

FAO: Mr Chris Banks – Programme Officer  
C/O Banks Solutions  
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BN16 1EF

10th May 2018

Dear Mr Bore,

## **GUILDFORD BOROUGH LOCAL PLAN: STRATEGY AND SITES - WRITTEN HEARING STATEMENT**

CBRE Limited (CBRE) act as planning consultants to Ashill (Respondent ID<sup>1</sup>) in respect of the land north of Aaron's Hill, Godalming. The Inspector will be familiar with the site through the Waverley Borough Council (WBC) Examination in Public in 2017 where part of the site was released from the Green Belt following the Main Modifications consultation and adoption of the Plan. Ashill are currently advancing a planning application on the WBC part of the site with submission anticipated in Summer 2018. CBRE is instructed by Ashill to submit a written Hearing Statement on their behalf in advance of the Examination in Public (EiP) of the Guildford Borough Council (GBC) Local Plan.

This Hearing Statement responds to the following Matters and Issues as identified in ID-003. For those matters in Bold we have made a request to the Programme Officer to participate in the Hearing Sessions.

- Matter 1: Plan Preparation
- Matter 2: Calculation of the Objectively Assessed Need for Housing (OAN)
- Matter 3: Unmet Need in the Housing Market Area (HMA)
- **Matter 4: Housing Trajectory**
- **Matter 5: Five Year Housing Land Supply**
- **Matter 9: Spatial Strategy, Green Belt and Countryside Protection**

Representations were submitted by Ashill to the Regulation 19 consultation in July 2017. This Hearing Statement does not reproduce the issues set out in previous representations. The comments made within this Hearing Statement relate to questions of soundness of the submitted plan. Each of the respective issues has been responded to in relation to the test of "soundness" set out in paragraph 182 of the National Planning Policy Framework (NPPF).

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<sup>1</sup> We are in dialogue with the Programme Officer who has confirmed that the representations can be submitted and a Respondent ID will be confirmed ahead of the Hearing Sessions.

## Matter 4: Housing Trajectory and Matter 5: Five Year Housing Land Supply

### Housing Trajectory

As drafted, the proposed stepped housing trajectory is not positively prepared or consistent with national policy insofar as it responds to improving the affordability of homes in GBC. At Paragraph 1.20 & 1.21 of GBC's response to the Inspector's Initial Questions (GPS-LPSS-001) it is acknowledged that the increasing affordability pressures has been influenced by supply constraints. In this context, there is a clear role for the new Local Plan to play in providing a plan-led solution to this.

GBC has a substantial shortfall following persistent under-delivery of housing, particularly in the pre-adoption years of the Plan. In regards to improving affordability in GBC this has significant repercussions, as the stepped housing trajectory will not assist in addressing affordability with a reduced housing supply in the early years of the Plan relative to needs. Whilst GBC recognise the LQ affordability ratio of 10.9 (workplace-based) in 2015 as significant in their response to Question 1 of the Inspector's Initial Questions (GPS-LPSS-001), as recent statistics from the Office for National Statistics demonstrates the LQ affordability ratio has since worsened for GBC in recent years to 12.2 and 12.8 for 2016 and 2017 respectively highlighting the scale of the issue.

Furthermore, GBC in paragraph 1.20 of their response to the Inspector's Initial Questions refer to the time lag typically between planning permission and completions with this lag increasing nationally. In conjunction with stepped housing trajectory and the 'phased' five-year housing land supply, the delayed delivery of housing to meet the OAN and respective shortfall would not contribute to curtailing the trend of affordability in GBC. The approach taken in the housing trajectory is not 'justified' or positively prepared in accordance with paragraph 182 of the NPPF as the issue of affordability is not being addressed at the earliest opportunity.

### Five Year Land Supply

There is a clear absence of delivering much needed homes in the initial years relative to the annual housing target. Policy S2 sets out that seven years of the plan period (2019 - 2026) has annual housing targets which are significantly lower than the OAN equivalent. GBC in their response detail that the projected delivery is higher than the targets, reasoning that these have been '*measured in order to calculate the rolling five year supply of housing*'. This approach to the housing trajectory is not a sound basis for meeting the OAN for GBC, as in accordance with paragraph 182 of the NPPF, the Plan should be positively prepared with a strategy which seeks to meet the objectively assessed development requirements. Policy S2 as drafted does not achieve this as the strategy does not seek to meet the respective OAN for GBC.

We acknowledge that strategic sites will have longer build out rates and require a level of infrastructure to support such developments, however in GBC's response to the Question 2 of the Inspector's Initial Questions (GPS-LPSS-001) flexibility of housing delivery can only be accounted for towards the end of the plan period. This approach to delivery greater numbers of housing at the end of the plan once infrastructure solutions (at present not yet delivered) are in place conflicts with paragraph 14 and 21 of the NPPF, particularly that Local Plans should have '*sufficient flexibility to adapt to rapid change*' and that '*policies*

*should be flexible enough to accommodate needs not anticipated in the plan to allow a rapid response to economic circumstances'. The housing trajectory as drafted does not represent sufficient flexibility if external/local circumstances were to impact the level of delivery in the early or latter stages of the Local Plan.*

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**Main Modifications Required to Make the Plan Sound** – as currently drafted the GBC Plan is not positively prepared in relation to improving affordability in the Borough, with housing supply so constrained during the early years of the plan. In addition, the disproportionate weighting of housing delivery towards the end of the plan period is inconsistent with the flexibility that is required of Local Plan to respond to changing local circumstances. This could be resolved through the Main Modifications process with additional sites being identified in the early years of the plan to ensure that the full OAN can be met during the early years of the plan to increase housing supply and improve affordability and deliver a more stable housing trajectory.

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### **Matter 9: Spatial Strategy, Green Belt and Countryside Protection**

As drafted, the proposed spatial strategy is not justified or effective in the way it seeks to distribute housing development.

As GBC refer in their response to Question 8 of the Inspectors Questions, only 56% of the OAN can be achieved utilising a 'brownfield first policy', which rises to 65% of the OAN when taking into consideration land designated as 'Countryside Beyond the Green Belt'. We agree with GBC that against such a significant shortfall against the OAN there are exceptional circumstances that justify the release of land from the Green Belt.

We note that the Inspector has queried whether more brownfield sites should be identified to meet more of the OAN on brownfield sites. Notwithstanding GBC's response in GPS-LPSS-001 that such sites are not available, such is the nature of brownfield development and particularly town centre development in terms of land assembly and lease positions that such an approach would be unlikely to resolve the issue of supply in the early years of the plan required to improve housing affordability and ensuring flexibility within the local plan to respond to changing circumstances.

Whilst we agree with GBC that there is an exceptional circumstances case to justify the need for Green Belt release, with respect to the spatial strategy we disagree with the spatial approach that has been taken to considering Green Belt sites. However, we do agree that suitable extensions of the Guildford Urban Area as identified in the plan should be prioritised. As noted in GBC's response to the Inspector, after considering options in the Guildford Urban Area new sustainable settlements and extensions to existing villages were then considered.

This approach, notably in respect of existing villages, fails to consider the relationship between GBC's administrative boundary and other sustainable urban areas beyond the administrative boundary that are contiguous with it. Whilst acknowledging that in a number of instances the Green Belt performs an important function in preserving settlement merger between Guildford settlements and sustainable settlements beyond the administrative boundary, in other circumstances it would represent a sustainable extension to an existing urban area.

The spatial strategy and proposed spatial distribution for housing development in respect of Green Belt sites does not fully reflect a sustainable pattern of growth. It is apparent that the approach undertaken in the Sustainability Appraisal (discussed in Matter 1 below), did not account for the wider spatial context of sites promoted through the local plan process. The proposed spatial hierarchy does not take into consideration sites located within the local authoritative boundary which are located in sustainable locations comparative to settlements in neighbouring local authorities, for example Godalming.

We consider that in the spatial hierarchy this is a key tier once options for urban extensions in Guildford had been explored. There should be a clear distinction between the sustainability credential promoted by this option and the other spatial locations explored, particularly in relation to 'development around villages, including sensitive Green Belt sites where development is justified' which provide a total of 400 homes in the housing supply. The absence of assessing sustainable development opportunities in the Green Belt in relation to surrounding local authority settlements conflicts with the GBC's response to Question 2 of the Inspector's questions, in that sustainable development opportunities particularly those that can be delivered early have been maximised within the Plan as drafted.

This position is particularly true of Godalming and, in respect of the Land at Aarons Hill site, where GBC have previously acknowledged the contiguous nature of the site if development in Waverley was to occur. Whilst the site formed part of a much wider area (F18) that was not considered appropriate for release from the Green Belt, GBC's own evidence base acknowledged that:

*'The borough boundary is generally physically separated from the settlement boundary within land parcel F18 therefore any development would not be continuous with the settlement boundary, unless future development was brought forward to the west of Godalming within Waverley District.'*

As the Inspector will be aware in Summer 2017 (prior to the GBC Regulation 19 Consultation) WBC undertook a Main Modifications Consultation to release the Land at Aarons Hill from the Green Belt. This was included in the February 2018 adopted plan. WBC also wrote to GBC as part of the Regulation 19 response to request that the site be allocated for development<sup>2</sup>.

Paragraph 180 of the NPPF states that different geographic areas should be taken into account by local planning authorities however, this approach has not been utilised in the preparation of this Local Plan for the spatial distribution of existing and future need for housing. In this context, the plan is not sound as drafted as the spatial strategy has not been positively prepared or justified in accordance with the 'soundness' test of the NPPF.

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**Main Modification Required to Make the Plan Sound** – the approach to the release of sites from the Green Belt needs to consider sustainable settlements that are contiguous with but not within the administrative area of GBC as a means of promoting more sustainable development options through the spatial strategy. The spatial strategy and site allocations should be revised to prioritise sustainable Green Belt options.

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## **Matter 1: Plan Preparation**

We consider that the shortcomings of the Spatial Strategy noted above are derived from shortcomings that exist within the Sustainability Appraisal in the way that individual sites have been considered. This is

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<sup>2</sup> Page 96 – Guildford Borough Submission Local Plan (December 2017)

specifically applicable to 'Site H' within the Sustainability Appraisal ('Land at Eashing Lane/ Aarons Hill') as this site is located in close proximity to Godalming. Whilst Godalming is not located within the Borough, it is identified within the recently adopted WLP as a 'main settlement' which is to expand with an additional 1,520 homes during their respective plan period.

The Pilgrims	Land south of Halfway House at Aaron's Hill, Upper Eashing	2254	
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Page 123 – Sustainability Appraisal (2017)

The assessment applies a 'red score' with respect to distance to the local centre and healthcare facilities, failing to account for the proximity of Godalming as a major settlement.

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**Main Modification Required to Make the Plan Sound** – the approach of the Sustainability Appraisal needs to consider sustainable settlements that are contiguous with but not within the administrative area of GBC as a means of promoting more sustainable development options through the spatial strategy. The spatial strategy and site allocations should be revised to prioritise sustainable Green Belt options.

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### **Matter 2: Calculation of the Objectively Assessed Need for Housing (OAN) and Matter 3: Unmet Need in the Housing Market Area (HMA)**

As drafted the Local Plan does not accommodate any of the unmet need from Woking, and therefore does not reflect a 'positively prepared' plan in meeting the full objectively assessed need for both market and affordable housing in the housing market area. Whilst acknowledging that GBC is not without constraints, many of the characteristics are shared with neighbouring WBC which has positively responded by taking an unmet need from Woking of 83 dpa.

GBC's justification for not meeting the unmet needs from Woking as set out in GPS-LPSS-001 relies on isolated pieces of evidence that have not been fully considered in the context of the housing market area. The reliance on piecemeal information rather than a comprehensive understanding of the dynamics across the housing market area is not justified or consistent with the NPPF.

Affordability as referred to in Matter 4 above is a significant issue for the Borough with no indication from recent statistics that this is alleviating, therefore we welcome the approach taken in the WLP Inspector's Report to provide an uplift in the OAN of the Borough to contribute in improving affordability and meeting the affordable housing need.

The Government consulted on a standardised method for calculating the housing need of local authorities in latter 2017, with an indicative proposed increase of 135 homes per annum, equating to an indicative OAN of 789 for GBC. CBRE acknowledge that the proposed standardised approach was out for consultation and that Local Plans submitted for examination prior to 31 March 2018 can continue with their own OAN methodology. However, GBC is identified as a Borough with a proposed OAN increase which illustrates the degree of housing need within the Borough.

## Summary

In summary, the Local Plan as drafted is not positively prepared or justified in the approach taken to the housing trajectory and the spatial strategy, however through Main Modifications process this could be resolved.

The plan has a heavy reliance on sites being delivered at later stages in the Plan to coincide with the provision of much needed infrastructure, and in this context the plan is not justified or positively prepared insofar as it relates to providing a positive, plan led response to improving affordability through a supply led response in the early years of the plan or producing a plan with sufficient flexibility to respond to changing local circumstances.

In addition, the spatial hierarchy fails to consider the contribution made to OAN and early housing delivery by sustainable settlements that are outside, but contiguous to, the GBC administrative area.

The above matters of soundness could be addressed through the Main Modifications process, with additional sustainable sites being considered that can be delivered in the early years of the plan and are sustainably located. Ashill's site would assist in providing a solution to both of these matters.

We trust that the above comments are helpful in the context of the forthcoming EiP. We would be grateful if you could confirm receipt of this Hearing Statement. Should you wish to discuss this matter in more detail, please do not hesitate to contact me.

Yours sincerely,



**ADAM KINDRED**  
**ASSOCIATE DIRECTOR (PLANNING)**

