

# **Guildford Local Plan Examination**

Examination Statement on behalf  
of CEG, the Earl of Onslow and the  
Trustees of the Clandon Estate

**May 2018**

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Job reference no: 33102

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## Matter 1 - Plan Preparation

### 1.1 Is the Sustainability Appraisal adequate?

- 1.1.1 The SA is inadequate and demonstrates that the Council's process in allocating strategic sites does not accord with its own spatial strategy.
- 1.1.2 Most notably, the identification of Wisley Airfield as a 'given' at the beginning of the LP process, despite it being sequentially less appropriate in spatial hierarchy terms than omitted urban extension sites at Guildford, means that the LP is unsound (see our response to Matter 9).

## Matter 2 - Calculation of the Objectively Assessed Need for Housing

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

2.1 The Guildford Addendum Report is not an appropriate basis for calculating OAN as explained in detail in the Technical Appendix (**Appendix 1**) and summarised below:

- i. **London migration** – this is an important element of demographic-led needs given the links between London and Guildford (Technical Appendix paras 2.4-2.9) but has not been taken into account. The Council seeks to justify this omission by reference to the emerging London Plan (Review of Housing Needs Evidence across West Surrey HMA, para 4.11) but this is untested and has yet to be examined. The current<sup>1</sup> London Plan is planning on the basis of increased out-migration from the capital, which should be reflected in Guildford's OAN. The recent Waverley Local Plan examination concluded<sup>2</sup> that this should be taken into account (Technical Appendix para 2.8). That conclusion is equally applicable in Guildford;
- ii. **Students** - housing needs associated with students should be included in the OAN calculation but these should be added at the final stage of the calculation (i.e. after and on top of the uplift for market signals). They should not be viewed (as the Council mistakenly does) as part of the market signals uplift or "*relieving the pressure on market housing*"<sup>3</sup>;

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<sup>1</sup> 2016 London Plan.

<sup>2</sup> In his February 2018 report (IR26-29). The emerging London Plan was published in December 2017.

<sup>3</sup> As stated in para 1.12 of the Council's Response to the Inspector's Initial Questions.

iii. **Market signals** - the Addendum fails to address these to a degree which could reasonably achieve an improvement in affordability. The Council moved forward the base date of the original SHMA (2015 from 2013) which results in a backlog of c.1,000 dwellings in the HMA (Technical Appendix Table 1). During this period affordability worsened significantly. The Addendum should make a significantly greater uplift than the SHMA to compensate for this (notwithstanding that the uplift was in any event insufficient to address affordability). The Addendum's uplift amounts to just 9% (not the 17% to which the Council misleadingly refers<sup>4</sup>), and the Council has produced no evidence to demonstrate that this could reasonably be expected to improve affordability. The Council presents a benchmarking exercise<sup>5</sup> but this is based on a flawed premise. If applied correctly, on the Council's own evidence the OAN would be 698 dpa<sup>6</sup>.

Analysis by Lichfields<sup>7</sup> shows that a significantly greater uplift is needed. An uplift of c.20-30% is given as an example, with a resulting OAN of c.700-750 dpa. This is a scale of housing stock growth of around 1.2% per year which is well within what could reasonably be expected to occur (Technical Appendix para 2.25-2.30), even when other uplifts (e.g. for students) are applied, given markedly higher rates of stock growth in other locations; and

iv. **Affordable housing** - the severe need provides further justification for increasing the OAN above the Addendum's current conclusion, in line with Dove J in the King's Lynn judgment<sup>8</sup> (Technical Appendix paras 2.53-2.55). Affordable housing needs represent a very substantial proportion of overall needs (517dpa compared to the demographic-led need of 577dpa) and there is clearly scope to increase the OAN (above 654 dpa) to help deliver more. This is not something to which the Council has given proper consideration.

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<sup>4</sup> E.g. at para 1.2 of its Response to the Inspector's Initial Questions 1-8

<sup>5</sup> Paras 1.46-1.49 of the Response to the Inspector's Initial Questions 1-8

<sup>6</sup> See Technical Appendix para 2.39

<sup>7</sup> See Technical Appendix paras 2.15-2.24

<sup>8</sup> Borough of Kings Lynn & West Norfolk v SSCLG [2015] EWHC 2464 (Admin) Of particular note is para 36 which states: *"This consideration of an increase to help deliver the required number of affordable homes, rather than an instruction that the requirement be met in total, is consistent with the policy in paragraph 159 of the Framework requiring that the SHMA "addresses" these needs in determining the FOAN. They should have an important influence increasing the derived FOAN since they are significant factors in providing for housing needs within an area. the need for a uplift to address affordable housing needs."*

## Matter 3 - Unmet Need in the Housing Market Area (HMA)

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

- 3.1 No. Following the Waverley LP examination<sup>9</sup> there remains unmet need in the HMA.
- 3.2 The NPPF states that needs should be met across the HMA<sup>10</sup> and this is the parameter for paras 181<sup>11</sup> and 182<sup>12</sup>. The LP fails because the housing need of the HMA is not met and the Council has not demonstrated that it was positively prepared (para 182).
- 3.3 Section 3.0 of the Technical Appendix (**Appendix 1**) responds to the arguments advanced by the Council to justify its approach<sup>13</sup> (summarised below with the Council's case in bold);
- i. **if Woking's unmet need is to be met, it should be within the Core Strategy period (i.e. before 2027) (Technical Appendix paras 3.4)** - it is clearly desirable to meet unmet need by 2027 and the Council should reflect this in a front-loaded requirement. The Council's decision not to meet any unmet need sits oddly with its purported desire for need to be met soon;
  - ii. **Guildford is not able to sustainably meet any additional growth in the period relevant to Woking's need (Technical Appendix paras 3.5-3.6)** - the Council's position is not substantiated. The SA's explicitly do not support the idea of a 'tipping point' and do not say any additional housing scenarios<sup>14</sup> would be unsustainable in the context of the NPPF / Green Belt / the 'tilted balance' in paragraph 14. The assertion that the Borough's capacity to meet need is virtually identical to its estimate of OAN is curious and not substantiated by evidence;
  - iii. **it is not reasonable, or consistent with achieving sustainable development, to require Guildford to release further Green Belt sites. (Technical Appendix para 3.7)** - the Council's

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<sup>9</sup> In the Inspector's report (IR26-29) dated 1<sup>st</sup> February 2018, less than four months ago

<sup>10</sup> Para 47

<sup>11</sup> For cooperation to be "a continuous process of engagement from initial thinking through to implementation, resulting in a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development"

<sup>12</sup> The soundness test for plans to be "positively prepared... based on a strategy which seeks to meet objectively assessed development ... requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development."

<sup>13</sup> In its Response to the Inspector's Questions 1-8

<sup>14</sup> With the exception of the 2016 SA which ruled out the highest growth option.

SA does not rule out delivering more than Guildford's OAN and the Council has not demonstrated that there are no further sites for sustainable Green Belt release, consistent with paras 83-85 of the Framework. The test for meeting unmet need from neighbouring authorities is the same as that for meeting Guildford's own share of OAN within the HMA. There are further sites which contribute less well to Green Belt purposes and which could be released once the tests at paras 83-85 are properly applied. This would not negate the need for Woking to review its Green Belt, as the Council believe;

- iv. **Woking's unmet need is lower than previously assessed (Technical Appendix para 3.9-3.10)** - the Council is mixing 'apples with pears' by planning based on its own current assessment of need but on a hypothetical view of the future needs of Woking without due consideration of what future needs might be in Guildford or Waverley. This approach means it does not have a clear understanding of need across the HMA<sup>15</sup>. Even if this assertion were accepted, the standard methodology results in an overall figure for the HMA of c.200 dpa more than the current respective figures<sup>16</sup>; and
  
- v. **Woking is required to review its Core Strategy as it is over five years old. This will present the opportunity to meet its OAN. (Technical Appendix para 3.12)** - the Council cannot possibly know the outcome of a future Core Strategy review in Woking (preparation is unlikely to commence before 2020) and the Council should be planning on unmet need which exists now and backdate to 2013, not relying on a new plan that cannot deliver housing before 2024 at the very earliest.

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<sup>15</sup> as per NPPF para 159

<sup>16</sup> See Technical Appendix Table 6



## Matter 4 - Housing Trajectory

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

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

- 4.1.1 The LP's failure to provide for a robustly calculated OAN overall is compounded by the housing trajectory unnecessarily / unjustifiably delaying the delivery of housing / affordable housing in a Borough with a severe backlog. Shorter-term land supply can be materially increased by the allocation of additional deliverable sites as part of Main Modifications to the LP<sup>17</sup>.
- 4.1.2 There are a number of significant omission sites in sustainable locations. Land adjacent to Mellow Park and Ride (LAMPR) (Ref: 2184), for example, could deliver c. 1,000 additional homes in a highly sustainable, sequentially preferable location (as an extension to the Guildford urban area). It has no greater (and when compared to some allocated sites a lesser) impact on the Green Belt (GB) and can deliver housing in the first 5 years after the adoption of the LP as it is not dependent on the RIS improvement scheme for the A3.
- 4.1.3 The Council's housing trajectory (LAA 2017) confirms that the LP strategy creates a deficit (even on the Council's estimate of OAN) that peaks at 1,281 homes in 2019/2020. This deficit is not eliminated until 2025/26 i.e. 10 years from the LP's base date. This is wholly unacceptable given that the Council accepts that there is a '*severe backlog*' (p21 Response to Inspector's Initial Questions) and an ongoing need for 517 affordable homes per annum (SHMA Addendum). This shortfall could, and should, be reduced / eliminated through the allocation of additional sites, such as that on LAMPR.
- 4.1.4 The Council seeks (in part) to justify its strategy on the basis that despite the availability of additional sustainable sites, the LP would deliver a 'step change' in housing delivery. However, such judgments are relative and in this instance the 'step change' is measured against unacceptably low levels of delivery every year since 2006 (Table 2 [p26] Response to Initial Questions).

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<sup>17</sup> As was required in the recent Mid Sussex District Local Plan examination, for example.

4.1.5 NPPF paragraph 14 is clear that the objective for plan-making is to *'meet objectively assessed needs'*. ID3-035 of the PPG is equally clear that LPA's should aim to deal with any undersupply within the first 5 years of the plan period. There is no policy support for plans to be found sound based on a material improvement on historically very poor performance. Appropriate additional sites could and should be allocated.

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

4.2.1 Even if the trajectory is considered to be realistic / deliverable it demonstrably, unnecessarily and unjustifiably under-delivers housing in the first half of the LP period.

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

4.3.1 The primary infrastructure influencing the LP housing trajectory relates to the strategic road network (SRN) and, specifically, the A3 Road Investment Strategy (RIS) scheme which is not due to commence until 2023 at the earliest. The Council (logically) confirms that development must take place ahead of the RIS scheme but needs to be located where it would have the least impact on the SRN.

4.3.2 There are additional strategic sites that could be allocated, such as the LAMPR (Ref: 2184), which is deliverable, sustainable and which would, by virtue of its geographical location / inherent merits have a limited impact on the SRN. Uniquely, the LAMPR is adjacent to an existing park and ride facility with journey times to central Guildford of just 12 minutes and services every 15/20 minutes, 6 days a week. Such sites could materially boost housing supply in the earlier years of the LP period, without compromising the SRN. It could and should be allocated to boost supply.

## Matter 5 - Five Year Housing Land Supply

**5.1 Is the methodological basis for calculating the 5 year housing land supply sound? (The Council's calculations are based on a 20% buffer, the Liverpool methodology and a rising trajectory – see 3.50 of the Council's response to initial questions.)**

5.1.1 No. The Council's approach does not accord with the NPPF / PPG (as identified previously). There are demonstrably reasonable / sustainable ways to deliver additional housing more quickly i.e. through the allocation of additional deliverable and sustainably located sites, particularly those not constrained by the A3 RIS scheme.

**5.3 Is the plan resilient and flexible enough to maintain 5 or more years' supply of deliverable housing land going forward? (See Appendix 7 of the Housing Delivery topic paper).**

5.3.1 No. The LP strategy provides very little flexibility to adapt to rapid change, contrary to NPPF paragraph 14. Appendix 7 of the Housing Topic Paper confirms that for the significant majority of the LP period, land supply does not exceed 5.7 years (and it is often less than that). The Council's housing trajectory confirms that 44% (6,200 homes) of supply comes from just 4 strategic sites, all of which have their own infrastructure / deliverability issues.

5.3.2 The reliance on a limited pool of complex sites, together with the lack of headroom in any 5 year period, provides little resilience to change over the LP period. It could be resolved / assisted by the allocation of additional deliverable sites that accord with the Council's spatial strategy.

## Matter 9 - Spatial Strategy, Green Belt and Countryside Protection

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

9.1.1 The Council's proposed modification to Policy S2 (Question 4 Appendix), clarifying how many homes are proposed in each spatial location / settlement, provides some additional clarity. Interestingly, however, it highlights that almost as many homes are proposed at the two least sustainable tiers of the spatial hierarchy (2,795 homes) as are proposed in the more sustainable / sequentially preferable location as extensions to Guildford (3,350 homes). This highlights a key flaw in the strategy as expanded upon below.

### 9.2 Having regard to the need for housing, does the plan direct it strategically to the right places?

#### Spatial Distribution

9.2.1 The LP (paras 4.1.6 - 4.1.9) states that it seeks to focus development in the most sustainable locations and make the best use of previously developed land. This is confirmed in the SA Report 2017 (p26-31) which identifies ten settlement hierarchy 'Tiers' that the Council purports to have worked through sequentially, maximising growth in each Tier insofar as this is possible / sustainable. It can be noted that development in the GB around Guildford (Tier 8) is sequentially preferable to any new settlement (Tier 9), or to development in the GB around villages (Tier 10). Given that Guildford is by far the most significant town in the Borough, and indeed has a sub-regional function, this is wholly justified.

9.2.2 Despite setting out a clear sequential spatial hierarchy (see above), with a new settlement being one of the least sustainable options, the SA Report 2017 records that:

*'the Council has supported the option of a new settlement since 2013/14' (emphasis added)*

9.2.3 This support from the beginning of the LP process is confirmed with reference to the Regulation 18 LP (2014) which allocates a new settlement at Wisley for up to 2,100 homes.

9.2.4 The Interim SA Report (August 2014) documents (page 51) that the LAMPR was identified in the Green Belt & Countryside Study (GB&C Study) as a Potential Development Area but that it was not allocated as it was not considered to be a reasonable alternative at that time as:

*“...insufficient evidence is available at this stage to demonstrate that the site is deliverable during the plan period.”* (emphasis added)

9.2.5 Subsequent representations by WYG for the LAMPR landowner (in 2016 and 2017) of course provided the evidence to confirm this site’s availability, suitability and deliverability.

9.2.6 Despite this material change in circumstances, the Council failed to re-consider the need to allocate the sequentially less preferable site at Wisley (or the potential allocation of Wisley in addition to the LAMPR). Indeed, the SA Report 2017 confirms again that strategic development at Wisley;

*“...was identified as ‘a given’ for the purposes of developing spatial strategy alternatives.”*

9.2.7 Given that there are unallocated yet available / deliverable sites, such as the LAMPR, which are sequentially preferable to a new settlement (on the Council’s own case) it is impossible to reconcile the Council taking a new settlement at Wisley as ‘a given’, in terms of soundness, logic or internal consistency, with the fact that it claims to have adopted a sequential strategy that maximises development in the most sequentially preferable locations. This is flawed as a matter of process and outcome.

9.2.8 Furthermore, by taking Wisley as a ‘given’, the SA Report 2017 confirms that the Council has never assessed Wisley against other demonstrably reasonable alternatives such as the LAMPR. Instead (Box 6.9 of the SA Report), urban extension options are assessed only against each other, with some allocated, some rejected and others identified as variables (LAMPR/Clandon Golf). This is flawed in terms of SA process, and contrary to the NPPF para 182 ‘justified’ soundness test.

9.2.9 In addition to being sequentially preferable, Table C of the SA Report (page 119) demonstrates that the LAMPR (unsurprisingly) also scores more positively than Wisley against the SA matrix. Had it been assessed, together with other urban extension sites, as a reasonable alternative to Wisley, it would /

should have been allocated. A sound process would create a more sustainable and deliverable strategy for the delivery of housing, consistent with the Council's own spatial hierarchy.

### Movement Patterns

#### *Impacts on A3/ Strategic Road Network (SRN)*

9.2.10 Most of the proposed strategic allocations will access the A3. However, there are potential sites which, due to their proximity to the town centre and sustainable access / choice of modes, will have less impact. These are key to the early delivery of housing.

9.2.11 HE's Route Strategy: M25 to Solent (A3 and M3) (April 2015) notes that capacity issues are concentrated around Guildford and at Junction 10 (M25). These are listed as one of the Strategic Road Strategy's 'weaknesses' (GB Transport Strategy, 2017). Committed improvements, including the A320 to the Hogs Back junction with the A31, and the M25 J10 Wisley Interchange, are not commencing until 2023 at the earliest, with an estimated four-year delivery timescale. No planning applications have been submitted and the cost is anticipated to be £100-£250 million per scheme (subject to funding). This impacts upon the Wisley allocation in particular due to its' direct access to the A3. The allocations at Blackwell Farm / Gosden Hill Farm are also dependent on these A3 improvements to an extent.

9.2.12 By contrast sites such as the LAMPR, which is located further from the A3, are less reliant on these A3 improvements and could deliver housing earlier with small-scale, localised highway improvements (e.g. the A25/A246 corridor), improving the existing route into the town centre. With a more limited volume of traffic accessing the A3, and with traffic dispersing prior to this point, the allocation of the LAMPR would allow earlier housing delivery and provide a wider strategic benefit - making the town more accessible from the east.

#### *Accessibility & Sustainable Movement Corridor*

9.2.13 The Council has identified a Sustainable Movement Corridor (SMC) [SA Report page 86] that extends from Blackwell Farm, through Guildford to Gosden Hill Farm in the east. Notably, the allocation at Wisley is not part of, or consistent with, this SMC and requires a:

*“significant bus network to serve the site... to ensure that residents and visitors have a sustainable transport option for access to the site”* (LP Policy A25: Requirement 6)

9.2.14 Off-site cycle networks would also be required as the Wisley site is some distance from Guildford town centre and there is no realistic option to walk / cycle to key services. The allocation at Wisley also fails to accord with the ‘Guildford Town and Approaches Movement Study’ (March 2015) strategy which seeks to deliver the following:

- i. comprehensive network of walking and cycling routes;
- ii. pedestrian facilities, improved crossings, shared surfaces;
- iii. cycle parking and bike sharing/ cycle hire schemes;
- iv. park & ride facilities.

9.2.15 By contrast, sites adjacent to the Guildford urban area can accord with this strategy, providing more comprehensive, sustainable links to key facilities and an ability to integrate with existing communities - being on the edge of the operational urban transport network. The LAMPR, for example, has an existing highway access and is already well-connected to Guildford town centre by way of bus, cycle and pedestrian links. The plans at **Appendix 2** demonstrate this clearly.

9.2.16 It is surprising that the identified SMC extends only to Gosden Hill Farm in the east and not to the existing Merrow P&R, linking back through the town centre utilising the key route (A25/A246) which already provides access in just 12 minutes. This is a significant omission.

9.2.17 The allocation of the LAMPR, with opportunities to improve local junctions, deliver walking / cycling improvements and with access to the existing Clandon Station and a future Merrow Station, would form a logical complement to / extension of the Council’s SMC concept. Remote sites such as Wisley, that are dependent on significant investment in the SRN and which cannot link with existing infrastructure to provide a choice of modes, are not sustainable or consistent with the Council’s own transport strategy.

#### Green Belt / Landscape

9.2.18 The justification for strategic allocations is based upon a flawed assessment of the contribution that land makes to the Green Belt (GB).

9.2.19 The 2013 Green Belt and Countryside Study (GBCS)<sup>18</sup> considered land parcels adjoining the edge of Guildford, Ash and Tongham, identifying land suitable for release within Potential Development Areas (PDAs). This included the sites at Blackwell Farm and Gosden Hill Farm. Notably, it also included the LAMPR (Land Parcel E1) which was (rightly) considered to make a limited contribution to the GB and identified as suitable for development.<sup>19</sup>

9.2.20 The Council subsequently produced a 2014 GBCS Volume II Addendum<sup>20</sup> that sought to re-assess the contribution of land parcels to the third and fourth Green Belt purposes<sup>21</sup>, and to update the Environmental Capacity Analysis (ECA) used to identify PDAs. Specifically, the revised assessment sought to consider the influence of built development and urban influences when assessing contribution to GB purpose 3, and to consider the historic setting of Guildford when assessing contribution to GB purpose 4<sup>22</sup>.

9.2.21 In relation to purpose 4, the revised GBCS methodology incorrectly considers potential impacts on Conservation Areas, Historic Parks and Gardens and Scheduled Monuments. These do not convey contribution to the setting of historic towns and as such are not relevant to NPPF paragraph 80. The amended methodology also does not address key issues, including the high-level nature of the assessment which fails to take account of localised variations within parcels and containment by robust and permanent boundaries. With regard to the LAMPR, for example, it can be noted that the 2014 Addendum fails to take full account of the urban influences and the park and ride (Parcel E1) when assessing GB purpose 3. The assessment of the LAMPR also considers the setting of East Clandon Conservation Area and Clandon Park as contributing to GB purpose 4, despite Clandon Park being scoped out for Gosden Hill Farm (Parcels C1 & 2).

9.2.22 This flawed / inconsistent approach results in fundamentally flawed conclusions, with the 2014 Addendum perversely concluding that parcels of land within the open countryside, situated away from

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<sup>18</sup> Guildford Borough Green Belt and Countryside Study, Pegasus Planning Group, February 2013

<sup>19</sup> Guildford Borough Green Belt and Countryside Study – Volume II: Stage 4 – Environmental Capacity Analysis; Guildford (East) – Land Parcel E1: Land at Epsom Road and Land Parcel E1 – Recommended Revised Green Belt Boundary Alignment Plan

<sup>20</sup> Guildford Borough Green Belt and Countryside Study - Volume II Addendum, Pegasus Planning Group, April 2014

<sup>21</sup> NPPF paragraph 80: third bullet *“to assist in safeguarding the countryside from encroachment”* and 4<sup>th</sup> bullet *“to preserve the setting and special character of historic towns”*

<sup>22</sup> Guildford Borough Green Belt and Countryside Study - Volume II Addendum, Pegasus Planning Group, April 2014: Section 2: Green Belt Purposes, pages 2 and 3



built areas are of 'Low' and 'Medium' sensitivity (i.e. Wisley Airfield – Parcel C18), whilst land adjacent to the Guildford urban edge and well contained by robust boundaries, is identified as being of a 'High' sensitivity (i.e. LAMPR – Parcel E1). Indeed, the updated ECA continues to support the LAMPR as a PDA<sup>23</sup> in recognition of its' containment by substantial woodland and influence of the park & ride and golf course.<sup>24</sup> This would not appear to have been taken into account when the Council determined not to allocate the LAMPR. These fundamental strategic issues are summarised, for ease of reference, in the table at **Appendix 3**.

9.2.23 The LP does not direct development to the right places in line with the spatial strategy. The 2014 Addendum is demonstrably flawed in its assessment of the contribution of sites to the GB and their suitability for development, resulting in an unjustifiable / unsustainable distribution of development.

#### Landscape

9.2.24 The LP does not give equal weighting to potential landscape constraints when identifying the suitability of sites. For example, the proposed allocation at Blackwell Farm falls within the AGLV and AONB<sup>25</sup>, with the Council recognising that:

*"A strategic development at Blackwell Farm poses particular issues from a landscape perspective..." (SA Report page 49)*

9.2.25 Furthermore, as identified by the Surrey Hills AONB Areas of Search Natural Beauty Evaluation report (AONB Evaluation Report), the AGLV to the west of the Blackwell Farm site has also been identified as a recommended additional area of AONB.<sup>26</sup>

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<sup>23</sup> Guildford Borough Green Belt and Countryside Study - Volume II Addendum, Pegasus Planning Group, April 2014: Appendix 8 – Potential Development Areas (PDA's) Surrounding Urban Areas, 15<sup>th</sup> April 2014 (drawing ref. BNL\_0287\_12-J)

<sup>24</sup> Guildford Borough Green Belt and Countryside Study - Volume II Addendum, Pegasus Planning Group, April 2014: Appendix 3 – Environmental Capacity Analysis: Guildford (East) – Land Parcel E1: Land at Epsom Road

<sup>25</sup> Sustainability Appraisal of the Guildford Borough Local Plan, AECOM, June 2017 Chapter 8: Section 8.2, paragraph 8.2.2, fifth bullet point 'Landscape' (page 49)

<sup>26</sup> Surrey Hills AONB Areas of Search Natural Beauty Evaluation, Hankinson Duckett Associates, October 2013: 'Recommended Additional Areas of AONB' plan, Area 12-1 Evaluation, pages 28 and 29.

9.2.26 In contrast, the LAMPR has been rejected as a development allocation by the Council, in part due to the fact that it borders the AONB and is within the AGLV<sup>27</sup>. This is despite the fact that the AONB Evaluation Report confirms that the LAMPR is not of suitable quality to be considered as an AONB candidate site - reflecting its' situation adjacent to and influenced by the urban edge and park & ride, as well as the engineered landform and features associated with the golf course. These characteristics are typical of the areas of Open Chalk Farmland excluded from the AONB, as recognised by the AONB Evaluation Report.<sup>28</sup>

9.2.27 The SA identifies under 'Landscape' that<sup>29</sup>:

*"The first point to note is that the spatial strategy will impact upon AGLV and AONB; however, efforts have been made to limit impacts as far as possible... Also, the decision has been taken not to maximise growth... around the Guildford urban area (Clandon Golf), despite these being sustainable locations in certain respects.... partly because of a desire to conserve AGLV and the setting of the AONB."*

9.2.28 This is contradictory. Blackwell Farm will require development within the AGLV and AONB (associated with the access road) yet is allocated. The LAMPR has been rejected yet would have no impact on the AONB.

### Infrastructure

9.2.29 The LP purports to boost housing as far as is reasonably possible by directing development to locations in the shorter term that have the least impact on the SRN. However, this is demonstrably not the case as the LP allocates sites such as Wisley, Gosden Hill Farm and Blackwell Farm that would have a much greater impact on the SRN than some discounted sites, such as the LAMPR.

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<sup>27</sup> Sustainability Appraisal of the Guildford Borough Local Plan, AECOM, June 2017 - Box 6.9: Green Belt site options around the Guildford urban area, page 30

<sup>28</sup> Surrey Hills AONB Areas of Search Natural Beauty Evaluation, Hankinson Duckett Associates, October 2013: Chapter 6, Section 6.1 'Evaluation', paragraph 6.1.2

<sup>29</sup> Sustainability Appraisal of the Guildford Borough Local Plan, AECOM, June 2017 - Chapter 10 Appraisal of the Proposed Submission Plan and Targeted Changes, 10.11 Landscape, paragraph 10.11.3

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

9.4.1 The Council's responses to Questions 5 and 8 of the Inspector's Initial Questions set out clearly how the LP makes full use of PDL in the Borough, and that the proposed extent of urban extensions in the GB are required to meet even the Council's estimate of OAN. The constraints in the Borough, and the need for housing / affordable housing, are such that strategic GB releases are an essential component in meeting the housing needs of the Borough / HMA appropriately.

**9.5 Having regard to 9.2 to 9.4 above, are the overall amount of land proposed to be released from the Green Belt, and the strategic locations for Green Belt release, justified by exceptional circumstances?**

9.5.1 The quantum of land proposed to be released from the GB is justified by exceptional circumstances. Indeed, the release of additional land from the GB is necessary and justified by a higher OAN (see Matter 3) and the need to deliver housing more quickly.

9.5.2 The Council's response to the Inspector's Initial Questions confirms that 89% of the Borough is GB, including the land around its principal settlement (Guildford), and there is a severe backlog of housing / affordable housing and a significant on-going need for both. Only 65% of the Council's estimated OAN can be met on land outside the GB (LP para 8.10) and this is the principal element of the exceptional circumstances case. The Council confirms that where GB sites could contribute towards early housing delivery, this is another strategic level consideration.

9.5.3 In terms of the site-specific GB releases, Appendix 5 of the Council's response to the Inspector's Initial Questions sets out the case for each. For reasons set out previously, we consider that the Council's process in allocating a new settlement at Wisley (and removing it from the GB), whilst failing to first allocate sequentially preferable, more sustainable and deliverable sites such as the LAMPR, is unsound.

**9.7 Taking into account the extent of housing, employment and other needs, does the plan take a sound approach towards the protection of the landscape, including the AONB and AGLV, and the countryside generally?**

9.7.1 The reliance on local landscape designations such as the AGLV<sup>30</sup> is out of date and contradicts the NPPF which requires policies to be criteria based<sup>31</sup> and supported by landscape character assessments (LCA) and assessments of landscape sensitivity.<sup>32</sup>

9.7.2 The SA recognises that the spatial strategy will impact upon the AGLV and AONB<sup>33</sup>. However, when identifying strategic sites, the LP adopts an inconsistent / unsound approach to protection of the landscape. The 2007 Surrey AGLV Review<sup>34</sup> supported the use of LCA linked to criteria based policies (CBP) and recommended a review of AONB boundaries to identify additional areas for inclusion in the AONB, and deletion of the AGLV. The subsequent AONB Evaluation Report<sup>35</sup> identifies land west of Blackwell Farm as a candidate site for inclusion in the AONB. The LAMPR (which is currently in the AGLV) is not recommended for inclusion in the AONB.

9.7.3 The Rural-Urban Fringe Assessment<sup>36</sup> provides a local level LCA of land around Guildford, recognising that there are opportunities to develop land adjacent to the AONB and within the AGLV (such as the LAMPR) provided that proposals respect identified landscape sensitivities.<sup>37</sup>

9.7.4 Conversely, the Rural Assessment<sup>38</sup> identifies Wisley Airfield as being within a rural area with views to the open slopes and wooded crest of the chalk downs to the south and historic, rural character.

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<sup>30</sup> The Surrey Hills AGLV was originally designated in 1953 and reviewed in 1971 and 1981.

<sup>31</sup> NPPF, paragraph 113: "Local planning authorities should set criteria based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged."

<sup>32</sup> NPPF, paragraph 170: "*Where appropriate, landscape character assessments should also be prepared, integrated with assessment of historic landscape character, and for areas where there are major expansion options assessment of landscape sensitivity.*"

<sup>33</sup> Sustainability Appraisal of the Guildford Borough Local Plan, AECOM, June 2017 - Chapter 10 Appraisal of the Proposed Submission Plan and Targeted Changes, 10.11 Landscape, paragraph 10.11.3

<sup>34</sup> Surrey Hills AGLV Review, Chris Burnett Associates, June 2007

<sup>35</sup> Surrey Hills AONB Areas of Search Natural Beauty Evaluation, Hankinson Duckett Associates, October 2013

<sup>36</sup> Guildford Landscape Character Assessment & Guidance, Volume 2: Rural-Urban Fringe Assessment, Land Use Consultants, January 2007

<sup>37</sup> Land adjacent to Meroo Park and Ride (LCT D1) is identified as being "*relatively less sensitive compared to other areas on the edge of Guildford*" being well screened and contained (pages 53-56). This assessment was made prior to the development of the park and ride and golf course.

<sup>38</sup> Guildford Landscape Character Assessment & Guidance, Volume 1: Rural Assessment, Land Use Consultants, January 2007

Guidelines recommend conservation of the rural landscape and woodland and protection of character from urbanisation of rural roads and visually intrusive development.<sup>39</sup>

9.7.5 The Council's spatial approach in respect of landscape is inconsistent and unsound. Strategic developments are proposed within the AONB (at Blackwell Farm) and in areas the LCA identifies as rural and sensitive to visually intrusive development and urbanisation (Wisley), whilst sites such as the LAMPR, sustainably located on the edge of Guildford, are omitted despite being outside the AONB and identified by the Council's own landscape and Green Belt evidence base as appropriate for development.

**9.8 If the Plan had to accommodate a greater housing requirement, for example through a higher OAN, what would be the implications in terms of the spatial strategy?**

9.8.1 A greater overall housing requirement and / or a need to allocate additional sites to deliver more housing in the shorter term could be accommodated in a way that is entirely consistent with the spatial strategy.

9.8.2 The Council needs to allocate additional housing to provide for a properly calculated OAN. It also needs to allocate additional sites that can deliver in the short term. In doing so it should re-ensure that it properly applies its own spatial hierarchy, genuinely maximises development in the most sustainable tiers of the hierarchy (particularly around Guildford), and bases its decisions on a consistent application of landscape constraints and the genuine contribution that sites do / do not make to the purposes of the GB.

9.8.3 The LAMPR could deliver in the region of 1,000 additional homes in a highly sustainable location which is sequentially preferable to any new settlement option or any further development around the GB villages, and less reliant on improvements to the A3 than most other options i.e. it could deliver more quickly. Unlike Wisley or any other strategic omission site, it could easily supplement and is wholly consistent with the Council's SMC concept through Guildford.

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<sup>39</sup> Rural Assessment, Assessment of Landscape Character Area E2: Ockham and Clandon Wooded Rolling Claylands evaluation, pages 77 - 85

## Matter 11 -Site Allocations

*A35, Wisley Airfield*

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

11.33.1 For the reasons set out in our response to Matter 9.5, we do not consider that there are exceptional circumstances to justify the release of this site from the GB whilst there are sequentially preferable and more sustainable options, such as the LAMPR, which are not allocated. The Council should re-visit the application of its spatial strategy to maximise development in the most sustainable locations first.

## **APPENDIX 1**

## Technical Appendix – Guildford Local Plan Examination

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**Our ref** 16377/MS/BHy

**Date** May 2018

**Subject** **UPDATED REVIEW ON OBJECTIVELY ASSESSED NEED IN GUILDFORD AND UNMET NEED**

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### **1.0 Introduction**

- 1.1 This technical appendix has been prepared by Lichfields to support CEG’s Matters Statement to the Guildford Local Plan examination. CEG is promoting the site ‘Land adjacent to Merrow Park and Ride’.
- 1.2 In respect of housing need in its emerging Local Plan, Guildford Borough Council (“the Council”) is reliant upon:
- 1 West Surrey Strategic Housing Market Assessment September 2015 (“the SHMA”), covering Guildford, Waverley and Woking;
  - 2 West Surrey Strategic Housing Market Assessment: Guildford Addendum Report March 2017 (“the Addendum”) which updated the SHMA’s assessment for Guildford only; and
  - 3 Review of Housing Needs Evidence across West Surrey HMA for Guildford Borough Council November 2017 (“the Review”) which summarised the position for Guildford and considered some additional evidence put forward at the Waverley examination to justify the Addendum’s conclusions for Guildford.
- 1.3 In addition to these documents, reference is also made in this technical appendix to the Council’s Responses to the Inspector’s Initial Questions 1-8. This is referred to as “the Council’s response”.

The purpose of this note is to provide a succinct, as far as possible, evidential platform for the Matters Statement for CEG. It has been necessary to produce this technical appendix in addition to previous representations (see below) because of the new evidence put forward by the Council since the previous consultation, i.e. the Review and the Council’s response. In addition, the Waverley Local Plan examination has now concluded (and the Inspector’s Report published) which provides certainty on the unmet need position in the housing market area (HMA).

### **Regulation 19 Consultation**

- 1.4 Lichfields previously submitted representations to the Regulation 19 Consultation on the Guildford Local Plan on behalf of Solum Regeneration (respondent number 8834689). Those representations (comment ID: pslp171/1210) included a review of the SHMA and the Addendum (at Annexe 2 of comment pslp171/1210). Analysis within this Annexe which remains relevant to Lichfields representations for CEG is referenced throughout this Technical Appendix as “the Solum representations”. Analysis contained within the Solum representations is not repeated here.



## 2.0 Calculation of Objectively Assessed Need for Housing (OAN)

2.1 This section of the technical appendix covers the approach of the Council to its calculation of OAN. It addresses the following issues:

- a Period
- b Demographic-led needs
  - i London migration
  - ii Students
- c Market Signals
- d Employment-led needs
- e Affordable housing need

### A. Period

2.2 The SHMA assessed needs across the HMA for the period 2013-33. This assessment period was subsequently taken forward in the Waverley Local Plan, and in earlier iterations of the Guildford Local Plan. For Guildford, the SHMA assessed that need over the period 2013-33 amounted to 693 dwellings per annum (see SHMA para 10.37). The Addendum (prepared for Guildford only) moved forward the assessment period to 2015-34, and now assesses Guildford's need over this period to be 654 dpa. It is this need (i.e. 654 dpa over 19 years) which the Council is planning to meet in its Submission Plan, as per Policy S2.

2.3 However, by moving forward the base date by two years, the Council has – based on the Guildford figures alone - artificially 'wiped clean' a significant amount of backlog against its assessed need for the period 2013-15. As shown in Table 1 the Council has only delivered 379 dwellings during a period in which its needs were 1,386 dwellings<sup>1</sup>, creating a backlog of just over 1,000 dwellings. These dwellings are not being met in Waverley or in Woking and are now unmet within the HMA. The Addendum does not compensate for this by, for example, making a greater uplift for market signals to reflect insufficient delivery and worsening affordability in the intervening period - this is explored in more detail below under 'Market Signals'.

Table 1 Backlog accrued between SHMA base date and Addendum base date in Guildford

	Need	Completions	Backlog
2013/14	693	137	-556
2014/15	693	242	-451
<b>Total</b>	<b>1,386</b>	<b>379</b>	<b>-1,007</b>

Source: Lichfields based on SHMA, Guildford Annual Monitoring Report

### B. Demographic-led needs

#### i. London Migration

2.4 The SHMA and the Addendum reached conflicting conclusions about whether needs associated with London should be included in Guildford's OAN (despite being underpinned by almost identical data). This was reviewed by Lichfields in more detail in the Solum representations at paras 3.13-3.16.

<sup>1</sup> Based on the SHMA's estimate of Guildford's OAHN of 693dpa over two years.

- 2.5 In the SHMA, a London Sensitivity analysis was undertaken (para 4.67-78 and Table 25). This showed that, compared to the 2012-based SNPP starting point (533 dpa), an uplift of 35 dpa (to 568 dpa) was needed to take account of changes associated with London. However, the Council's most recent position (as set out in the Review at para 4.11) is that an adjustment for London is not appropriate given the emerging London Plan Review is based on 10-year migration trends.
- 2.6 The 2016-based Greater London Authority (GLA) projections which underpin the emerging London Plan Review have yet to be tested through any examination, and indeed, it is yet to be determined whether the highly (some argue, unrealistically) ambitious levels of growth that the draft London Plan Review proposes for the capital can actually be accommodated<sup>2</sup>.
- 2.7 Until the London Plan Review has been through examination, it is unknown if the projections (with their equivalent modelled figures for local authorities outside London – if those numbers are even tested) are an appropriate basis for planning in London. Equally it is unknown whether the London Plan Review's inflated housing requirement for London - which draws upon these projections - is justified and effective.
- 2.8 Pending, this it would be prudent to plan on the basis of the current London Plan which has been found sound on the basis of the 2013 London Strategic Housing Market Assessment which assumed that in the aftermath of recession, trends of migration in and out of London would partly resume to those seen pre-recession. This was tested in the West Surrey SHMA and at the recent Waverley Local Plan examination the Inspector concluded that the 12 dpa identified in the SHMA should be included within Waverley's OAN:
- “...there is the issue of migration from London. There is a very specific reason why this needs to be considered in the case of Waverley. This is referred to in paragraph 2.55 of the SHMA: there is unusually close interconnectivity between the authorities in this HMA and London, and paragraph 4.68 recognises an important interaction in the demographic projections. The SHMA has undertaken a sensitivity test to examine the effects of different assumptions in respect of London migration. It is therefore a local consideration that needs to be taken into account in this particular instance. Net migration from London fell during the recession from 2008, and the SHMA work examined the potential effects of a partial rebound to pre-recession levels. Translating this into households and dwellings, the effect on Waverley was quantified as 12 dpa. The economy, the housing market and indeed the affordability indices in the HMA have all seen significant growth since the recession and it is reasonable to consider that there has been some resumption of the trend. Whilst recognising that the precise level of the continuing trend is uncertain, the figure of 12 dpa, based on only a partial rebound of pre-recessionary net flows, is a cautious approach and should be taken into account” (para 30).*
- 2.9 In light of the Waverley Local Plan Inspector's report, the omission of changing migration trends associated with London is an inconsistency and flaw in the Council's evidence base and is contrary to the PPG which requires plan-makers to take into account specific local circumstances which may not be reflected in trend-based projections (PPG ID 2a-017). Guildford (and the HMA) has particularly significant relationships with London as noted by the Waverley Inspector and in the SHMA itself (for example see SHMA Table 5). The Council is not justified in making its assessment based on a set of assumptions (i.e. those informing the emerging London Plan Review) that are untested, and when (in reality) there is likely to be

<sup>2</sup> The London Plan proposes an annual target of 65,000 dwellings per annum from 2019/20 compared to 42,000 (2015-2025) in the current London Plan. In 2016/17 there were 39,560 net housing completions. Permanent dwelling starts in London in 2016/17 were 27% below the equivalent figure for 2014/15. It is thus highly unlikely completions will rise sufficiently to meet 65,000 from 2019/20 and indeed, the backlog in London is likely to increase.

increased out-migration from London rather than a reduction, given the challenge in boosting supply.

*ii. Students*

- 2.10 The Council’s approach to housing needs associated with students is unclear. In the SHMA (para 8.8-8.20), it is stated that:

*“The base demographic projections do not show additional in-migration in student age groups. The implication of this it that it is reasonable to expect that an increase in the student population would result in an additional housing need over and above the demographic projection undertaken.” (emphasis added)*

- 2.11 The implication of this is that any housing associated with meeting student needs should be considered in addition to the needs associated with the general population. In other words, the student needs (in this case 23 dpa) should be added to the housing figure at the very last stage, i.e. after demographic-led needs, uplifts for employment and/or uplifts for market signals have been applied.

- 2.12 However, the Council’s response at para 1.12 states that raising the OAN by 4% to account for student growth relieves pressure on market housing. It is unclear how providing more market housing to cater for an increase in the student population over and above the demographic projection (as made explicitly clear in the SHMA and again in para 8.19 of the Addendum) would in any way relieve pressure on market housing. These additional dwellings are catering for growth in a specific group within the population which requires housing in addition to general housing needs (and associated factors such as employment or market signals). The Council is attempting to suggest that its uplift for student housing is part of the overall uplift for market signals (see Council’s response at para 1.2) resulting in a purported 17% uplift. This is palpably misleading – the uplift for market signals amounts to 9% (579 dpa [economic] + 52 dpa = 631 dpa) (we explore this in more detail below). The uplift for students is separate to this and is addressing a wholly different issue.

- 2.13 As set out below, we consider that a much greater uplift is needed to improve affordability. Having established the housing need necessary to improve affordability, the student need (23 dpa) should then be added on to reflect growth in student numbers.

*Summary on demographic-led needs*

- 2.14 Overall, based on the current London Plan (and having regard to the recent findings in Waverley) the Council should be making an allowance for London migration as a specific local circumstance not reflected in trend-based projections (as per the PPG). An uplift for students is also needed, however these needs should be added at the last stage of calculating OAN and should not (as indicated by the Council) be viewed as part of any uplift for market signals.

**C. Market signals**

- 2.15 An extensive review of methods to determine an appropriate market signals uplift for Guildford is set out at paras 3.24 to 3.26 of the Solum Representations. That analysis remains relevant (notably the affordability modelling based on OBR and University of Reading to which we turn later when discussing the Council’s response); however, some updated information has become available which is covered below.

## *Effect of base date – SHMA and Addendum*

2.16 As set out above, the Addendum moves forward the base date of the assessment period by two years, during which the assessed need for that period (693 dpa, as per the SHMA) was not met, with under-delivery of around 1,000 dwellings. Such under-delivery is likely to have led to a combination of changing balance of migration (either from Guildford to the rest of the HMA, or out of the HMA altogether), suppressed household formation and/or worsening affordability.

2.17 Affordability data published by the Office for National Statistics (ONS) clearly shows that affordability in Guildford deteriorated in this time period, as shown in Table 2. In this context, it would be reasonable to expect that an assessment which moved forward the base date from 2013 to 2015 would make a greater uplift for market signals to reflect the continued deterioration in affordability (and thereby indirectly addressing this ‘backlog’). We note that this principle is supported in the draft Planning Practice Guidance (“draft PPG”) which states<sup>3</sup> that when applying the standard methodology, backlog should not be included as it is assumed any past under-delivery will be reflected in and uplift for affordability (the implication being that past under-delivery resulted in worsening affordability which increases the uplift applied).

Table 2 Workplace-based Affordability in Guildford – 2013-15

	2013	2014	2015
Lower Quartile	10.3	11.0	11.2
Median	9.8	10.8	10.9

Source: ONS

2.18 As shown in Table 2 of the Solum representations (which summarises the approaches used in the SHMA and Addendum), in both reports the Council has made its market signals adjustment by making a headship rate adjustment to 25-34 year olds. The SHMA and Addendum uplifts are not directly comparable because the SHMA made its uplift on a much higher economic scenario (637 + 31 = 668 dpa) whilst the Addendum made its uplift on an economic scenario which was almost identical to its demographic-led need (579 + 52 = 631 dpa). Notwithstanding, the Council has not demonstrated that this adjustment (which in the Addendum amounts to 9%) could reasonably achieve an improvement in affordability based on current (2015) levels, let alone is sufficient to address worsening affordability since 2013. The movement of the base date to effectively ‘erase’ two years’ worth of backlog in a period of deteriorating affordability provides further justification for applying a much greater market signals uplift than is applied in the Addendum.

## *Scale of uplift - Weighted apportionment of national needs*

2.19 Paras 3.46 to 3.48 of the Solum representations set out the context for this method and the three alternative scenarios presented. Since that analysis was prepared, ONS has published affordability data a further year of affordability date (for 2017). For Guildford, it shows both lower quartile and median affordability (workplace-based) has continued to deteriorate significantly (Table 3), with a similar picture across most local authorities.

<sup>3</sup> Page 27 of the Draft PPG under the section headed: “Can plan-making authorities take account of past under delivery of new homes in preparing plans?”

Table 3 Workplace-based Affordability in Guildford

	2013	2014	2015	2016	2017
Lower Quartile	10.3	11.0	11.2	12.0	12.5
Median	9.8	10.8	10.9	12.2	12.8

Source: ONS

- 2.20 In the Autumn Budget 2017 the Chancellor Philip Hammond MP announced an ambition for national housebuilding to reach 300,000 per year (the analysis in the Solum representations was undertaken on the basis of a national total of 250,000). A national total of 300,000 homes per year is in line with the findings of the House of Lords Select Committee on Economic Affairs in July 2016 (extracts of which are contained in Appendix 1 of the Solum Representations) which concluded that “*To address the housing crisis at least 300,000 new homes are needed annually for the foreseeable future*”.
- 2.21 Table 4 shows the updated outcomes of this analysis based on the 2017 affordability data and assuming both a 250,000 and 300,000 national total per year. The ‘share’ refers to Guildford’s annual share of the national uplift (above the household projections - 35,000 and 85,000 dwellings per annum respectively) and the total refers to the total annual figure this would give for Guildford when the demographic baseline (577) is included. The updated analysis demonstrates that using this method, assuming national delivery of 250,000 per annum, an uplift of between 20% and 35% remains justified. However, given Government’s clear statement of intent for a level of housing supply aligned to 300,000 to improve affordability as per the House of Lords report, Guildford’s uplift would need to be significantly higher (at c.50% or more) to make a proportionate contribution to the national improvement in affordability.

Table 4 Original and updated analysis - National apportionment of market signals uplifts

	Solum Representations		Updated – 250,000 national total (35,000 uplift)		Updated – 300,000 national total (85,000 uplift)	
	Share (total)	Uplift on 577 dpa	Share (total)	Uplift on 577 dpa	Share (total)	Uplift on 577 dpa
Method 1	209 (786)	36%	204 (781)	35%	<b>495 (1,092)</b>	<b>86%</b>
Method 2	134 (711)	23%	131 (708)	22%	<b>318 (895)</b>	<b>59%</b>
Method 3	115 (692)	20%	113 (690)	20%	<b>274 (851)</b>	<b>51%</b>

Source: Lichfields analysis based on ONS/DCLG

### Scale of uplift – share of national uplift

- 2.22 A national figure of 300,000 dwellings per annum represents a 40% uplift on the ‘bare’ household projections (c.210,000)– if all authorities took an equal fair share (i.e. all areas delivered their household projections + 40%) this would mean Guildford delivering **c.780 dpa** (557 +40%). Taking an alternative view, delivery of 300,000 homes per annum represents a national stock growth rate of 1.26% per annum<sup>4</sup>. If all areas grew at this rate, for Guildford this would represent **c.730 dpa**.
- 2.23 In practise it would not be appropriate for all areas to deliver housing at the same rate, and it would be reasonable (and indeed necessary) for higher demand areas to deliver at a faster rate, and vice versa. As Guildford clearly is an area of high housing demand (relative to the national average), it certainly should not deliver any less than its ‘fair share’ and indeed would need to

<sup>4</sup> Based on DCLG Dwelling Stock for England Live Table 100 (2016) – 23,733,000 dwellings.

deliver more in order to respond to demand and improve affordability. Methods 1-3 set out above effectively quantify what this would be given Guildford's affordability ratio, showing as a minimum **c.850 dpa** could achieve an improvement in affordability if it made an appropriate contribution to the 300,000 headline figure.

- 2.24 This further demonstrates that the Addendum's proposed uplift of 52 dpa which amounts to 9% on the demographic-led or economic-led needs (of 577 dpa and 579 dpa respectively) is likely to be insufficient to reasonably expect an improvement in affordability.

*Uplift – scenarios that could reasonably be expected to occur*

- 2.25 The PPG highlights the importance of future housing needs assessments being those which can reasonably be expected to occur – in other words, avoiding a situation where housing need is based on implausible scenarios. This is not to say that an assessment of housing need should be moderated by a view on the impact of constraints – the PPG ID2a-004 is clear in this regard<sup>5</sup>. However, it does mean that the uplift should be one that is reasonably plausible.
- 2.26 The context for this is important. Figure 2 of the Solum representations shows that, historically, Guildford has delivered amongst the lowest annual rates of housing delivery in the South of England, at c.0.5% per annum, and most other authorities in the wider regions have delivered higher rates of housing growth, ranging up to around 1.4% per annum in Swindon, Dartford and Milton Keynes. It is easy to see how a superficial view might be taken that compares the Council's proposed housing figure (654 dpa) with its historic delivery rate and sees greater uplifts to its OAN as not being possible to achieve.
- 2.27 If Guildford were to increase its rates of delivery to 1.2%-1.4% of stock per annum (as seen in numerous locations elsewhere) this would be equivalent to a delivery rate of c.770-910 dpa. The lower end of this range would represent an uplift of c.33% on the demographic-led need figure of 577 dpa, but as a rate of stock growth would be well within what could be deemed reasonable based on delivery rates in similar areas over the last 15 years.
- 2.28 In addition to the historic growth rate analysis, we have reviewed recently (post-NPPF) adopted Local Plans in the South of England and the adopted requirements as a growth rate (Table 5). These levels of growth are likely to be more ambitious than historic targets in those areas due to the NPPF requirement for Local Authorities to deliver a 'significant boost' to housing supply, yet have still been judged by Inspectors to be deliverable (i.e. reasonable).
- 2.29 Cherwell in Oxfordshire has the highest growth rate of 1.82%; a rate which was clearly deemed to be deliverable by the Inspector, and is set to increase further once Cherwell undertakes its Local Plan Review to accommodate a share of Oxford's unmet need. Several other areas have growth rates of around 1.6-1.7% per annum – higher than rates seen historically but still deemed to be reasonable by those Inspectors. Similar to Guildford, most of these are relatively high demand areas in the south of England.

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<sup>5</sup> The PPG ID2a-004 states: "the assessment of development needs is an objective assessment of need based on facts and unbiased evidence. Plan makers should not apply constraints to the overall assessment of need, such as limitations imposed by the supply of land for new development, historic under performance, viability, infrastructure or environmental constraints."

Table 5 Adopted housing targets in post-NPPF Plans

	Adopted Annual Housing Target	Stock 2016	Annual Growth Rate
Cherwell*	1,140(+)	62,402	1.82%(+)
Swindon	1,625**	94,374	1.72%
Mid Sussex	1,026	61,878	1.66%
Taunton Deane	850	52,840	1.61%
Milton Keynes	1,750	108,981	1.61%
East Cambridgeshire	575	36,971	1.56%

Source: Housing targets - respective Local Plans. Stock - DCLG Council Tax Base data.

\*Figure for Cherwell will increase following Local Plan Review to take account of additional need from Oxford.

\*\*Total housing target 2011-2026 22,000 dwellings (1,467 dpa), however Policy SD2 of Local Plan states average annual housing delivery from 2016-2026 will be higher at 1,625 dpa

2.30 It is evident that whilst past delivery rates provide a benchmark for determining what could reasonably be expected to occur, past historic under-delivery should not be a constraint. There are a number examples where Inspectors have accepted more ambitious growth rates in plans – levels higher than seen historically but still deemed deliverable. In this context, even an increase in delivery rates in Guildford to 1.2% (representing c.770 dpa – around 120 dpa more than the current OAN) is well within what could reasonably be expected to occur.

*Standard Methodology – context for scenarios that could ‘reasonably be expected to occur’*

2.31 It is not CEG’s view that the Council should adopt the standard methodology as the basis of OAN in its current Plan. The Plan was submitted before the transitional arrangements take effect, the final draft of the revised NPPF remains out for consultation and the proposed changes should be taken as a whole. However, during its consultation on ‘Planning for the Right Homes in the Right Places’ (PRHRP) and in its subsequent response, Government did set out some information which Lichfields consider is useful context for determining what scale of delivery is considered ‘reasonable’.

2.32 In its proposals for the standard method for calculating housing needs, Government stated that:  
*“...to ensure that the proposed housing need is as deliverable as possible, so are proposing a cap to limit any increase an authority may face when they review their plan”. (PRHRP consultation document para 15).*

2.33 This cap depends on the age of a Local Authority’s plan. Where the plan is less than 5 years old, the needs assessment is capped at 40% above the current plan requirement. Where the plan is more than 5 years old, the cap is 40% above whichever is higher of the plan requirement or household projections. This implies that any uplift up to 40% is, by default, not considered to be unreasonable as the basis for an assessment of need.

2.34 For Guildford (as the adopted Plan is more than five years old), if it were subject to the standard methodology today, the standard methodology would yield a figure of 789 dwellings per annum<sup>6</sup>. This is effectively a figure which (as per the Government’s standard methodology) Government itself deems to be within the realms of being ‘deliverable’. To clarify, this in itself does not represent a figure we put forward as the OAN for Guildford, however it represents a parameter for a level of delivery which is ‘reasonable’ (in addition to the other context set out above).

<sup>6</sup> Based on household growth of 564 2016-26 and a median workplace-based affordability ratio in 2017 of 12.5, which would yield a 53% uplift (yielding 865 dpa) but capped at 40%.

## The Council's view on market signals

### *Scale of uplift*

- 2.35 The Council's view is that the OAN (654 dpa) provides an overall uplift of 17% to the starting point (557 dpa) (as stated in para 1.2 of the Council's response). However, regrettably this is misleading:
- 1 20 dpa of this uplift (557 to 577) is due to updating the projections for the latest mid-year estimates, i.e. is meeting household growth associated with population change. This is simply addressing the PPG requirement for assessments to take into account the most recent population estimates (PPG ID2a-017) and is not an uplift associated with improving affordability; and
  - 2 23 dpa of this uplift relates to growth in student numbers. As this relates to growth in a specific group (i.e. students) over and above the baseline projections, it cannot be regarded as uplift which addresses affordability (as set out above under 'Students') because the homes provided are to address an existing need, not to provide 'extra dwellings' that would improve affordability.
- 2.36 That the Council presents its uplift in the way it has is troubling in what it reveals about its approach to the issue.
- 2.37 The Council's effective market signals uplift (i.e. that proportion of the OAN which is over and above demographic/other needs which could expect to impact affordability) is therefore **9%** (52 dwellings over and above the 577/579 starting point, depending on whether demographic or economic needs are used).
- 2.38 As per the Addendum, the Council maintains in its Review and response that the proposed uplift (17% in the Council's view, but in reality 9%) is sufficient to address markets signals, having regard to the outcomes at the Waverley examination and by benchmarking against uplifts elsewhere (see Figure 6 of the Council's response). Benchmarking, according to the Council, suggests an uplift of 16.5% is applicable (based on affordability in Guildford in 2015 - Council's response para 1.49, also see para 4.10 of the Review) which, in its view, supports the 17% uplift.
- 2.39 However, the Council here is comparing 'apples with pears'. The market signals uplifts which are shown in Figure 6 of the Council's response and in Appendix 4 of the Solum representations represent the percentage uplifts applied for market signals only (indeed this is noted explicitly in the table footnote at Appendix 4 of the Solum representations). However, the Council is seeking to use these examples to justify its overall uplift from the baseline household projections (i.e. from the household projection figure of 557 dpa to the final OAN of 654 dpa). If a 17% uplift for market signals were applied in a consistent manner to the comparables, this would amount to:
- 577 (the demographic-led needs) + 17% = 675 dpa
  - Plus 23 dpa for students = OAN of **698 dpa**.
- 2.40 Therefore, on the Council's own evidence, its benchmarking exercise would support an OAN of 698 dpa, not 654 dpa.

### *Higher levels of housebuilding*

- 2.41 In its response, the Council also refers to the fact that in the plan period, delivery rates are expected to be three times the level of housing delivery seen historically (c.900 per annum



compared to c.300 per annum), which it believes (para 1.45) could reasonably expect an improvement in affordability. This is a strikingly fallacious view.

2.42 Relative improvements to affordability will only occur if there is an increase in supply above the given level of household growth in order to moderate prices given wider economic conditions. A boost above historic housing delivery does not in of itself demonstrate that an improvement in affordability could be expected to occur. Self-evidently historic housing delivery may be (in Guildford’s case, was) less than was needed to meet previous household growth. Historic levels of household growth may in turn have been less than the future projected level of growth. Past housing under delivery may have generated worsening affordability and baked in suppressed household formation.

2.43 An assessment of whether future housing provision is likely to increase affordability will need to take into account underlying trends (such as population and household growth) to establish how much of this housing is actually additional (i.e. inducing household formation above the baseline and thus improving affordability). This analysis is absent from the Council’s response.

*OBR/University of Reading affordability modelling*

2.44 In Waverley, the Inspector regarded OBR/UofR modelling [put forward by Lichfields] as a ‘credible approach’ (para 22), and noted several other methods including a weighted approach and benchmarking increases. These approaches were put forward by Lichfields to the Waverley examination and the same methods for Guildford were put forward as part of the Solum representations (para 3.41-45). This broad approach (OBR/UofR) has also recently been used by MHCLG itself in its publication “*Analysis of the determinants of house price changes*” published in April 2018. Whilst referring to house prices at the national level, this lends further support to the adoption of this approach.

2.45 For Guildford, the OBR/UofR modelling suggested at least a 51% uplift (to 873 dpa, from a 577 dpa baseline) could be appropriate, with the other methods suggesting a 20-58% uplift was required (see Solum representations Table 3). In our view, this analysis taken collectively (i.e. with the other approaches put forward) indicated that at minimum a 20-30% uplift above the demographic-led change could reasonably be expected to improve affordability, giving an OAN of circa. 700-750 dpa (see Solum representations para 3.55). Once student needs were added, this would give c.725-775 dpa (see Solum representations para 3.70), increasing further once the London adjustment is included, as endorsed by the Waverley Local Plan Inspector’s Report.

2.46 In the Council’s response at paras 1.33 to 1.36, the Council sets out the reasons why it believes the affordability modelling approach not to be appropriate for local analysis. However, the Council’s mindset fails to recognise that in a planning system where HMA and nationwide improvements in affordability must inevitably be made through plan requirements at a local level, it will clearly necessitate locally-based judgements based on evidence. There is no suggestion that one should apply model-based approaches in isolation or with excessive degrees of precision and the Council’s criticism that housing markets are fluid rather misses the point.

2.47 What the Council ultimately fails to do is adequately address the PPG question of applying a market signals uplift that could be reasonably expected to improve affordability (PPG ID 2a-020). This is a gaping lacuna in its evidence. The Council cannot point to any cogent evidence that its effective uplift of 9% will improve affordability, and its criticism of alternatives is misdirected. Its approach is not soundly based.

- 2.48 The Council also believes that regard should only be had to the affordability position up to 2015 (the base date of the plan), and that to include further uplift would be double-counting (para 1.17). It considers that affordability since 2015 has deteriorated partly because of relatively low housing supply (para 1.23), and that this will be made up going forward in the plan period as the OAN is backdated to 2015. This would only be relevant if there were evidence that the proposed uplift identified by the Council in the Addendum would be sufficient to improve affordability even back to the level seen in 2015 (let alone improve it further). No such evidence is provided.

### **Summary – market signals**

- 2.49 The Council has not adequately demonstrated in the SHMA, Addendum, Review or in the Council's response that its uplift for market signals could reasonably be expected to lead to an improvement in affordability. Firstly, the Council misleadingly advances the idea that its uplift is 17% and seeks to justify this by comparing this to uplifts in other areas. This exercise has been undertaken incorrectly and were it applied correctly would in fact yield an OAN of 698 dpa – c.50 dpa higher than the Addendum. Secondly, the Council's attempt to suggest its uplift can be expected to improve affordability is based on a limited discussion around how future rates of delivery compare to historically rates, completely blind to underlying levels of household growth or any other factors.
- 2.50 By contrast, several methods have been put forward by Lichfields in the Solum representations (paras 3.41 to 3.56) which demonstrated that for there to be a reasonable prospect of improving affordability in Guildford an uplift in the region of at least c.20-30% (giving a figure of c.700-750 dpa) is likely to be needed. As demonstrated in Figure 2 of the Solum representations and above, this would result in a level of growth for Guildford which is well within what could reasonably be expected to occur (even once London/student needs are added to this figure, the OAN for Guildford would not be above rates of delivery seen elsewhere historically and certainly not above the high growth rates in adopted plans elsewhere in the South of England).

### **Employment-led needs**

- 2.51 Lichfields previously raised concerns about the updating of Guildford's employment forecasts in the Addendum (which were significantly reduced compared to the forecasts used in the SHMA) in paras 3.19 to 3.22 of the Solum representations. Lichfields was concerned that if a reduction in the forecasts for Guildford were offset by increases in the forecasts elsewhere in the HMA, this would create unmet need (as the employment forecasts had not been updated for Waverley and Woking).
- 2.52 In the Review, the Council has responded to these criticisms and stated that if the updated forecasts used in Guildford were also used for the rest of the HMA, the effect is an overall reduction of 8% in forecast job growth (Review, para 3.14). This is helpful clarification and we therefore have no further concerns specifically related to the impact of reduced employment forecasts for Guildford regarding OAN in the HMA.

### **Affordable Housing Need**

- 2.53 A review of relevant caselaw regarding how affordable housing needs should be incorporated in OAN is set out at para 2.9 of the Solum representations (including the *Kings Lynn* judgment). The Solum representations also explain at para 3.60-61 how the SHMA and Addendum sought to downplay the overall assessment of affordable housing need. However, we consider that the SHMA's biggest failing is that affordable housing needs have not had an 'important influence' in

OAN (as per *Kings Lynn*) – again, this is covered in more detail in paras 3.62 to 3.68 of the Solum representations.

- 2.54 The SHMA identifies an annual affordable housing need in Guildford of 455 affordable homes per annum and the Addendum identifies an even greater need of 517 per annum (most likely due to the increase in household projections used in the two studies and/or an increase in the level of backlog).
- 2.55 The Council’s response states at para 1.32 that the increase in housing provision compared to historically will increase the delivery of affordable housing. Whilst this may be true to an extent, it cannot be disputed that the Council’s affordable housing need is severe, representing a significant portion of its demographic-led need (517 compared to 577). Of relevance here is the judgment in *Kings Lynn* (see para 2.9 of the Solum representations) which re-iterates the PPG method of considering the amount of housing required to meet full affordable housing needs and the quantum of market housing needed to deliver full affordable housing needs (at a given percentage) (PPG ID 2a-029). As the judgment sets out, this can lead to a full OAN figure which is so large that a Local Planning Authority would have “*little or no prospect of delivering (it) in practice*”. Therefore, it is clear from this judgment that although it may not be reasonable and therefore should not be expected that the OAN will include affordable housing needs in full, an uplift or similar consideration of how affordable needs can be ‘addressed’ is absolutely necessary as part of the full OAN calculation. The inference (when combined with PPG ID2a-004) is that OAN should address affordable housing needs up to a point at which there is not a reasonable prospect of market housing delivery sufficient to provide it. As demonstrated above under ‘Market Signals’ there is clearly scope for the OAN to be increased well above that concluded in the Addendum in order to maximise affordable housing delivery. There is every reason to consider a scale of housing delivery at c.700-750 dpa (slightly higher at c.750-800 once London and student needs are included) would occur, which would go some way to meeting the Borough’s substantial affordable housing needs.

## Summary – OAN

- 2.56 The Council’s figure of 654 dpa does not reflect OAN for Guildford. It does not take into account local demographic circumstances which justify deviating from the population projections, in this case the impact of London. At the recent Waverley Local Plan examination the Inspector concluded that this should be taken into account in Waverley’s OAN, and there is no reason to adopt a different approach in Guildford. The Council’s argument is predicated on untested GLA projections that inform an untested emerging London Plan.
- 2.57 The Council’s most significant failing in its OAN is the failure to make sufficient uplift for market signals at a level which could reasonably be expected to improve affordability. The Council mistakenly believes it has applied a 17% uplift and has sought to justify this by comparing a 17% uplift to other areas but has done so incorrectly. If the 17% uplift for Guildford was applied properly, its OAN should be a figure of 698 dpa. A range of evidence put forward by Lichfields in the Solum representations and the updated analysis presented in this technical appendix demonstrates that the Council’s uplift (of 9%) is insufficient to address affordability, and that an uplift of at least c.20-30% is a level which could both reasonably expect to improve affordability and be at a level which is well within the realms of what could reasonably be expected to occur. After adding the impact of London and students, the final OAN (with this uplift for market signals) would be in the range of c.750-800 dpa.

### **3.0 Unmet Need**

#### **Council's position**

- 3.1 The submitted Guildford Local Plan does not include any allowance for unmet need from Woking. Woking has been clearly identified in the SHMA (Section 2.0) as being within a HMA along with Guildford and Waverley, and para 47 NPPF is clear that Local Plans should meet the full objectively assessed need within their HMA. The SHMA identifies Woking's OAN as 517 dpa 2013-33. The Woking Core Strategy makes provision for 292 dpa 2010-27, and therefore in the overlapping period (i.e. 2013-27) there currently exists unmet need of 225 dpa (3,150 total). Waverley is current making provision for half of this need (1,575) over its plan period (equivalent to 83 dpa as its plan period is 19 years 2013-32).
- 3.2 The Council's response sets out the reasons why it has not included an allowance for unmet need from Woking (page 15). These are:
- 1 The Council considers that if Woking's unmet need is to be met, it should be within the time period identified in its local plan in it, i.e. before 2026/27, and not after.
  - 2 Guildford is not able to sustainably meet any additional growth in the period relevant to Woking's need. If Guildford were able to do so then such development would be required to boost Guildford's own early delivery.
  - 3 In particular, the Council does not consider it reasonable, or consistent with achieving sustainable development, to require Guildford to release further Green Belt sites - which is what would be required if a contribution to Woking's unmet need were to be made - without a consideration of locating development in Woking's own Green Belt.
  - 4 Furthermore, the Council considers that Woking's unmet need is lower than previously assessed
  - 5 Woking is required to review its Core Strategy as it is over five years old. This will present the opportunity to meet its OAN.
- 3.3 We respond to each of the Council's asserted reasons for not meeting any of Woking's unmet need below.
- 1. Unmet need should be met before 2026-27**
- 3.4 We do not disagree that unmet needs from Woking should be addressed in its plan period (and not deferred until later). However the Council's logic here is unclear. If its position is that unmet need should be met within Woking's plan period (2010-2027), then the Council should be reflecting this in a front-loaded requirement in Guildford which addresses as much of Woking's unmet need over this period (i.e. addressing Woking's unmet need which has been accruing since 2013, and meeting as much unmet need as possible by 2027). The Council's position (i.e. not to meet any of Woking's unmet need) appears at odds with its view that Woking's needs should be met sooner (i.e. by 2027). It also sits uncomfortably with its position in respect of the role of the review of the Woking Plan as a vehicle for meeting that need.
- 2. Guildford is not able to sustainably meet any additional growth in the period relevant to Woking's need**
- 3.5 CEG's response to these questions are set out in more detail in the Matters Statement under Issues 1 (Plan preparation), 4 (Housing trajectory), 5 (Five year housing land supply) and 9 (Spatial strategy, Green Belt and Countryside Protection). However, looking at the scale of

housing supply proposed in each of the iterations of the Sustainability Appraisals (SA), we note that:

- The 2016 iteration of the SA (based on the OAN of 693 dpa 2013-33) ruled out the low and high options (13,844 and 18,594 dwellings respectively). However it noted that of the remaining options *“there is no clear best performing, or ‘most sustainable’, option. Rather, there is a need to establish a preferred approach after having determined how best to ‘trade-off’ between competing objectives, and in-light of wide ranging perspectives.”* (Guildford Local Plan SA Report 2016: Non-Technical Summary, p.6); and
- The 2017 iteration of the SA (based on the OAN of 654 dpa 2015-34) similarly found that *“The intention is for the Council and stakeholders to take these findings into account when considering how best to ‘trade-off’ between competing objectives, and establish the ‘most sustainable’ option”.* (Guildford Local Plan SA Report 2017: Non-Technical Summary, p.7). The Council’s preferred option was option 1, which provided for the OAN plus a buffer of around 9% (this was the lowest housing growth scenario assessed). However, the SA is not explicit that any scenarios which provide for a quantum of housing above Option 1 would be unsustainable in the context of the NPPF, its policy on Green Belt or the ‘tilted balance’ in paragraph 14.

3.6 The conclusions reached by both SAs appear to be at direct odds with the Council’s position that it cannot possibly meet any of Woking’s needs in a sustainable manner. The Council implies that any level of growth above the lowest option in the most recent SA is unsustainable which appears to be a complete misinterpretation of the SA which does not go as far as drawing any such conclusion. To the contrary, the most recent SA does not rule out options higher than that selected by the Council, rather it simply notes that the chosen option will be a trade-off between different objectives. The Council itself has not evidenced how this ‘trade-off’ has been applied with reference to the policy of the NPPF. The Council has significantly compromised meeting its housing objectives (i.e. not meeting the needs of the HMA, as required in the NPPF – ie para 47 or 181) without any clear evidence that doing so would be fundamentally unsustainable.

### **3. The Council does not consider it reasonable, or consistent with achieving sustainable development, to require Guildford to release further Green Belt sites**

3.7 As set out above, there is no evidenced-reason from a sustainability perspective that the Council’s approach – which coincidentally, is its own estimated OAN - is the ‘tipping point’ beyond which it cannot provide any more housing to meet needs within the HMA. However, the Council also believes that as it has already released Green Belt sites to meeting its own need, that it would not be consistent with sustainable development to require further sites to meet Woking’s unmet need:

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

3.8 There are a number of reasons why this argument does not withstand basic scrutiny:

- 1 The Council's most recent SA does not rule out delivering more than Guildford's OAN on the basis of sustainability. The Council has not considered the implications of not meeting this need against the prospect of housing needs not being met or considered the relative sustainability of these needs being met later (or not at all) in Woking once that district has a new plan prepared and sites then implemented. It has not demonstrated, through its Green Belt review that there are no further sites for sustainable Green Belt release, consistent with paras 83-85 of the Framework.
- 2 The Council's view that it should only be required to meet its own needs is directly at odds with the NPPF which requires Local authorities to meet needs of the HMA. It has been established that unmet need from Woking currently exists and has been accruing since 2013. The Council itself has stated that it believes Woking's need should be met sooner (i.e. within the period to 2027) rather than later. This militates against deferring this need to Woking's new plan;
- 3 The Council is placing an arbitrary 'limit' on the level of Green Belt release (i.e. its own OAN). It would be strikingly coincidental (in reality, wholly contrived) if the actual capacity for Green Belt release in Guildford exactly matched the OAN figure for Guildford only, and the Council has not justified its position in this regard. It is likely that there are further sites which contribute poorly to Green Belt purposes which could be released to meet the needs of the HMA, and indeed, even sites which perform some Green Belt purpose might be shown to be justified for release once the tests in paras 83-85 are properly applied;
- 4 Meeting some of Woking's unmet needs now would not remove the need for Woking to review its Green Belt in the future. Any Core Strategy review in Woking will almost certainly require a need for Green Belt review in order to identify land beyond the current Core Strategy Period (2027 onwards) and to satisfy itself that NPPF para 85 has been complied with<sup>7</sup>. Furthermore, whilst all three authorities in the HMA are constrained by Green Belt, Woking is the only authority which is also underbounded, i.e. its administrative boundary is drawn fairly tightly around its urban area. The Waverley Inspector noted that "*the town will very probably remain unable to accommodate a significant proportion of its OAN in future*" (IR para 28). This is quite clearly an appropriate judgement and the Council has not evidenced otherwise.
- 5 Finally, for the reasons set out below, the exercise of releasing further Green Belt now to meet Woking's current unmet need is very unlikely to prejudice future plan-making in the HMA because, as a whole, needs in the HMA are expected to increase by c.200 dpa once all three authorities complete a review. The pressure on Guildford is likely to increase rather than diminish, and this justifies taking a positive approach to dealing with this issue in Guildford now, consistent with the approach in Waverley.

#### **4. The Council considers that Woking's unmet need is lower than previously assessed**

- 3.9 In the Council's response (para 2.18-24) the Council notes that the standard methodology would indicate a need of 409 dpa for Woking, and that on this basis the unmet need would be reduced from 3,150 to 1,638 (117 \* 14 years 2013-27) (Council's response para 2.22). Once Waverley's contribution of 1,577 dwellings is taken into account, this would leave a residual unmet need of

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<sup>7</sup> This is setting aside obvious further issues surrounding Green Belt review in the draft revised NPPF should it be adopted in its current drafted form. It is of note that para 84 – 85 are largely captured in the proposed new wording of the draft NPPF.

only 61 homes (Council's response, para 2.23). However, there are two main flaws in this assertion:

- 1 The Council has assumed that if/when Woking reviews its Core Strategy using the revised NPPF (and therefore the standard methodology<sup>8</sup>), its new annual requirement will be backdated to the start of the SHMA period (i.e. 2013), effectively erasing the SHMA's need assessment of 517 dpa for Woking from 2013 onwards and replacing it with 409.

This would simply not occur. The draft PPG is clear that the most recent affordability data and the most recent household projections (which are published every two years) should be used. It also states that previous under-delivery (i.e. backlog) should not be factored into the needs assessment as this will be reflected in the affordability adjustment. All of this implies the base date should be as recent as possible (data depending).

As at May 2018 Woking is working on a Site Allocations DPD, and there is no indication on Woking Borough Council's website when it will be commencing a review of its Core Strategy<sup>9</sup>. Even if Woking began a review of its plan next year, the base date for its new housing needs assessment would be at the earliest 2017, but could be 2018 or later if a review does not commence until spring next year when another year of affordability data will be available, on top of a new set of 2016-based population and household projections (which would similarly apply for Waverley and Guildford). The SHMA requirement (of 517 dpa) would still represent the need for the period from 2013 up until the base date of Woking's new plan;

- 2 The Council has failed to recognise that for the HMA overall, the standard methodology produces a figure higher than all three authorities' current OAN. This is shown in Table 6. This effectively means that by the time all three authorities complete a review of their Plans if one adopted (as the Council prefers to do for its view of Woking), the annual need in the HMA is likely to (based on current figures) increase by around 200 dwellings per annum. This would increase if affordability continues to deteriorate.

More particularly, the Council is mixing 'apples with pears' by planning based on its own current assessment of need but on a hypothetical view of the future needs of Woking. Even if Woking's needs reduce in the future and the provision in Waverley does turn out to be sufficient to meet almost all of Woking's unmet need, both Waverley and Guildford would (based on current evidence) expect to see an increase in their OAN which entirely outweighs this reduction in Woking. Any increase in housing provision in Guildford now (either through increasing its own OAN, incorporating some of Woking's current unmet need or both) will not undermine planning in the future in the Borough or HMA because the overall level of need in the HMA will – as it currently stands - be higher as a result of the standard methodology.

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<sup>8</sup> Which is in draft at the current time, including its proposed transitional arrangements. It is not a relevant figure for the purpose of examining plans submitted and being tested under the current NPPF.

<sup>9</sup> Its most recent LDS is dated 2016. Woking Council recently advised that its aim is for the Council to publish its preferred Site Allocations DPD plan by the end of October 2018 for its Regulation 19 Consultation. The Council has delayed the process due to the significant volume of representations (32,164) it received in response to its previous consultation. Once the plan is submitted it will then need to be examined and adopted. It is difficult to envisage this process being completed before 2020. This is the earliest point at which any tangible work is likely to be undertaken on a Review of the Core Strategy. Any such Review will have its own lengthy timescales.

Table 6 Outcome of standard methodology for West Surrey Authorities

	Current OAN (Source)	Standard Methodology Figure*	Difference
Guildford	654 dpa 2015-34 (Addendum)	789	+135
Waverley	495 dpa 2013-33 (Inspector's Report)	637	+142
Woking	517 dpa 2013-33 (SHMA)	430	-87
<b>Total</b>	<b>1,666</b>	<b>1,856</b>	<b>+190</b>

Source: Lichfields based on SHMA/Addendum/Waverley Inspector's Report/ONS/DCLG

\*Figures have been updated to reflect 2017 affordability data published in April 2018 hence may differ slightly to figures in DCLG published Table from September 2017 consultation

3.10 In summary, if the Council is using its assessments of what might happen to need in the HMA in the future to justify its current strategy, then the Council's approach should be to increase housing provision, and not to disregard unmet need in the HMA. The Council's is apparently concerned about increasing housing provision now for needs in Woking which may not exist in the future, but these concerns are based on a partial and hypothetical view of what need might be a future, yet to be started plan, and in any event unfounded given the position across the HMA.

3.11 The Council should be working with the position as it exists now, which is a significant and growing backlog of needs that have been accruing since 2013.

**5. Woking is required to review its Core Strategy as it is over 5 years old. This will present the opportunity to meet their OAN.**

3.12 The Council cannot possibly know now the outcome of a future Core Strategy review in Woking, or whether it will provide an opportunity to meet its OAN. As indicated in footnote 9 above, the prospect of Woking's Core Strategy review is distant. The Council should be planning on the scale of unmet need in the HMA which exists now, based on the current evidence base. It is recognised that it would be preferable to have three aligned plans (or a joint plan) coming forward in parallel, but this is not the reality. A failure to adequately respond to unmet needs in Woking going back to 2013 and defer the matter to Woking's Plan Review is to, in effect, defer the meeting of these needs for over ten years<sup>10</sup>. The Council fails to acknowledge the adverse consequences of this delay in meeting needs. In any event, as set out above, even if Woking reviews its Core Strategy and was somehow able to meet a greater portion of the HMA's OAN than the Core Strategy, there is every possibility that the needs in Guildford and Waverley would increase and counter act any reduction in unmet need across the HMA; ultimately, the Council's position is based on conjecture.

**Summary – unmet needs**

3.13 The Council acknowledges that unmet need exists in the HMA and contends that this need should be met before 2027 (the end of Woking's plan period). However this at odds with the Council's Plan, which fails to provide for any of it. The Council sets out in its response why it has not sought to do so. Regrettably, none of these reasons withstand basic scrutiny:

<sup>10</sup> Based on a Core Strategy Review for Woking commencing no earlier than 2020, being adopted at the earliest in 2022, and having new Green Belt or other allocations pursuant to that plan coming forward to achieve completions in 2024. In reality, these timescales are hugely optimistic and the reality is likely to be even later for any upswing in housing delivery. In simple terms, the reality is that the unmet need in Woking to 2027 is 'on the table' for Guildford's plan to consider, and as per para 47 and 181 this should be met where consistent with the Framework.



- The Council has misinterpreted its SA and concluded that it cannot possible provide more than Option 1 (which allows for Guildford's OAN and a small buffer) without this being unsustainable – the SA reaches no such conclusion and the Council has not justified its assertion;
- The Council has also sought to assess what might happen in the future regarding Woking's need, but this is conjecture given the evidential basis will inevitably have moved on by the time Woking reviews its Core Strategy. Even on its own terms, it has failed to acknowledge what the future outcomes would also be for Guildford and Waverley (i.e. an increase overall in needs across the HMA);
- The Council believes that undertaking additional Green Belt release in Guildford will remove the need for Woking to do so in its Core Strategy review but has produced no evidence to support this assertion. In any event, notwithstanding Green Belt review, the Waverley Inspector noted that Woking will very probably remain unable to accommodate a significant proportion of its OAN in future. Guildford Council has produced no evidence to indicate otherwise.
- The belief that Woking will have an opportunity to meet its needs through a future Core Strategy review is entirely speculative and ignores the fact that plan-making timescales mean that by the time it has produced its Review, the needs it might seek to meet would have been unmet for over ten years.

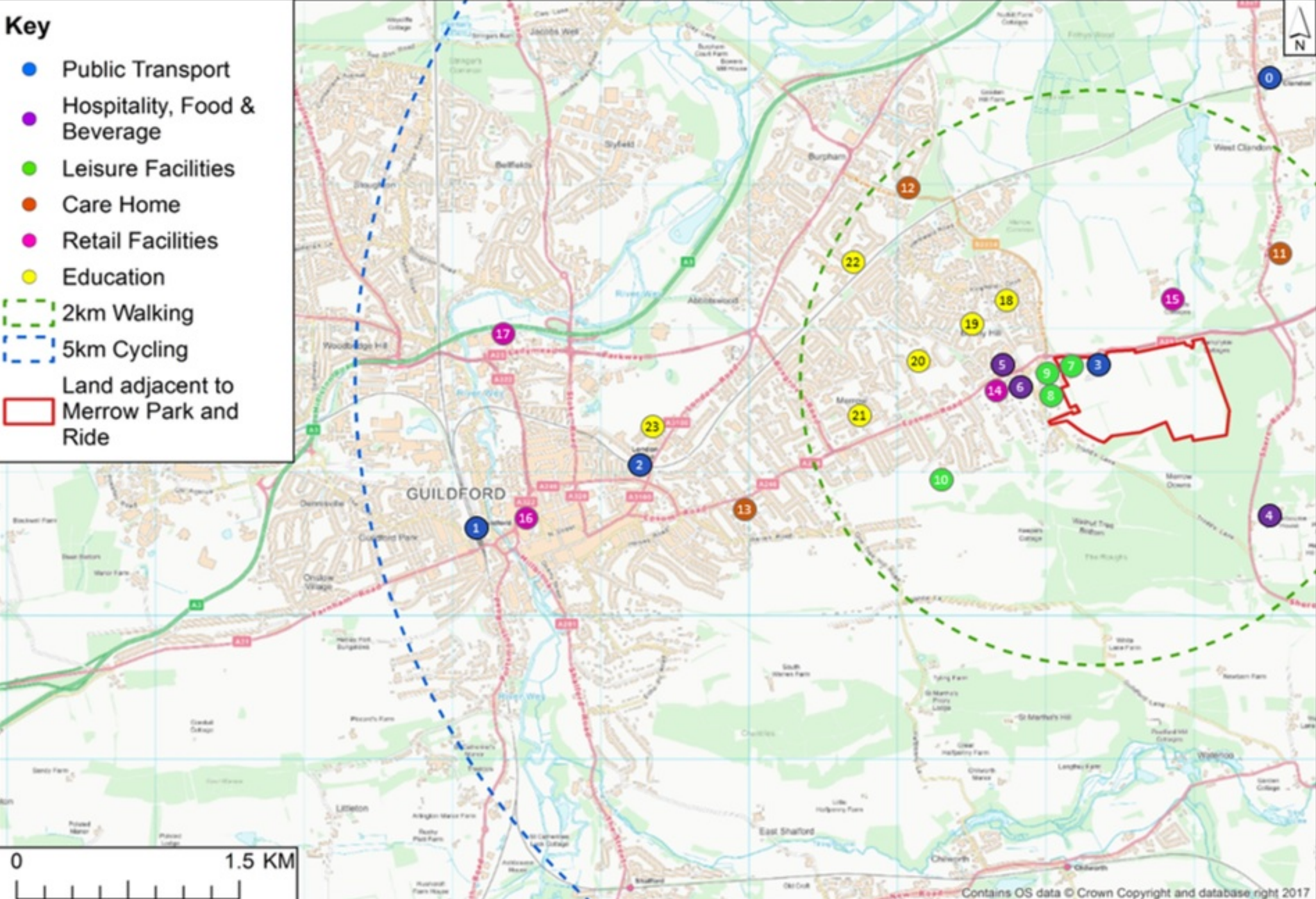
Overall, the Council can be confident that making provision for some of Woking's unmet needs will:

- a help address the needs of Woking which have been accruing since 2013 and should be addressed as soon as possible; and
- b not prejudice future plan-making in the HMA given the reasonable likelihood that overall needs will increase when all three authorities' Plans are next reviewed.

## **APPENDIX 2**

# Key

- Public Transport
- Hospitality, Food & Beverage
- Leisure Facilities
- Care Home
- Retail Facilities
- Education
- 2km Walking
- 5km Cycling
- Land adjacent to Merrow Park and Ride



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## Public Transport

- 0. Clandon Station
- 1. Guildford Station
- 2. London Road Station
- 3. Merrow Park & Ride

## Hospitality, F&B

- 4. Manor House Hotel
- 5. Ashuka Tandoori
- 6. The Horse & Groom

## Leisure Facilities

- 7. Merrow Cricket Club
- 8. Sportsdirect Gym
- 9. Merrow Tennis Club
- 10. Guildford Golf Club

## Care Homes

- 11. Ashley Park Home
- 12. Mallow Crescent
- 13. Albury Care Home

## Retail Facilities

- 14. Merrow Road Shops
- 15. Clandon Park Garden Centre
- 16. The Friary Shopping Centre
- 17. Ladymead Retail Park

## Education Facilities

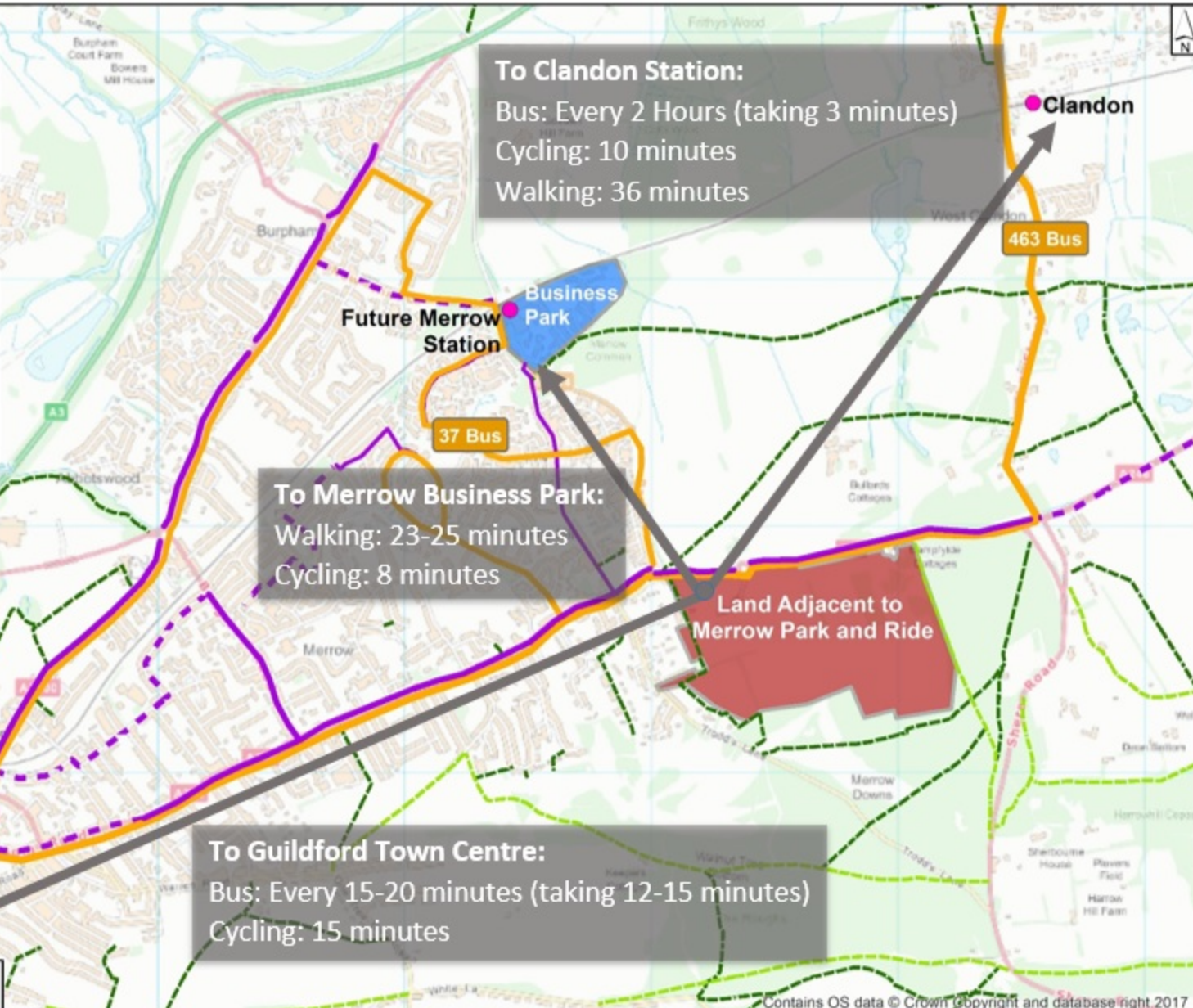
- 18. Merrow Infant School
- 19. Bushy Hill Junior
- 20. St Peter's
- 21. St Thomas Primary
- 22. George Abbott Secondary
- 23. Guildford High School

# Key

- Rail Station
- Bus Routes
- Existing Cycle Route
- - - Suggested Cycle Improvements

# Public Rights of Way

- Bridleway
- - - Footpath
- Business Park
- Guildford Town Centre
- Land adjacent to Merrow Park and Ride



## **APPENDIX 3**

## Guildford Local Plan Examination: Matter 9.2

## Guildford Borough Green Belt and Countryside Study: Findings for Draft Strategic Development Sites and Potential Developable Area on land adjacent to Mellow Park and Ride

Site / Land Parcels	Contribution to Green Belt					Contribution to Green Belt					Potential Development Areas	Comments
	Guildford Borough Green Belt and Countryside Study, February 2013					Guildford Borough Green Belt and Countryside Study: Addendum, April 2014					Volume II - Stage 4 Assessment	
	Volume II – Land surrounding the Urban Areas of Guildford, Ash and Tongham					Volume II -Addendum					Volume V - Section 22: New Settlement at Wisley Airfield	
	<b>Purpose 1</b> To check the unrestricted sprawl of large built-up areas	<b>Purpose 2</b> To prevent neighbouring towns from merging into one another	<b>Purpose 3</b> To assist in safeguarding the countryside from encroachment	<b>Purpose 4</b> To preserve the setting and special character of historic towns	<b>Overall Score</b>	<b>Purpose 1</b> To check the unrestricted sprawl of large built-up areas	<b>Purpose 2</b> To prevent neighbouring towns from merging into one another	<b>Purpose 3</b> To assist in safeguarding the countryside from encroachment	<b>Purpose 4</b> To preserve the setting and special character of historic towns	<b>Overall Score / Green Belt Sensitivity</b>	Includes identification of potential new Green Belt boundaries	
<b>Gosden Hill</b>												
Land Parcel C1	Contributes Checks eastern sprawl from Guildford	Does not contribute	Does not contribute	Does not contribute	1	Contributes Checks north east sprawl of Guildford	Does not contribute	Contributes	Does not contribute Although preserves setting of Clandon Park	2 Medium Sensitivity	Land within parcel identified as PDA	Contribution to setting of Clandon Park has not been scored as contributing to Purpose 4
Land Parcel C2	Contributes Checks eastern sprawl from Guildford	Contributes	Does not contribute	Does not contribute	2	Contributes Checks north east sprawl of Guildford	Does not contribute	Contributes	Does not contribute	2 Medium Sensitivity	Parcel identified as PDA	
Land Parcel C3	Does not contribute	Contributes Prevents merging of Guildford and West Clandon	Does not contribute	Does not contribute	1	Does not Contribute	Contributes Prevents merging of Guildford and West Clandon	Contributes	Does not contribute Although preserves setting of Clandon Park	2 Medium Sensitivity	Land not included in PDA	Contribution to setting of Clandon Park has not been scored as contributing to Purpose 4
<b>Blackwell Farm</b>												
Land Parcel H1	Contributes Checks western sprawl from Guildford	Does not contribute	Does not contribute	Does not contribute	1	Contributes Checks western sprawl from Guildford	Does not contribute	Contributes Minimal existing development	Contributes Preserves setting of Guildford historic town	3 High Sensitivity	Parcel identified as PDA	
Land Parcel H2	Contributes Checks western sprawl from Guildford	Does not contribute	Does not contribute	Does not contribute	1	Contributes Checks western sprawl from Guildford	Does not contribute	Contributes Minimal existing development	Does not contribute	2 Medium Sensitivity	Western area of parcel identified as PDA	
Land Parcel H4	Does not contribute	Contributes Prevents merging of Flexford and Wood Street	Does not contribute	Does not contribute	1	Does not contribute	Does not contribute	Contributes Minimal existing development	Contributes Preserves setting of Guildford historic town	2 Medium Sensitivity	Land not included in PDA	
<b>Wisley Airfield</b>												
Land Parcel C18	Does not contribute	Does not contribute	Contributes	Contributes Preserves the setting of Ockham Conservation Area	2	Does not contribute	Does not contribute	Contributes Minimal existing development	Contributes Preserves setting of Ockham historic village	2 Medium Sensitivity	Airfield identified as PMDA (Potential Major Development Area)	Includes further assessment of contribution to Green Belt purposes. Recognises impacts on Purpose 3 and Openness.
<b>Land adjacent to Mellow Park &amp; Ride</b>												
Land Parcel E1	Contributes Checks eastern sprawl of Guildford	Does not contribute	Does not contribute	Does not contribute	1	Contributes Checks eastern sprawl of Guildford	Does not contribute	Contributes Minimal existing development	Contributes Preserves setting of East Clandon historic village and Clandon Park	3 High Sensitivity	Land adjacent to Mellow park and ride identified as PDA	Setting of Clandon Park has been included in assessment of contribution to Purpose 4

