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**Guildford Borough
Local Plan:
Strategy and Sites**

Written Statement

Land at Foxburrow Hill Road,
Guildford

On behalf of

Mr Robert Howard

Prepared by

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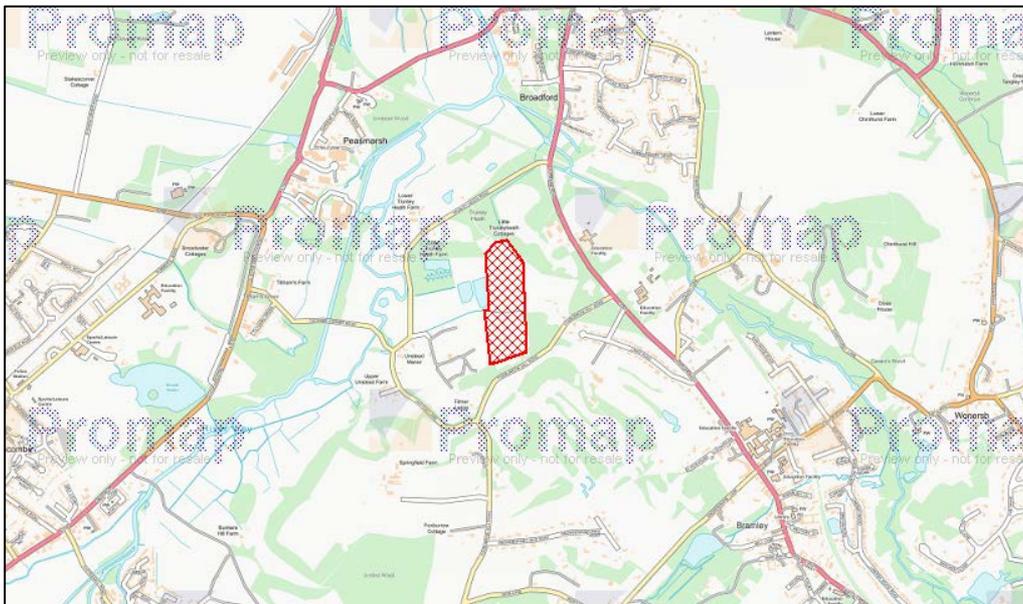
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1. INTRODUCTION – THE SITE

- 1.1 Lambert Smith Hampton has been appointed by Mr Robert Howard to submit a Written Statement in response to the Inspector’s Matters and Issues for Examination in respect of the Guildford Borough Local Plan: Strategy and Sites Submission Document.
- 1.2 This Statement specifically addresses Matter 4 (Housing Trajectory), Matter 6 (Homes for All) and Matter 9 (Spatial Strategy, Green Belt and Countryside Protection).
- 1.3 Our client has land interests in the southern part of the Borough, immediately adjacent to the boundary with Waverley Borough Council and close to the settlement of Bramley. A site location plan is provided below:



Land at Foxburrow Hill Road

- 1.4 The site is in a sustainable location for housing development given its relationship to existing settlements and close proximity to local services and public transport links. In particular, the site may have the potential to deliver a variety of housing types (including affordable) to meet the needs of the ageing population and the family housing market, for which there is significant projected growth identified.

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- 1.5 The site was formerly used as a sewage works and therefore can be considered as previously developed land within the Green Belt. According to the Council's Green and Belt and Countryside Study (2013), the site is within an area of Green Belt (Ref: F4) identified as an area of "low sensitivity". The site also scores 0 with regard to serving Green Belt purposes.

2. *Inspector's Matters and Issues for Examination*

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?

- 2.1 Policy S2 of the Council's Plan sets out the Borough's annualised housing completion target at 654 homes per annum. However, this is spread across a phased target that gradually increases over time from 450 to 850 homes per annum.
- 2.2 Since May 2012 the Council have been using an interim housing number of 322 homes a year. As such the cumulative net delivery of dwellings across the Borough between 2012 and 2017 should be at or around 1,610 units (five years x 322 units). It is, therefore, highly notable that according to the Borough Council's published Annual Monitoring report (AMR) November 2017, the annualised (net) housing completion figures have been as follows:

Year	Target	Completions (Net)
2012/ 2013	322	234
2013/ 2014	322	137
2014/ 2015	322	242
2015/ 2016	322	388
2016/ 2017	322	294
TOTAL	1,610	1,295

- 2.3 The above table demonstrates the performance of housing delivery across the Borough has been significantly short of the existing annualised target which itself is less than half of the annualised target set out in the Submitted Local Plan. Indeed, the period between 2012 and 2017 shows there has been a cumulative shortfall of 315 units when compared against the annualised interim housing completion target. Therefore, the Council are currently some way short of meeting the annualised target in the submitted Local Plan.
- 2.4 It is also worth noting that a similar level of housing delivery was recorded in the years 2007 to 2012 (1,287 units over five years) which represents a further significant shortfall when measured against the interim annualised housing target. As such, the Council's Annual Monitoring Report clearly demonstrates a history of persistent under delivery.
- 2.5 In relation to the Council's historic shortfall in housing delivery, it should also be factored in that the Borough Council has removed areas of safeguarded land previously identified from the Submission Document without any justification. As a consequence the longer land reserve has severely diminished and the flexibility and contingency with the Plan has been significantly reduced. Given their historic record of under delivery, we consider that it is necessary for the Council to identify areas of safeguarded land within the Green Belt to ensure contingency measures are in place if the Council are unable to meet housing delivery targets through the identified allocations. We therefore consider that the housing trajectory as set out in Policy S2 is highly unrealistic without the identification of areas of safeguarded land to ensure the delivery of the housing targets.

Matter 6: Homes for All

Are the plan's policies sound and effective in delivering a wider variety of quality homes to provide for the needs of all the community? Relevant Issues are:

6.1 The plan's proposals in respect of a mix of sizes and types of homes, including family homes and homes for older people.

- 2.6 The Council's SHMA shows that there is a clear need to respond to the growing housing demand in the Borough. We are particularly concerned that the reduction in the number of homes delivered on Green Belt land and the increase of housing numbers on brownfield sites will result in the Council delivering a significant proportion of high density residential schemes and a limited future supply of family housing for which there is already an acute shortage.
- 2.7 The housing sites identified in the Submission document demonstrate an over-reliance on brownfield sites which are more likely to deliver high density residential development and little in the way of family and affordable housing. In contrast, green field sites would provide more

certainty in terms of availability and deliverability, especially in relation to securing a range of dwelling types and sizes that meet the diverse housing needs of the Borough. Indeed, such sites are not subject to the same financial viability issues which affect so many urban sites. Whilst the Council may argue that the delivery of brownfield sites may protect the existing Green Belt, such a strategy would almost certainly undermine the need to deliver the mix of sizes and types of homes, including family homes and homes for older people.

- 2.8 With regards to dwelling mix, we note that the Council's SHMA 2015 and Addendum Report 2017 shows that there is a need for 10% one bedroom, 30% two bedroom, 40% three bedroom and 20% four bedroom market homes. The Borough also has an ageing population with a significant projected growth in the over 65 year olds and an estimated need for 1,061 specialist homes accommodation for older people over the plan period. As such, there is a clear danger that the above mix will not be met if the Council seek to increase the number of units on previously developed sites in urban areas which will primarily deliver high density one and two bedroom flats.
- 2.9 Whilst we do not object to the redevelopment of each and every residential site within the urban area, it is nevertheless the case that a strategy of seeking to maximise urban opportunities purely to avoid the release of sites within the Green Belt would have a negative impact on the delivery of the necessary mix and types of units.

Matter 9: Spatial Strategy, Green Belt and Countryside Protection

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

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

- 2.10 As we have noted above, we are particularly concerned about the lack of flexibly and contingency within the Plan. In this respect, we strongly object to the lack of safeguarded land and believe it is vital that the Borough identify suitable safeguarded sites within the Local Plan.
- 2.11 As noted in the NPPF (paragraph 85), LPAs should, where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer term development needs stretching well beyond the plan period. In the case of Guildford Borough Council, we strongly believe this is necessary particularly given the severe housing shortage, the Council's record of persistent under delivery and the proportion of Green Belt land within the Borough (89%).

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- 2.12 Whilst we acknowledge the loss of Green Belt land is politically unpopular, what is needed in the forthcoming Local Plan is the foresight to identify an appropriate range of sites which will cater for the diverse and growing needs of the Borough's population and provide a degree of certainty going forward. In this respect, the identification of safeguarded land will guard against the persistent under delivery of housing and would provide the necessary flexibility and contingency within the Local Plan to ensure housing targets are delivered within the Plan period.
- 2.13 As noted in section 1 of this statement, our client's site represents a suitable site for housing development to meet the needs of the ageing population and the family housing market.