

# MATTERS AND ISSUES FOR EXAMINATION PART 1

GUILDFORD BOROUGH LOCAL PLAN: STRATEGY AND SITES

SARA SWEENEY, KITEWOOD ESTATES LTD  
85 GRACECHURCH STREET  
LONDON EC3V 0AA

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## INTRODUCTION

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Kitewood Estates Ltd ('Kitewood') control 3.6ha at Westwood Lane, Normandy which forms part of a wider strategic site known as 'Land to the south of Normandy and north of Flexford' and 13.8ha at Sunnybrook Farm, Ash Green.

These sites mentioned above are not proposed for allocation in the plan and we have submitted representations promoting the sites at earlier stages in the plan-making process. However, we understand that the purpose of the Examination is to consider the soundness of the submitted plan, not to consider sites that have not been allocated ("omission sites").

Our response to the Matters and Issues for Examination Part 1 is focused on Matters 2, 3, 4, 5 and 9.

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

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### ***Are the calculations contained in the West Surrey SHMA Guildford Addendum Report an appropriate basis for establishing the OAN for Guildford?***

The 'West Surrey Strategic Housing Market Assessment: Guildford Addendum Report 2017' (March 2017) updated the 2015 report. The update considered the DCLG 2014-based household Projections that were published in July 2016. However, the Addendum relates solely to Guildford and not the wider HMA, the impact on the OAN for the HMA is therefore not evident.

The housing White Paper *Fixing our broken housing market* set out a comprehensive strategy to tackle housing delivery failures. This comprised planning for the right homes in the right places, building homes faster, diversifying the market and helping people now. Further detail on a number of these reforms was set out in *Planning for the right homes in the right places* in September 2017.

On 5<sup>th</sup> March 2018 the Ministry of Housing, Communities and Local Government published the Draft revised National Planning Policy Framework for consultation which provides a clearer steer of the Government's intent. The consultation period will end today, 10<sup>th</sup> May 2018.

The Draft revised National Planning Policy Framework promotes a standard approach for calculating the OAN and Guildford Borough's OAN would arguably be significantly higher if the standard approach was taken. Guildford Borough submitted the Local Plan for Examination before the standard approach becomes effective. However, it cannot be ignored that this country does not have enough homes in the right places. Guildford is highly accessible to London and is one of the least affordable places to live in the South East of England.

It is understood that international migration is a significant component of population growth in Guildford and GL Hearn conclude that the 2014- based SNPP for Guildford Borough are technically sound (para 3.27). We agree that the Household projections should not be used uncritically, and that based on the analysis much of the international migration is not EU related and any changes resulting from Brexit can be revisited as part of a Local Plan review.

Notwithstanding the issue of London's unmet housing need and the Duty to Co-operate, it is crucial that new homes are delivered in areas where there is high demand. Guildford Borough is in commuter distance to London and this has a considerable impact on the housing market in terms of both the demand for housing and price (the affordability). In simplistic economic terms, if more homes are delivered then the absolute minimum need, then the affordability should increase or at the very least remain consistent.

A significant buffer should be applied to the housing target to meaningfully increase affordability.

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

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#### ***Is the plan sound in not making any allowance for unmet need arising elsewhere in the HMA?***

We do not consider that a plan is sound if there is no allowance for unmet need arising from elsewhere in the HMA because the NPPF is clear that LPA's should meet the objectively assessed need within their housing market areas.

The 2015 SHMA identifies that Guildford shares a HMA with Woking Borough Council and Waverley Borough Council.

The Waverley Borough Local Plan was adopted on 20<sup>th</sup> February 2018 and it makes an allowance of 83 dpa for Woking's unmet housing need. The submitted Guildford Borough Local Plan makes no such provision for the balance of Woking's unmet housing need.

Similarly to Woking, almost all the land outside Guildford's built up area is in the Green Belt. However, there are further Green Belt sites in the Borough that could be released to reasonably accommodate a proportion of Woking's unmet need.

We disagree with the Council that Guildford Borough is not able to sustainably meet any additional growth in the period relevant to Woking's need because they have not given this any real consideration.

Guildford Borough should therefore make an allowance to accommodate the unmet housing needs of the HMA. The proportion of unmet need that can realistically be delivered should be tested.

## MATTER 4: HOUSING TRAJECTORY

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

We do not consider that the plan's housing trajectory is a sound basis for meeting the housing need because the houses are needed now to improve the affordability in the Borough and it is not appropriate to effectively backload the housing supply to the latter end of the plan.

The actual/ projected supply of housing should at the very least meet the annual housing target and that target should remain consistent throughout the plan period.

In consideration of the extensive transport schemes that are required to deliver the housing allocations, we do not believe that the proposed allocations will deliver within the timescales set out in the trajectory.

On the strategic sites there are likely to be significant pre-application discussions for all stakeholders to agree an approach to delivering comprehensive development. Once applications are submitted, in our experience, the determination period is likely to extend well beyond the statutory minimum and s106 agreements are not always straightforward and can take a considerable length of time to negotiate. Once a scheme is granted, it does not guarantee an immediate start on site for various planning and commercial reasons. This proposed plan does not allow for enough flexibility to accommodate any such timing delays.

The appeal relating to the former Wisley airfield has not yet been determined and there is no certainty that any dwellings will be delivered in 2019/2020. If the appeal is allowed, there will be a significant lead in time before breaking ground to construct new homes. The relevant planning

agreements will need to be agreed, conditions discharged, enabling and infrastructure works completed before the delivery of any dwellings can even commence. If the appeal is dismissed, then this has wider implications regarding the suitability of the proposed allocation and the potential loss of 2000 dwellings from the plan period.

We do not believe that the Council has taken a 'no stone left unturned' approach to ensure that sustainable sites that have the ability to be delivered in the early years of the plan are not missed. Furthermore, the housing trajectory appears to be overly optimistic in terms of the proposed delivery rates and more sites should be allocated to offer flexibility to ensure delivery rates are maintained throughout the plan period.

## MATTER 5: FIVE YEAR HOUSING LAND SUPPLY

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### *Is the methodological basis for calculating the 5-year housing land supply sound?*

We do not consider that the basis for calculating the 5 year housing land supply is sound because it should be based on the housing target and a 20% buffer for persistent under delivery with the Sedgfield approach to making up the backlog.

The Liverpool approach to spreading the backlog over the whole plan period ignores the fact that new homes are desperately needed in this part of Surrey and every effort should be made to boost the housing supply within the first five years of the plan thus, taking the Sedgfield approach.

The proposed trajectory provides no comfort that the Council will be able to demonstrate a robust five-year housing land supply throughout the Plan Period.

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

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The borough consists of 89% Green Belt, 9% urban area and 2% is land currently designated Countryside Beyond the Green Belt (CBGB). The northern part of the borough is subject to significant development constraints in relation to the Thames Basin Heaths Special Protection Area (SPA) precluding any new homes within 400m of it. The southern half of the borough is also constrained as it forms part of the Surrey Hills Area of Outstanding Natural Beauty (AONB) where national policy states that planning permission for major development should be refused, except in exceptional

circumstances. Furthermore, Guildford town centre is subject to significant flood risk given its proximity to the River Wey.

The lack of suitable and available land has resulted in past annual completions that are significantly lower than the OAN and on that basis we believe that the exceptional circumstances exist to justify Green Belt releases. However, we do not consider that the proposed scale of Green Belt release goes far enough to address the issues around housing land supply.

The draft revised NPPF maintains the strong protections of the Green Belt and retains a high bar before Green Belt land may be released. Where Green Belt is released, first consideration should be given to land which has been previously-developed or which is well-served by public transport.

We do not consider that the Council has given enough consideration to the Green Belt sites which are well-served by public transport.

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