purposes of the Green Belt as defined by para. 80 of the NPPF.
- 5.15 Our 2016 representations argued that it was entirely unjustified and unevidenced to discount land to the west of Shere Road within the 2016 LAA on the basis that despite being identified as a PDA within the GBCS – a site whose development would not harm the main purposes of the Green Belt – it fell within a wider macro-level high sensitivity assessment parcel. Detailed criticism of this approach is included in Section 4.0 of our 2016 representations and within the accompanying Define Technical Note. However, para. 4.40 of the 2017 Housing Delivery Topic Paper does attempt to explain and justify the Council’s approach in more detail:

“Whilst PDAs have been identified on the basis that they would not fundamentally harm the main purposes of the Green Belt, there would nevertheless be, in relative terms, more harm caused by allocating sites within land parcels assessed as contributing more towards the purposes of the Green Belt than those judged to be of lesser Green Belt value. In giving greater weight to the sensitivity of the Green Belt, we are have therefore sought to ameliorate the consequent impacts on the Green Belt as much as is reasonably possible”.

- 5.16 Again, we will not seek to replicate arguments already made within Section 4.0 of our 2016 representations nor the accompanying Define Technical Note. However, para. 4.40 of the 2017 Housing Delivery Topic Paper clearly demonstrates how the Council has failed to understand and consistently apply the Green Belt purpose tests established by para. 80 of the NPPF. Put simply, if a site falls within a ‘high sensitivity’ Green Belt parcel and makes a material contribution to that parcel then clearly it would be considered to perform strongly against purposes such as preventing sprawl and safeguarding the countryside from encroachment and would not have been identified as a PDA in the first place.
- 5.17 The very reason that such sites were identified as PDAs within the GBCS is that their future development would not harm the main purposes of the Green Belt as recognised within para. 3.9 of the 2017 Housing Delivery Topic Paper. Their latter inclusion within a wider, macro-level high sensitivity Green Belt parcel does not change this conclusion as the purpose tests the site has already been considered against do not fundamentally change as they originally would have included consideration of wider, strategic Green Belt functions.

(3) Cumulative Impact of Development

- 5.18 Pg. 36 of the 2017 Housing Delivery Topic Paper gives arbitrary consideration to the potential of allocating further PDAs for residential development within the 2017 Proposed Submission Local Plan. Para 4.158 considers that any additional allocations around the Horsleys would conflict with para. 14 of the NPPF:

“Given the scale of growth already planned to occur within the Horsleys, all of which is anticipated to occur within the first five years, we do not consider that further allocations (which would bring the total up to approximately 700 homes), also within the early part of the Plan period, are appropriate or sustainable. Additional growth within such a short period has the potential to overwhelm the existing community and create difficulties in integration. A significant level of development occurring quickly without a period of adjustment during which the new community can assimilate with the existing residents is likely to cause issues related to community cohesion. It is also more likely to have a negative impact on the perceived character of the area and cause a greater strain on local services and facilities as some of the wider planned new infrastructure is programmed to be delivered later in the plan period. For these reasons, the harm associated with providing more homes here is considered to significantly and demonstrably outweigh the benefits of doing so”.

- 5.19 There is no evidence provided to justify these conclusions and as we have previously demonstrated, box 6.10 of the 2017 SA update excluded the majority of PDAs on Green Belt land surrounding villages prior to alternative spatial strategies being developed. The SA has not therefore tested the sustainability impacts of delivering additional housing at the Horsleys although we do know that higher housing targets within Guildford Borough could be achieved without any adverse impacts significantly and demonstrably outweighing the benefits.
- 5.20 The justification for no additional PDAs surrounding the Horsleys being allocated for residential development is therefore considered to be unsound as unevidenced on the following basis:
- There is no justification for why the Horsleys are only able to accommodate a finite number of new homes and the specific adverse impacts that would arise should a higher figure be targeted;
 - It is difficult to understand how the Council considers that the Horsleys are unable to accommodate additional housing growth given that the 2016 iteration of the Local Plan proposed for allocation 138 homes across the Horsleys which have now been deleted. These additional 138 homes over and above the number now proposed in the 2017 Proposed Submission Local Plan raised no sustainability concerns;
 - Both the 2014 Guildford Borough Settlement Hierarchy and the LAA housing trajectory consider the Horsleys to comprise two distinct settlements for development management and housing monitoring purposes being East Horsley and West Horsley (north and south). It is unclear why the 2017 Housing Delivery Topic Paper is considering the ‘Horsleys’ as a single settlement;
 - As shown on the LAA housing trajectory, the Horsleys are cumulatively expected to accommodate less than 100 new homes per annum during the first five years of the Plan period and significantly less should they be treated as two individual settlements. This is not considered to be an unsustainable level of growth considering the range of shops, services and public transport modes provided within the Horsleys;
 - If there is considered to be a finite number of new homes that the Horsleys can sustainably accommodate, the Council should undertake an assessment of all PDAs to consider the most

sustainable sites to absorb this finite figure. This assessment has not taken place and is especially concerning given that land west of Shere Road was considered within the GBCS to be one of the most sustainable PDAs in the Horsleys;

- Whilst the Council do not expand on why additional housing would “... *overwhelm the existing community and create difficulties in integration*” (2017 Housing Delivery Topic Paper, para. 4.158), should such a concern be legitimate, the Council would be expected to consider how such an impact could be mitigated, such as providing community services on-site associated with development, rather than simply treating as a finite constraint. It is also unclear how such a concern can exist for the Horsleys but not for a proposed allocation such as Wisley airfield which will clearly overwhelm existing villages and attempts to establish a sizeable new community in an isolated countryside location;

- Similarly, whilst the Council focus on potential issues of social cohesion and integration, which are not evidenced, they do not consider the potential for social unrest should housing delivery continue to be suppressed with levels of affordability in one of the least affordable parts of the country continuing to worsen. There is no evidence that residents of the Horsleys would not welcome a ‘boost’ in housing supply as required by para. 47 of the NPPF given the suppressed nature of housing delivery over the past ten years in Guildford Borough;

- There is also no evidence that local services or facilities could not cope with additional growth given the good existing range of shops, services and public transport modes. The Council has again failed to undertake a balanced assessment of the benefits to the local economy and jobs market that could result from additional construction activity and new homes.

5.21 The Council has sought to arbitrarily reject proper consideration of the role that PDAs surrounding the Horsleys could play in supporting the delivery of much needed additional homes during the early part of the Plan period. The Council has provided no substantive evidence to explain why the Horsleys could not sustainably accommodate additional housing, especially as the settlements are due to accommodate 138 less homes than the 2016 Proposed Submission Local Plan. The justification is unevidenced and entirely without merit, with no proper consideration being given to whether demonstrable sustainability concerns exist and, if so, how the Local Plan could address these associated with mitigation, whether involving upgrading infrastructure or providing additional community facilities, associated with new development.

5.22 It is clear that allocating a PDA such as land to the west of Shere Road for residential development would not cumulatively result in an adverse impact that would significantly and demonstrably outweigh the benefits of increasing housing delivered during the early part of the Plan period.

Reliance on Large, Strategic Sites

5.23 In addition to focusing on the benefits that the identification of a greater number of small and medium sized housing sites could bring to the soundness and overall deliverability of the Local Plan, we will briefly consider the impacts of an over-reliance on a limited number of

large, strategic scale sites. Our 2016 representations considered in detail delivery, timing, infrastructure and viability concerns relating to a range of proposed large scale, strategic allocations and we will therefore focus solely on any relevant changes contained within the 2017 Proposed Submission Local Plan.

5.24 The 2017 Proposed Submission Local Plan continues to place great reliance on housing delivery from a limited number of large, strategic scale allocation sites including urban extensions to Guildford town, Ash and Tongham and the former Wisley airfield. We would raise the following soundness concerns for consideration by the Council and Inspector:

- We previously raised concerns regarding the inability of housing to be delivered on various strategic housing sites prior to the completion of associated strategic infrastructure improvements, particularly highways. Whilst we welcome the Council pushing completions associated with numerous strategic allocations to later in the Plan period (n.b. notwithstanding the impact this has had upon early years housing delivery), we remain concerned, having regard to Appendix 3 of the 2017 Transport Topic Paper, that completions are expected prior to the delivery of the necessary infrastructure. As an example, completions are expected on the two Guildford urban extension sites from 2022/23 despite SRN2, major improvements to the A3 through Guildford, not commencing until 2023/24 and not completing until 2027/28 by which time 550 new homes per site would have been completed. This is contrary to the request from Highways England that *“it is essential that the Local Plan provides the planning policy framework to ensure development does not come forward in advance of critical infrastructure”* (2017 Transport Topic Paper, para. 5.41);
- We also welcome the commitment of Highways England to deliver two RIS1 schemes which are critical to the delivery of the Local Plan, namely M25 junction / A3 Wisley interchange and M25 junction 10-16. We do however note that A3 improvements through Guildford are only being considered as ‘potential options’ subject to value for money tests being applied. We are unclear and request clarification from the Council of the implications should the A3 project not be taken forward by Highways England, or subject to delay, and how the Local Plan would deal with this given the delivery of the two urban extension sites being reliant upon improvements to the A3. This is critical given the recognition in para. 5.11 of the 2017 Transport Topic Paper that *“... the implementation of the three RIS schemes is required to be able to accommodate future planned growth both within and outside the Borough”*;
- There remain specific deliverability challenges associated with proposed strategic site allocations. As an example, the Slyfield Area Regeneration Project is entirely dependent upon the relocation of the existing sewerage treatment works and we would ask the Council and Inspector to satisfy themselves that prior to allocation, there is certainty regarding both an alternative location for the sewerage treatment works and firm timescales, including associated costs, for the relocation;
- We remained concerned regarding the Green Belt and ecological impact of proposed allocations and particularly Wisley Airfield including its impact on the SPA and Green Belt purposes with Elbridge Council noting *“we query whether this is the right location of this scale of growth. The fundamental aim of the Metropolitan Green Belt is ultimately to prevent the spread of London”* (2017 SA update, pg. 17).

Appendix 3 - Define GBCS Technical Note



DANDARA LTD

LAND OFF WIX HILL, WEST HORSLEY

TECHNICAL NOTE RELATING TO GREEN BELT AND COUNTRYSIDE STUDY

7 JULY 2016

1. Introduction

1.1. The technical note is in respect of land enclosed by Wix Hill, Epsom Road and Shere Road, hereafter referred to as 'the site' (see Figure 1). It sets out an overview of how the site has been regarded by Guildford Borough Council's Green Belt and Countryside Study.

2. Guildford Borough Council – Green Belt and Countryside Study

2.1. Guildford Borough Council has carried out a Green Belt and Countryside Study, which is structured into the following volumes, with an overview of how each volume relates to the site as follows (with emphasis placed on site specific references by underlining):

Volume I - Summary, Introduction and Background to the Study (February 2013)

2.2. This Volume introduces the Study and summarises the findings of Volume 2 and 3 (insofar as identifying the site as a Potential Development Area surrounding villages). It considers the larger parcels identified and, in respect of parcel E4, which the site is located within, states:

Land parcels D6, E4 and E5 provide opportunities to accommodate appropriate development without significantly compromising the purposes of the Green Belt.

Volume II - Green Belt and 'Countryside beyond the Green Belt' within the surroundings of the urban areas at Guildford, Tongham and Ash (October 2009)

2.3. This Volume focuses on the Green Belt surrounding Guildford, Ash and Tongham, but also considers the Borough wide land parcels and how they perform relative the purposes for including land in the Green Belt. The site is located in parcel E4, which is scored to relate to 3 of the 4 Green Belt purposes assessed.

Volume II Addendum (April 2014)

- 2.4. This addendum is an addition (not replacement) to Volume II, it re-considers the previous assessment of how land parcels performed in respect of Green Belt purposes, categorising land parcels as being low, medium or high sensitivity. It provides more detail relating to Potential Development Areas (PDA) in urban areas, via a schedule (appendix 7) and map (appendix 8), but does not refine PDAs in respect of the villages.

Volume III - Green Belt surrounding villages across the Borough (October 2011)

- 2.5. This Volume focuses on the Green Belt surrounding the Borough's villages, including West Horsley. It recognises, at paragraph 10.2, that the wider parcels scoring 3 and 4 in the Green Belt purposes assessment in Volume II if eliminated from further assessment for development potential would result in a number of villages not being considered further. Land parcels adjoining all villages would *therefore be considered in more detail*.
- 2.6. The more detailed assessment of West Horsley South takes place at pages 121-127, concluding that the *majority of the site is identified as a Potential Development Area (E4-B)*, with the assessment summarising the site as:

E4-B: E4-B is surrounded by defensible boundaries including hedgerows and treecover following the A246 Epsom Road to the north, hedgerows bordering Shere Road to the east, rising topography and hedgerows bordering residential properties at Wix Hill to the south and west of the PDA.

Volume IV - Insetting of villages from the Green Belt (April 2014)

- 2.7. This study focusses on the assessment of villages in respect of their appropriateness for being inset from the Green Belt designations, and if so, to which boundaries. *The detailed assessment of West Horsley South identifies the site surrounded by the extent of the perceived village area*, but excludes the site from being part of this village area, and the Green Belt inset boundary.

Volume V - Insetting of villages from the Green Belt (April 2014)

- 2.8. This study supplements the findings of the previous volumes to address, amongst other matters, the potential major expansion of villages. *The site is identified as a Potential Development Area (PDA) suitable for around 56 dwellings at page 32 with the PDA designation being illustrated at Appendix 9.*

Volume VI – Insetting of Gypsy and Traveller Sites (May 2014)

2.9. This study does not refer to the site or West Horsley.

3. Green Belt Assessment

3.1. Define has separately carried out an assessment of the site in respect of the purposes for including land in the Green Belt, and agree with the identification of the site as PDA. Our assessment confirmed that appropriate development on the site would:

- Not distort the settlement pattern or create urban sprawl, it would resolve the land between Epsom Road and land off Shere Road / Wix Hill, and would have low effect on the Green Belt purpose of checking urban sprawl;
- Have a low effect on preventing towns merging, and would effectively act as infill between West Horsley and existing development off Shere Road/ Wix Hill;
- Result in a low effect on safeguarding the countryside from encroachment - the site does not appear as being countryside, largely due to being located between the A246 and existing properties off Shere Road / Wix Hill. It would form a boundary to countryside to the east, and its eastern boundary would need to reflect the loose character of existing properties off Wix Hill. A combination of rising topography and vegetation structure results in this land having very limited visibility from the local or wider landscape;
- Have negligible effects on preserving the setting and character of historic towns as it has no physical or visual relationship with West Horsley, or its Conservation Area, and;
- Promoting urban regeneration is applicable as a general principle, and is not applied on a site-by-site basis.

3.2. We assessed that the site-specific features are wholly different from the typical performance of the wider Green Belt parcel in which the site is located (E4) in regard to its sensitivity to the Green Belt purposes. The majority of this wider parcel is open and rolling countryside, and is not adjacent, between, or wholly enclosed by urban features (housing or roads) which is evident for the site. The site is located on rising land that is well structured by housing and vegetation, and as a result has very limited visibility from the wider landscape, a point of detailed assessment highly relevant to understanding likely Green Belt effects, that the original Green Belt and Countryside Study identified (see 2.6 above), but

that the much more strategic Green belt sensitivity simply does not have the ability to recognise or appreciate.

4. Guildford Borough Council – Guildford Borough Proposed Submission Local Plan: Strategy and Sites

4.1. This Regulation 19 submission Local Plan allocates one small housing site (A37) at West Horsley South, as opposed to the three Potential Development Sites identified in the Green Belt and Countryside Study. West Horsley North has four housing sites being promoted (A38-41), with three of the four being consistent with the previous sites promoted as PDA.

4.2. In respect of West Horsley South, this is a dramatic change in strategy, seemingly led by the Green Belt sensitivity schedule and mapping that took place in the Addendum to Volume II of the Green Belt and Countryside Study. Paragraph 4.18 of the Guildford Topic Paper: Housing Delivery, makes this clear, by stating:

4.18 The draft Local Plan (2014) treated all PDAs as reasonable options for development regardless of the extent to which the land parcel within which it sits scored against Green Belt purposes (as shown on the sensitivity map). However, following the feedback from consultation and the new evidence base available, we have reconsidered how Green Belt is used as a constraint. The Proposed Submission Local Plan seeks to give weight to the sensitivity of the Green Belt parcel within which each PDA is located. Whilst PDAs have been identified on the basis that they would not fundamentally harm the main purposes of the Green belt, there would nevertheless be, in relative terms, more harm caused by allocating sites within land parcels assessed as contributing more to the purposes of the Green Belt than those judged to be of lesser Green Belt value. In giving great weight to the sensitivity of the Green Belt, we have therefore sought to ameliorate the consequent impacts of the Green Belt as much as is reasonably possible.

4.3. Such an approach places great weight on the methodology applied to the Green Belt sensitivity schedule to ensure that each potential development site is considered on a non-prejudicial basis to deliver sustainable development. It also requiring analysis beyond the simple Green Belt sensitivity schedule and map, as this exercise is naturally constrained in its accuracy by the scale of its parcelisation process, which contrasts with the more detailed site specific analysis that led to the identification of PDAs around villages in Volume III of the Green Belt and Countryside Study - as illustrated at 3.2 above.

4.4. I consider there to be two key criticisms of the Green Belt sensitivity mapping as the central tool to inform the housing allocations, as follows:

1. The precedent studies that informed the methodology pre-date the NPPF, dating back to 2004 (Merseyside), 2006 (Cambridge), 2006 (Purbeck) and 2009 (Coventry). Notably, the most recent Green Belt Study identified (and highlighted as an influence on this study - Coventry 2009) has been replaced by a different methodology, with a different approach to its land parcelisation and also its conclusions (LUC 2015). Green Belt Review methodology has been refined since the publication of the NPPF and has become more sophisticated, largely as it is recognised that such studies do influence and shape the directions of sustainable growth, and a degree of sophistication is required to create a robust approach. The scoring mechanism used in the assessment is very simplistic and unsophisticated (either a 0 or 1 point per purpose), as is the conclusion in respect of whether a parcel is low, medium or high sensitivity (for example E4 scores 3/4, whilst E5 scores 4/4 yet both are identified as high in sensitivity terms). This approach contrasts with the recent Warwickshire / Coventry approach, which has a more complex and extensive scoring mechanism (summary scores being out of 20), creating a more detailed, robust and credible analysis, resulting in conclusions that have a far more sophisticated basis.

2. The parcelisation approach adopted is medium to large scale, and this scale has to strike a balance between the pragmatics of an overly complex report, with the accuracy implications of placing potentially sustainable and lower sensitivity sites within land parcels that are naturally of much higher sensitivity to Green Belt purposes. This has most certainly been the case in respect of land promoted by Dandara Ltd within parcel E4. This land is surrounded by built development (as recognised within Volume IV of the Study) and its sensitive development would not result in urban sprawl or countryside encroachment in the same way as the wider parcel, and performs equally in these respects as the allocated housing sites A38-41. Moreover, a detailed assessment on the effects of change on Green Belt purposes should not change its detailed conclusions simply because it is located in a larger land parcel, that because it has land within it that has a very different performance against Green Belt purposes, somehow becomes more sensitive to change. This is counter-intuitive and lacking robustness.

4.5. In respect to the site, the Proposed Submission Local Plan: Strategy and Sites document, therefore ignores the previous study that identified the site as PDA.

Our studies agreed with this PDA allocation, and identified the site specific features to be wholly different from those found within the wider parcel (E4), and to similarly have a very different sensitivity to the purposes for including land in the Green Belt.

- 4.6. Moreover, Guildford Borough Council have not been consistent in how the Green Belt sensitivity mapping has informed their decision-making. Land at Normandy / Flexford (Policy A46) was only partially identified as PDA, and has been identified as being land of high sensitivity to the Green Belt, but has subsequently been allocated in the Proposed Submission Local Plan: Strategy and Sites document for the development of 1100 dwellings. Furthermore, this housing allocation occupies almost the entire extent of Green Belt parcel H12, which is of high Green Belt sensitivity. This Green Belt assessment therefore applies accurately to the entirety of this housing site as being of high sensitivity to Green Belt purposes, and it cannot be accurately claimed (as it can for this site and Green Belt parcel E4) that the difference in scale and performance of the wider Green Belt parcel and the site itself has distorted the site's Green Belt sensitivity and subsequent judgement of its development credentials.
- 4.7. In summary, the R19 consultation places great weight on the Guildford Borough Green Belt and Countryside Studies, and its conclusions are directly influenced by the Green Belt sensitivity schedules and related map found in the Addendum to Volume II, and not the detailed assessment work on the Potential Development Land at Volume III. The methodology employed to create the Green Belt sensitivity mapping, is however, very basic in nature, is informed by pre-NPPF methodologies (the most recent of which has already been replaced) and as a result does not provide a robust, credible and sufficiently sophisticated approach to rely on in so strongly shaping the growth and housing allocations of the Borough. The disregarding of the findings of a site-specific detailed exercise due to an unsophisticated large-scale parcelisation study is not a credible or robust basis to remove the site's allocation. It cannot be credible to undertake a detailed study recommending the site's virtues for potential development, then subsequently remove this allocation on the basis of a far less detailed study, particularly where other housing allocations have proceeded on site's of greater sensitivity to Green Belt purposes.

Appendix 4 - Section 6 of 2016 Representations

6.0 Housing Strategy

- 6.1 In order to be found sound, the emerging proposed submission Local Plan must be shown to be justified having regard to para. 182 of the NPPF being “... *the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence*”. Furthermore, it must also be shown to be positively prepared, “... *based on a strategy which seeks to meet objectively assessed development and infrastructure requirements*”.
- 6.2 As we have demonstrated elsewhere in these representations, the Council has consistently failed to deliver sufficient numbers of new homes to meet the former South East Plan housing target of 322 dpa with para. 4.169 of the ‘*Housing Delivery*’ Topic Paper (2016) recognising that “*for the last seven years, completions have been less than 300 homes per year*”. Furthermore, housing completions over the first five years of the new Local Plan period (2013-18) are expected to be below the 693 dpa required to meet OAN resulting in a cumulative shortfall of minus 2,019 units. This pattern of consistent under-delivery of housing has resulted in a significant worsening of affordability within Guildford Borough, depressing household formation rates and resulting in an Authority where “*affordability pressures in the West Surrey market are severe, with lower quartile house prices over ten times the annual income of young households*” (2015 SHMA, para. 7.45).
- 6.3 There is strong evidence that the major pressures facing Guildford Borough surround historically depressed rates of housing delivery which have fed into an unbalanced housing market where the increasingly limited housing stock is unaffordable for the majority of existing and future residents. The new Local Plan provides an opportunity for the Council to proactively address this historic undersupply of housing by accelerating housing completions over the early to middle part of the Plan period in direct response to acute housing need and affordability barriers. However, the housing and spatial strategy proposed by the Council is not currently able to achieve this principal policy objective.

Housing Strategy – Reliance on Large, Strategic Sites

- 6.4 As can be seen from Table 1 of the proposed submission Local Plan, the Council is proposing to allocate a number of large-scale, strategic development sites which, alongside other allocations and sources of housing supply, will allow the Council to meet its housing target of 13,860 new homes over the period 2013-33 excluding any Duty to Cooperate obligations. These large-scale, strategic development sites will deliver circa 7,140 new homes or just over 50% of the total comprising:
- 3,940 new homes as part of urban extensions to Guildford town;
 - 2,100 new homes at the former Wisley Airfield;
 - 1,100 new homes as part of Normandy and Flexford village expansion.
- 6.5 However, as can be seen from the housing trajectory produced on pg. 20 of the LAA, none of these large-scale, strategic sites are expected to begin delivering any new housing until at least 2021/22. There is thus an obvious discord between a Local Plan which, in line with NPPF and PPG guidance, should be looking to reinstate a five year housing land supply on adoption, especially given historic under-supply of housing and associated issues of

affordability, and a housing strategy where over 50% of supply is reliant on longer term, large-scale strategic sites despite their being alternative / additional sites available. The ‘*Housing Delivery*’ Topic Paper explains why housing on these sites cannot come forward earlier:

Guildford Urban Extensions – Both Blackwell Farm and Gosden Hill Farm require significant improvements to strategic highways infrastructure to facilitate development for new homes. Gosden Hill Farm is required to deliver a new railway station at Guildford East (Marrow) in addition to a new vehicular access off the A3 which must be planned in conjunction with wider Highways England works whilst Blackwell Farm requires an access off the A31 with ongoing work requiring the potential delivery of a new Guildford West (Park Barn) railway station;

Former Wisley Airfield – This site also requires significant improvements to strategic highways infrastructure including upgrading of the A3; a through vehicular link between the A3 Ockham interchange and Old Lane; as well as a series of improvements to the existing highway network including the A3 / M25 junction, Ripley High Street and A3 on-slip;

Normandy / Flexford – Whilst this site, unlike the Guildford urban extensions and the former Wisley Airfield is not dependent upon A3 infrastructure timescales, the quantum of development proposed in an otherwise rural part of the Borough is reliant upon a number of strategic infrastructure improvements including a new local centre; secondary school; SANGS and highway improvements that will delay the delivery of any future housing.

- 6.6 Para. 4.117 of the ‘*Housing Delivery*’ Topic Paper acknowledges that “*the Plan is heavily reliant on the delivery of larger strategic sites to meet OAN, the delivery of which are linked to the necessary improvements to the A3 (with the exception of North Street and Normandy / Flexford)*”. Para. 4.130 goes further and suggests that the Guildford urban extensions and Wisley Airfield, despite being shown as delivering new homes from 2021/22 in the LAA housing trajectory, will be unable to deliver new homes during the five year monitoring period following adoption of the Plan due to dependency on A3 infrastructure timescales – “*the delivery of this site [Normandy / Flexford] is not dependent on A3 infrastructure timescales, and can start to deliver within the first five years following adoption of the Local Plan*”.
- 6.7 Para. 4.5 of the ‘*Transport*’ Topic Paper (2016) states that “*existing road and parking infrastructure is already inadequate or under pressure and would worsen with the planned development ... i.e. A3 and M25 and in particular the A3/M25 junction area*”. We also know from the evidence base, including para. 4.117 of the ‘*Housing Delivery*’ Topic Paper referred to above, that the delivery of the large-scale, strategic housing sites is explicitly linked to, and reliant upon, necessary improvements to the strategic highway network and particularly the A3.
- 6.8 Having regard to Appendices 3 and 4 of the ‘*Transport*’ Topic Paper, and taking Wisley Airfield as an example, it is evident there is significant uncertainty regarding timescales and funding associated with the delivery of strategic infrastructure improvements required to facilitate the delivery of the draft allocation. To allow the delivery of new homes on the

Airfield, the following strategic transport infrastructure improvements are required associated with the A3 / M25 junction; A3 capacity; site accesses; bus network improvements; and cycle network improvements:

- (1) SRN3 – M25 Junction 10 / A3 Wisley Interchange ‘Road Investment Strategy’ – this is shown as being an ‘anticipated’ improvement costing £100-250 million and funded by Highways England and developer contributions. The notes suggest that development at Wisley Airfield would be required to at least fund an ‘interim’ improvement if it is to come forward ahead of the full SRN3 works;
- (2) SRN9 and SRN10 – Northbound and southbound slip roads at A247 Clandon Road – this is shown as being an ‘anticipated’ improvement costing £20 million in total and funded in full associated with the development of Wisley Airfield;
- (3) LRN7 - Interventions to address potential highway performance issues resulting from development at the former Wisley Airfield site – this is shown as being an ‘anticipated’ improvement costing £25 million and funded in full by developer contributions associated with the development of Wisley Airfield. The notes suggest that the full scope and cost has yet to be determined and will be confirmed as part of any future Transport Assessment;
- (4) BT3 – significant bus network improvements serving the former Wisley Airfield site – this is shown as being an ‘anticipated’ improvement with the cost to be confirmed. The notes make clear that *“required as part of bus improvements for the site in perpetuity to meet minimum sustainability criteria”*;
- (5) AM3 – off-site cycle network improvements serving the former Wisley Airfield site - this is shown as being an ‘anticipated’ improvement with the cost to be confirmed. The notes make clear that this is *“required to meet minimum sustainability criteria”*.

6.9 As the Council notes in para. 4.117 of the ‘Housing Delivery’ Topic Paper, *“the Plan is heavily reliant on the delivery of larger strategic sites to meet OAN, the delivery of which is linked to necessary improvements to the A3 (with the exception of North Street and Normandy Flexford”*. This strategy is however a conscious choice by the Council who have chosen to exclude from further consideration previously identified PDAs. Having regard to the ‘Transport’ Topic Paper, informed by the ‘Guildford Borough Transport Strategy’ (2016) and the Surrey County Council ‘Strategic Highway Assessment Report’ (2016), Dandara Ltd has significant concerns regarding delivery, funding and anticipated completion rates associated with the large-scale, strategic allocation sites.

Delivery of Strategic Infrastructure

6.10 One of the key tests of soundness for the emerging Guildford Borough Local Plan as set out at para. 182 of the NPPF is that the policies are ‘effective’ whereby *“... the Plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities”*. Having reviewed the evidence base, the timescales associated with the delivery of strategic transport infrastructure improvements required to support a number of the proposed large-scale, strategic housing allocations are currently unknown, as are the total costs and sources of funding.

6.11 Given the scale of strategic transport infrastructure improvements required, such as A3 / M25 junction improvements, it is imperative that the Council can satisfy a future Inspector

that there is a sufficient level of certainty of delivery, funding and timescales in order to inform assumptions regarding housing delivery. The proposed submission draft Local Plan is proposing that just over 50% of total housing delivery is associated with large-scale, strategic housing allocations, many of which can only be brought forward if significant improvements to strategic transport infrastructure are delivered. It is therefore imperative that the Council can demonstrate that such improvements are deliverable and will be in place in conjunction with assumptions made regarding delivery of new homes. At present, Appendix 4 of the 'Transport' Topic Paper simply suggests that such improvements are 'anticipated' when they need to be firm commitments if the proposed housing strategy in the Local Plan is to be found sound.

Assumptions Regarding Housing and Infrastructure Delivery

- 6.12 Appendix 3 of the 'Transport' Topic Paper demonstrates the relationship between the timescales associated with the delivery of strategic transport infrastructure and the delivery of new homes on large-scale, strategic allocation sites. The Council assume that delivery of strategic transport improvements, necessary to allow new homes to be delivered on a number of the large-scale, strategic allocation sites, will take place in parallel with the delivery of new homes. For example, works to SRN9, SNR10 and LRN7 associated with the development of Wisley Airfield are anticipated to commence 2021/22, the same year as the scheme delivers its first new homes. It is therefore imperative that the Council provides a clear evidence base that demonstrates that the strategic transport network can accommodate additional demand from large-scale sites whilst such improvement works are on-going and that there would be a commitment from the market to deliver.
- 6.13 At present, it is unclear the quantum of new homes that the strategic transport network can accommodate whilst the works are on-going and not completed. An obvious example relates to the delivery of SRN9 and 10 which provide for northbound and southbound slip road accesses onto the A247 at Clandon Road for the use of future residents of the Wisley Airfield site. These works are shown in Appendix 3 as being undertaken during the period 2021/22 to 2027/28. However, by 2027/28, which is the latest date by which the works are anticipated to be completed, Wisley Airfield is projected to have delivered 650 new homes. It is therefore unclear whether the Council is able to commit to Wisley Airfield delivering 650 new homes by 2027/28 if all or a proportion of associated vehicular movements are reliant upon the delivery of SRN9 / 10, or other such strategic transport improvements, the timescale of which is currently uncertain and could be as late as 2027/28.

Viability

- 6.14 The PPG states that Local Plans should "... pay careful attention to providing an adequate supply of land, identifying what infrastructure is required and how it can be funded and brought on stream at the appropriate time; and ensuring that the requirements of the Plan as a whole will not prejudice the viability of development" (ref. ID: 12-018-20140306).
- 6.15 We have demonstrated above for Wisley Airfield, as taken from the 'Transport' Topic Paper and of equal relevance to other proposed large-scale, strategic allocation sites, that there is a significant financial burden associated with the delivery of strategic transport

improvements which are necessary to allow the development to come forward. Having regard to Appendix 4 of the Topic Paper, and excluding as yet unknown contributions towards public transport improvements, it is anticipated that Wisley Airfield would fund at least £145 million of strategic transport improvements (£100 million for SRN3; £20 million for SRN9&10; and £25 million for LRN7). Assuming Wisley Airfield delivers 2,100 new homes as per Table 1 of the proposed submission Local Plan, this would require a contribution of circa £69,000 per unit toward strategic transport improvements alone, excluding any other contributions.

6.16 In addition to financial contributions towards the delivery of strategic transport improvements, the large-scale, strategic allocations are also expected to contribute towards the delivery of *inter alia* the following:

- Localised retail;
- Social and community facilities;
- Primary and secondary education;
- Health facilities;
- Sport and leisure facilities;
- SANGS;
- Open Space;
- Pedestrian and cycle networks;
- Biodiversity and habitat enhancements;
- Affordable housing;
- Employment facilities.

6.17 In order to ensure that the emerging Local Plan is able to satisfy the NPPF ‘effective’ test of soundness in terms of being deliverable over its period, the Council must undertake a robust and thorough viability assessment to demonstrate that the proposed allocations are able to fund the significant range of strategic and localised infrastructure and social and community service improvements which are required in order to ensure the proposed allocations can be sustainably delivered.

6.18 This assessment of viability is particularly important for a site such as Wisley Airfield which not only cannot come forward without necessary improvements to strategic transport infrastructure as highlighted above but also requires the delivery of a raft of associated social and community facilities and sustainable transport improvements given its isolated location. Furthermore, given the chronic need for affordable housing identified within the SHMA and considered elsewhere in these representations, it is also important to ensure that viability considerations do not impact upon the ability of such schemes to deliver much needed affordable housing.

Projected Completions

6.19 These representations have previously raised concerns regarding housing being delivered on large-scale, strategic allocation sites immediately following the commencement, rather than substantive completion, of associated improvements to strategic transport infrastructure which is required in conjunction with new development.

6.20 However, concerns are also raised in respect of projected housing completions shown within the housing trajectory set out on pg. 20 of the LAA. There are two principal concerns that the Council should take into consideration:

- (i) **Cumulative Completions** – The Local Plan housing delivery strategy is structured in such a way that significant numbers of new homes are expected to be delivered in the latter part of the Plan period associated with the delivery of a small number of large-scale, strategic allocations. During the last five years of the Plan period, the Council is expecting to deliver between 1,136 and 1,260 housing completions per annum. Given that the Council has not delivered over 500 new homes during any year over the past decade (2006/16), it is imperative that the Authority is able to demonstrate that the housing market is able to absorb this number of completions which are significantly in excess of the OAN of 693 dpa. This unevidenced completion rate is a further indicator of the imbalance of the Council’s proposed housing strategy which is over reliant on large-scale, strategic allocations which deliver later in the Plan period compared with a more equitable spread of small, medium and large scale sites which are able to deliver a more balanced completion rate, closer to assessed OAN;
- (ii) **Total Completions** – The Council project that the large-scale, strategic allocation sites are each capable of delivering up to 270-290 new homes per year. The Council should provide evidence, based on schemes elsewhere in the south-east of a comparable scale, that such rates of delivery are achievable, given the associated infrastructure burdens accruing to the sites, and the potential for three large-scale, strategic sites being expected to deliver, and the market support, in excess of 200 new homes per annum each, simultaneously during the last five years of the Plan period (Gosden Hill, Blackwell Farm and Wisley Airfield).

Housing Strategy – Conclusions

6.21 The proposed submission Local Plan is heavily reliant on a small number of large-scale, strategic housing allocation sites to deliver their housing target. The majority of these new homes cannot be delivered until the completion of a range of strategic transport improvements, being 2021/22 at the earliest. This has resulted in a housing strategy that is unable to reinstate a five year housing land supply following the adoption of the Plan due to the later delivery of housing associated with the proposed allocation of large-scale, strategic housing sites. This is a conscious choice by the Council having chosen not to assess previously identified PDAs in any further detail.

6.22 Furthermore, and having regard to Table 1 of the proposed submission Local Plan, over 50% of the new homes to be delivered between 2018 and 2033 are contained within four large-scale strategic allocation sites (Gosden Hill Farm, Blackwell Farm, Wisley Airfield and Normandy / Flexford). These sites all rely on the delivery of strategic transport improvements which are currently uncertain in respect of delivery, timescales and cost. There is a significant risk that the Council is proposing to adopt a housing delivery strategy which is overly reliant on large-scale, strategic sites which are fundamentally tied to the delivery of transport infrastructure which is inherently uncertain. Furthermore, the majority

of these strategic transport improvements are intended to be partly or fully funded by the developments, raising significant concerns about viability.

- 6.23 The Council is aware from its evidence base that past records of under-delivery of housing has resulted in a depressed housing stock, causing rising unaffordability and suppressed household formation rates. The priority of the emerging Local Plan, embodied within the housing strategy, should therefore be to ensure that sufficient housing is delivered during the early part of the Plan period in order to immediately address past shortfalls and accord with the requirement of para. 47 of the NPPF to boost significantly housing delivery. Instead, the Council is proposing a housing strategy that is unable to reinstate a five year housing land supply or positively address past housing shortfalls due to over-reliance on a small number of large-scale, strategic allocations which are unable to be delivered until at least 2021/22 due to associated and uncertain strategic transport improvements.
- 6.24 The Plan is not considered to meet the 'positively prepared', 'justified' or 'effective' tests of soundness as it does not meet objectively assessed housing need within the early part of the Plan period; is not the most appropriate strategy when considered against alternatives; and is not deliverable over the Plan period. Instead, the Council should consider allocating a larger number of small and medium scale sites, such as revisiting PDAs previously identified in the Green Belt and Countryside Study, in order to ensure that a sufficient quantum of homes are able to be delivered in the earlier part of the Plan period in order to reinstate a five year housing land supply and to reduce over-reliance on the delivery of complex, costly and uncertain major strategic transport improvements.
- 6.25 The Council suggest at para. 4.171 of their '*Housing Delivery*' Topic Paper that it is not possible to meet short term housing need without developing many high sensitivity Green Belt sites. However, as is the case with land off Shere Road in West Horsley, such small to medium scale sites are available, have been identified as PDAs within the Green Belt and Countryside Study and are able to deliver new homes in the early part of the Plan period. As can be seen from Table 2 of the Sustainability Appraisal (SA) Non-Technical Summary (2016), the Council has not considered an Option which looks to increase housing delivery on Green Belt sites surrounding villages – for example, housing delivery numbers for the Horsleys remain at 445 in all eight Options – and therefore do not have the evidence base to demonstrate that earlier rates of housing delivery are not achievable.

Appendix 5 - Section 4 of 2017 Representations

4.0 Five Year Housing Land Supply

4.1 Para. 47 of the NPPF states that to boost significantly the supply of housing, Local Planning Authorities should *inter alia* identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements. The 2017 Proposed Submission Local Plan is not currently sound due to failing the 'effective' and 'consistent with national policy' tests of soundness, being unable to establish a five year housing land supply following adoption.

4.2 Our assessment of the 'policy on' five year housing land supply position is based upon the housing trajectory set out on pg. 8 of the 2017 LAA addendum. There are four separate iterations of this calculation:

(a) Applying Plan Period 2013-34 (OAN annualised) – Maintaining the base date of the 2015 SHMA as explained in Section 2.0 of these representations with a one year extension of the Plan period to ensure a minimum fifteen year term post adoption. This iteration will annualise the objectively assessed housing need across the Plan period;

(b) Applying Plan Period 2013-34 (OAN staggered as per Policy S2) - Maintaining the base date of the 2015 SHMA with a one year extension of the Plan period to ensure a minimum fifteen year term post adoption. This iteration staggers objectively assessed housing need to allow for greater levels of housing delivery over the latter part of the Plan period as per Local Plan Policy S2;

(c) Applying Plan Period 2015-34 (OAN annualised) – Accepting the amended Plan period set out within the 2017 SHMA addendum. This iteration will annualise the objectively assessed housing need across the Plan period;

(d) Applying Plan Period 2015-34 (OAN staggered as per Policy S2) - Accepting the amended Plan period set out within the 2017 SHMA addendum. This iteration staggers objectively assessed housing need to allow for greater levels of housing delivery over the latter part of the Plan period as per Local Plan Policy S2.

4.3 Please note that whilst this section of the representations uses the OAN of 654 dpa as concluded by the 2017 SHMA addendum as the basis of calculating five year housing land supply, this in no way infers our acceptance of this figure as per the significant deficiencies identified within the methodology as explained in Section 2.0 of these representations.

4.4 The first principal difference between the scenarios focus on whether the base date of the Plan is taken as 2013/14 as recommended by the original 2015 SHMA or 2015/16 as per the 2017 SHMA addendum. The second principal difference is whether OAN is annualised at a constant 654 dpa or is staggered as being suggested in Policy S2 of the 2017 Proposed Submission Local Plan to allow proportionally greater housing delivery during the latter part of the Plan period.

4.5 We concur with the Council that it is appropriate to apply a 20% buffer to any five year housing land supply calculation as per para. 47 of the NPPF on the basis that *“for the last nine years, completions have, in all but one year, been less than 300 homes per year”* (2017

Housing Delivery Topic Paper, para. 4.203). As recommended by PPG, we will also aim to ensure that any historic unmet housing need is included within the next five year monitoring period given that *“Local Planning Authorities should aim to deal with any undersupply within the first five years of the Plan period where possible. Where this cannot be met in the first five years, Local Planning Authorities will need to work with neighbouring Authorities under the Duty to Cooperate”* (para: 035, ref ID: 3-035-20140306).

- 4.6 We will calculate the five year housing land supply position from 2019/20 being the anticipated date of adoption of the Local Plan and will follow the general methodology set out by the Council on pg. 46 of the 2017 Housing Delivery Topic Paper.

Historic Housing Shortfall

- 4.7 The 2015 SHMA assessed objectively assessed housing need for Guildford Borough from a base date of 2013/14. Known housing completions over the four year period from 2013/14 to 2016/17 are tabulated on pg. 44 of the 2017 Housing Delivery Topic Paper which, coupled with two additional years of pre-adoption housing delivery estimates from 2017/18 and 2018/19 set out within the 2017 LAA addendum, provide the following delivery rates set against the 2017 SHMA addendum OAN of 654 dpa:

2013/14 = 137 (- 517);

2014/15 = 242 (- 412);

2015/16 = 381 (- 273);

2016/17 = 297 (- 357);

2017/18 = 310 (- 344);

2018/19 = 309 (- 345).

Total Delivery = **1,676 (- 2,248)**.

- 4.8 The total housing requirement over the six year pre-adoption Plan period assuming a 2015 SHMA base date of 2013/14 is **3,924 homes** (2017 SHMA addendum OAN of 654 dpa x 6). The total number of homes delivered in Guildford Borough over this six year period was **1,676** giving an accumulated shortfall of **-2,248**. Having regard to the PPG, this accumulated historic shortfall should be dealt with within the first five years of the Plan period following adoption being 2019/20 to 2023/24. This shortfall will be applicable for five year housing supply calculation scenarios (a) and (b) which use the 2015 SHMA base date of 2013/14.
- 4.9 For scenarios (c) and (d), the Plan period base date is shortened to 2015/16 as per the 2017 SHMA addendum. This would reduce the number of new homes required during the four years pre-adoption of the Plan to **2,616** (2017 SHMA addendum OAN of 654 x 4). The total number of homes delivered in Guildford Borough over this four year period was **1,297** giving an accumulated shortfall of **- 1,319**. This shortfall will be applicable for five year housing supply calculation scenarios (c) and (d) which use the 2017 SHMA addendum base date of 2015/16.

Housing Supply

- 4.10 'Policy on' housing supply over the five year period 2019/20 to 2023/24 following adoption of the Local Plan is shown within the 2017 LAA housing trajectory as comprising a total of **3,582** homes. The five year housing land supply calculation of the four individual scenarios is outlined below:

Scenario (a) – 2013/14 Base Date with OAN Annualised

Requirement over five years $(654 \times 5) = 3,270$;

Deficit over six year period 2013/14 to 2018/19 = 2,248;

Requirement plus deficit $(3,270 + 2,248) = 5,518$;

Requirement plus deficit plus 20% $(5,518 \times 1.2) = 6,622$;

Housing supply = 3,582 (2019/20 to 2023/24);

Five year housing land supply $(6,622 - 3,582) = -3,040$ (2.7 years).

Scenario (b) – 2013/14 Base Date with OAN Staggered as per Policy S2

Requirement over five years = 2,400 (450 dpa for 2019/21 and 500 dpa for 2021/24);

Deficit over six year period 2013/14 to 2018/19 = 2,248;

Requirement plus deficit $(2,400 + 2,248) = 4,648$;

Requirement plus deficit plus 20% $(4,648 \times 1.2) = 5,578$;

Housing supply = 3,582 (2019/20 to 2023/24);

Five year housing land supply $(5,578 - 3,582) = -1,996$ (3.2 years).

Scenario (c) – 2015/16 Base Date with OAN Annualised

Requirement over five years $(654 \times 5) = 3,270$;

Deficit over four year period 2015/16 to 2018/19 = 1,319;

Requirement plus deficit $(3,270 + 1,319) = 4,589$;

Requirement plus deficit plus 20% $(4,589 \times 1.2) = 5,507$;

Housing supply = 3,582 (2019/20 to 2023/24);

Five year housing land supply $(5,507 - 3,582) = -1,925$ (3.3 years).

Scenario (d) – 2015/16 Base Date with OAN Staggered as per Policy S2

Requirement over five years = 2,400 (450 dpa for 2019/21 and 500 dpa for 2021/24);

Deficit over four year period 2015/16 to 2018/19 = 1,319;

Requirement plus deficit $(2,400 + 1,319) = 3,719$;

Requirement plus deficit plus 20% $(3,719 \times 1.2) = 4,463$;

Housing supply = 3,582 (2019/20 to 2023/24);

Five year housing land supply $(4,463 - 3,582) = -881$ (4.01 years).

- 4.11 As can be seen from the above calculations, the 2017 Proposed Submission Local Plan is not in accordance with para. 47 of the NPPF and the 'effective' and 'consistent with national policy' tests of soundness by failing to establish and maintain a five year housing land supply following adoption of the Local Plan. Subject to the methodology applied, the Local Plan is only able to identify between 2.7 and 4.01 years of housing land supply. Even applying the Council's preferred 'policy on' methodology which uses a later base date of 2015/16 and establishes a lower housing target for the early Plan period, only a maximum of 4.01 years supply can be identified.
- 4.12 Section 5.0 of these representations will demonstrate that many of the soundness failures associated with the 2017 Proposed Submission Local Plan surround an absence of small to medium scale allocations deliverable within the early to middle part of the Plan period which would increase short term housing delivery without reliance upon the completion of strategic infrastructure improvements.