



The Planning Inspectorate

Report to Guildford Borough Council

by Jonathan Bore MRTPI

an Inspector appointed by the Secretary of State

Date: 27 March 2019

Planning and Compulsory Purchase Act 2004

(as amended)

Section 20

Report on the Examination of the Guildford Borough Local Plan: strategy and sites

The Plan was submitted for examination on 13 December 2017

The examination hearings were held between 5 June 2018 and 5 July 2018 and on 12 and 13 February 2019.

File Ref: PINS/Y3615/429/11

Abbreviations used in this report

AGLV	Area of Great Landscape Value
AONB	Area of Outstanding Natural Beauty
CJEU	Court of Justice of the European Union
CHP	Combined Heat and Power
dpa	Dwellings per annum
ELNA	Economic Land Needs Assessment
HRA	Habitats Regulations Assessment
LEP	Local Enterprise Partnership
MM	Main Modification
NPPF	National Planning Policy Framework
OAN	Objectively assessed need
ONS	Office for National Statistics
PPG	Planning Practice Guidance
R&D	Research and Development
RIS	Road Investment Strategy
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SANG	Suitable alternative natural greenspace
SHMA	Strategic Housing Market Assessment
SPA	Special Protection Area
WMS	Written Ministerial Statement

Non-Technical Summary

This report concludes that the Guildford Borough Local Plan: strategy and sites provides an appropriate basis for the planning of the Borough, provided that a number of main modifications (MMs) are made to it. Guildford Borough Council has specifically requested me to recommend any MMs necessary to enable the Plan to be adopted.

The MMs were subject to public consultation over a six-week period and were subject to sustainability appraisal by the Council. Since that consultation took place MM2 has been revised, relating to Policy S2 *Planning for the Borough* with a reduced housing requirement of 562 dwellings per annum (dpa). This is discussed under issue 1. I have amended the wording of other MMs where necessary. I have recommended the inclusion of all but 5 MMs in the Plan after considering all the representations made in response to consultation on them.

The Main Modifications can be summarised as follows:

- Modifications to the overall housing requirement and the annualised target taking into account the latest household projections and other relevant factors
- Modifications to give stronger encouragement towards town centre development to make the most effective use of brownfield land in accessible locations and to provide a range of uses including residential development
- Modifications to ensure that the plan promotes good urban design practice in accordance with the NPPF and Planning Practice Guidance
- Modifications to ensure that policies relating to Green Belt and Heritage are in accordance with the NPPF
- Modifications to ensure that the range of policies governing different categories of development are clear and effective
- Modifications to ensure that the impacts of various site allocations are adequately mitigated.

Introduction

1. This report contains my assessment of the Guildford Borough Local Plan: strategy and sites in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the Duty to Co-operate. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework 2012 (paragraph 182) makes it clear that, in order to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy.
2. A new National Planning Policy Framework (NPPF) was published in July 2018 with revisions in February 2019. The new NPPF includes a transitional arrangement in paragraph 214 whereby, for the purpose of examining this Plan, the policies in the 2012 Framework will apply. Similarly, where the Planning Practice Guidance (PPG) has been updated to reflect the revised NPPF, the previous versions of the PPG apply for the purposes of this examination under the transitional arrangement. Unless stated otherwise, references in this report are to the 2012 NPPF and the versions of the PPG which were extant prior to the publication of the 2018 NPPF.
3. The starting point for the examination is the assumption that the local planning authority has submitted what it considers to be a sound plan. The Guildford Borough Local Plan: strategy and sites, dated and submitted in December 2017, is the basis for my examination. It is the same document as was published for consultation from 9 June to 24 July 2017.

Main Modifications

4. In accordance with section 20(7C) of the 2004 Act, the Council requested that I should recommend any main modifications [MMs] necessary to rectify matters that make the Plan unsound or not legally compliant and thus incapable of being adopted. My report explains why the recommended MMs are necessary. The MMs are referenced in bold in the report in the form **MM1**, **MM2**, **MM3** etc, and are set out in full in the Appendix.
5. Following the examination hearings, the Council prepared a schedule of proposed MMs and carried out a sustainability appraisal (SA) of them. The MM schedule was subject to public consultation for six weeks between 11 September and 23 October 2018. I have taken account of the consultation responses in coming to my conclusions in this report.
6. At the end of the main modifications consultation period, the Council requested a revision to **MM2** (Policy S2: *Planning for the borough*) with a lower housing requirement of 562 dwellings per annum (dpa). This arose from the latest household projections, which were published during the consultation period for the main modifications. For the reasons set out under Issue 1 below, I am recommending the adoption of this revised version of MM2.
7. Further consultation and further sustainability appraisal in respect of revised MM2 are not necessary for two main reasons. Firstly, it has already received adequate publicity. The Council's supporting documents were added to the website in October 2018; statements were invited from interested persons from 20 December 2018 to 24 January 2019; about 30 statements were

received, some with detailed technical appendices; and the matter was discussed in two days of hearings on 12 and 13 February 2019 with many participants and observers. Secondly, the overall housing provision arising from this requirement falls within the range of options examined by the sustainability appraisal and the Plan's allocations remain essentially the same as in the submitted version, with relatively minor adjustments to take into account updated evidence. No-one is likely to be prejudiced as a result of this version of MM2 not having featured in previous participatory processes.

8. In the attached schedule of main modifications, the wording of MM6 relating to Policy H2 *Affordable homes* contains differences from the version consulted upon. This is to bring the thresholds for affordable housing into compliance with national policy for transitional plans, and is dealt with below under Issue 2. It does not significantly alter the content of the modification as published for consultation or undermine the participatory processes or sustainability appraisal that has been undertaken.
9. I am not recommending the adoption of five main modifications: four additional housing sites and a Green Belt boundary change. These are discussed under Issue 11.

Policies Map

10. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, the Council is required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan. In this case, the submission policies map comprises the set of plans in Appendix H of the Plan.
11. The policies map is not defined in legislation as a development plan document. Its role is to illustrate geographically the application of policies in the plan. If the geographic illustration of a policy is flawed, the policy will be unsound. In such circumstances, therefore, the Council will need to draw up a proposed change to the submission policies map. This is the case for example in respect of the site of nature conservation interest in Policy A35 *Former Wisley airfield* (MM50) which is dealt with later under Issue 10; and certain other published MMs to the Plan's policies require corresponding changes to the policies map. These changes were published for consultation alongside the MMs. However, the Council's proposed change to the policies map in respect of the Green Belt boundary at West Horsley in **MM51** is not required for soundness and should not be adopted; this is addressed under Issue 11. The same applies to the changes to the Policies Map in respect of the additional site allocations that were included as MMs. These were Land at Aaron's Hill, Godalming (**MM39**: A61); Land at Hornhatch Farm, adjoining New Road, Chilworth (**MM43**: A62); Land west of Alderton's Farm, Send Marsh Road, Send (**MM44**: A63); and Land between Glaziers Lane and Strawberry Farm, Flexford (**MM45**: A64).
12. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Council will need to update the adopted policies map to include all the changes proposed in the Guildford Local Plan:

strategy and sites and the further changes published alongside the MMs incorporating any necessary amendments identified in this report.

Assessment of Duty to Co-operate

13. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on it by section 33A in respect of the Plan's preparation.
14. The Council is a signatory to the Local Strategic Statement for Surrey, with its strategic objectives to support economic prosperity, meet housing needs, deliver infrastructure and support environmental sustainability, natural resource management and the conservation and enhancement of the character and quality of the countryside and Green Belt. It has engaged with the Strategic Spatial Planning Liaison Group.
15. The Council has worked with Waverley and Woking Councils to produce the West Surrey SHMA and produced a statement of common ground on housing delivery, and it has cooperated with Surrey County Council and a range of other authorities to assess the need for specialist housing and gypsy and traveller accommodation.
16. Guildford Borough sits within the Enterprise M3 Local Enterprise Partnership (LEP) which runs across parts of Hampshire and Surrey. The Local Plan has had regard to the LEP's Strategic Economic Plan and the EM3 LEP Growth Deal. The Council is a member of other Surrey-wide groups with the aim of cooperating on housing delivery, infrastructure and economic development and has worked with the other local authorities in the relevant Functional Economic Market Area to assess development needs. The Retail and Leisure Needs Study Update 2014 and its 2017 addendum also required cooperation with a number of different councils.
17. On transport matters, the Council has worked with the County Council, Highways England, Network Rail, the train operating companies and bus and community transport operators, and a range of local authorities and the Enterprise M3 LEP through an extensive number of working groups and stakeholder meetings.
18. A stakeholder forum was held to discuss the methodology and data used in the Green Belt and Countryside Study (GBCS) and this ensured that the broad methodology used was consistent with that used by other authorities in Surrey.
19. The Council has cooperated with the four neighbouring councils and the County Council in the preparation of the AONB Management Plan by the Surrey Hills AONB Board, and with Natural England and the Local Nature Partnerships in respect of biodiversity and it is a member of the Thames Basin Heaths Joint Strategic Partnership Board. It has worked closely with Natural England and has engaged with other authorities in respect of the provision of Suitable Alternative Natural Greenspace (SANG) to enable development to take place in the right places. The Council has worked closely with the

Environment Agency in preparing the flood risk evidence base that underpins the Plan.

20. Overall I am satisfied that where necessary the Council has engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the Duty to Co-operate has therefore been met.

Assessment of Soundness

Main Issues

21. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings I have identified 11 main issues upon which the soundness of the Plan depends. Under these headings my report deals with the main matters of soundness and legal compliance rather than responding to every point raised by representors. Policies and designations that do not raise main issues and are considered sound have not been referred to in the report.

Issue 1 – Whether the Plan makes adequate provision for new housing

Calculating the housing requirement

22. Policy S2 *Planning for the borough – our spatial development strategy* in the submitted Plan made provision for at least 12,426 homes over the plan period which amounted to an annualised rate of 654 dwellings per annum (dpa) over 19 years, but on a stepped trajectory. The submitted Plan's housing requirement was based on the work of the West Surrey Strategic Housing Market Assessment (SHMA) Guildford Addendum Report 2017, which took into account the 2014-based Population and Household Projections and the 2015 Office for National Statistics (ONS) Mid-Year Population Estimates. The methodology included an adjustment for economic-led housing needs based on a 0.7% per annum jobs growth rate, and adjustments for affordability, the suppression of household growth among younger households, and the growth of the University of Surrey. Whilst the general methodology was sound (a matter I return to below), the stepped trajectory delivered housing at a low rate for several years from the date of adoption, thus falling short of addressing the borough's deteriorating housing affordability and housing needs in the early years of the Plan. Moreover there was no allowance for unmet need from Woking Borough.
23. During the course of the examination, in May 2018, the 2016 sub national population projections were released. Projected population growth was lower than the 2014 projections, with reduced international migration and a downward adjustment for natural change. Applying the same methodology to the 2016 population projections and the 2017 mid-year estimates, but using an employment growth figure of 0.8% per annum to better reflect the evidence of past employment growth, resulted in an OAN of 629 dpa. To boost the early supply of housing, the stepped trajectory of the submitted plan was abandoned and four additional housing sites were allocated in the main

modifications. An allowance of 42 dwellings per annum was added from 2019 to contribute towards meeting unmet housing needs in Woking Borough. The (now superseded) version of MM2 therefore established the housing requirement as 630 dpa for the first four years of the plan period, 2015/16 to 2018/19, rising to 672 dpa from adoption in 2019/20.

24. The position changed again in September 2018, after the public consultation on the main modifications had begun. The ONS 2016-based household projections were published and the Council were invited to consider their impact. Submissions were invited from interested persons and two days of hearings were held, on 12 and 13 February 2019, to discuss the matter. The Council reformulated the Borough's housing requirement using the 2016-based household projections as a starting point, employing the same methodology as the previous calculations (GBC-LPSS-033b). The outcome is a housing requirement of a minimum of 562 dpa, or 10,678 homes during the plan period to 2034. This is the housing requirement figure now incorporated into **MM2**. There is no stepped trajectory or allowance in the figure for unmet need from Woking, although the latter is capable of being accommodated within the headroom between the requirement and the overall level of provision, a point I return to later.
25. Before going on to look at how this figure has been arrived at, it is necessary to consider the appropriateness of using the 2016-based household projections as a starting point for the Guildford Borough Local Plan. On 20 February 2019 the Government updated the Planning Practice Guidance (PPG) to advise the use of 2014-based household projections when using the standard method for calculating local housing need. All participants to the examination were fully aware of the consultation that led to this revision, and the issues in respect of the 2014 and 2016-based household projections were comprehensively discussed at the hearings. However, as a transitional plan being examined against the 2012 NPPF, the housing requirement in the Guildford Borough Local Plan is not derived from the standard method. Moreover, the plan's housing requirement in MM2 is based on a methodology that makes a range of significant adjustments to allow for factors such as household formation rates, jobs-related growth and other local issues which are discussed in more detail below. As such, the Council's latest housing figure in MM2 is an up to date assessment of housing need based on several inputs, in accordance with the policy framework appropriate for transitional plans. In consequence it does not conflict with the letter or the spirit of the revised NPPF.
26. Turning to the detail, the latest household projections indicate that the demographically-based starting point for housing need is 313 dpa. This projection is based on data points in 2001 and 2011, whereas previous projections were based on a longer time series starting in 1971. Social conditions have changed since 1971 and it is generally better to use more recent data, but the latest projections are rooted in a time of acknowledged deterioration in housing affordability, which is likely to have had a potential impact on household formation rates among younger people. Whilst several factors influence household formation, including social behaviour, job prospects and the availability of credit, a fundamental factor is whether people can afford to buy or rent a home or whether an affordable home is available, and affordability in turn is influenced by the availability and growth of the housing stock. The Council's methodology recognises these issues by making

an adjustment to household formation rates for the 25 to 44 age groups, returning them to the levels seen in 2001. Applying this adjustment results in a demographic adjustment to 396 dpa. This is a sound approach, although it should be recognised that it does not provide a full adjustment for affordability, since the additional dwellings are available to all, not just the 25 to 44 age group, and it is unlikely to increase the stock sufficiently to have a significant effect on affordability on its own.

27. The Council's methodology then makes a further adjustment for jobs-related housing need, which raises the OAN to 539 dpa. Guildford, like other successful towns and cities, is a focus point for economic growth which generates a need for housing for those working there. The SHMA: Guildford Addendum Report 2017 considered workplace employment estimates for employment sectors; applied an average annual compound growth rate of 0.7% from three projections for the period 2015 to 2034, and considered economic participation rates and other relevant factors, with the conclusion that the economy could be expected to support higher in-migration. This was the approach that underlay the submitted plan's housing figure. The calculation underlying MM2 takes a similar approach but uses a growth rate of 0.8% pa which more closely reflects the known growth of 0.96% pa in Guildford over the last 16 years, rather than the 0.7% pa behind the housing requirement in the submitted Plan. The rate of 0.96% pa has been achieved over a period which includes notable shorter-term fluctuations in the economic cycle, including the recession which started in 2008/09, so the figure of 0.8% pa therefore appears robust and cautious in relation to that performance.
28. Planning needs to have regard to longer term population changes and business growth rather than short term cycles in the economy and it would be wrong of the plan to place undue weight on some of the current pessimistic short-term economic predictions. The Council's approach underpinning MM2 is based on well-founded and sound analysis; any divergent trends that become established can be picked up through monitoring, and if such trends affect housing affordability they will be addressed through the standard method calculation of local housing need when the plan is next reviewed.
29. From the figure of 539 dpa resulting from the assessment of jobs-led economic growth, the Council have made a further adjustment of 23 dpa for the growth of the student population based on analysis carried out in the SHMA addendum. Taking the University of Surrey's known aspirations for growth, it is estimated that the number of full-time Guildford-based students at the University will increase by 3,800 between 2015-34, resulting in additional migration to Guildford. Assuming that 45% would be accommodated in the wider housing market, and on the basis of an average 4 students per household, the SHMA Addendum calculates that this would equate to growth of 23 additional dwellings per annum. It has been argued that the 18 to 23 age group in the most recent population projections and mid-year estimates includes students; but this cannot be assumed to be the case, and by its nature Guildford is likely to be attractive to young people whether or not they are students. It is a sound step to add this allowance for students when considering the overall housing requirement, to ensure that there is not a significant incursion of students into the housing market which would diminish the supply available to others needing housing in the area.

30. The housing requirement of 562 dpa is the outcome of this methodology. The question arises as to whether there should be a further adjustment for affordability on top of the adjustments for jobs growth and students. Guildford's lower quartile housing affordability ratio stood at 12.76 in 2017, up from 10.9 in the 2015 SHMA. This represents a pressing affordability problem both in absolute terms and as a trend. However, the figure of 562 dpa (including students) amounts to a 79% uplift over the demographic starting point of 313 dpa and is a significant increase above historic housing delivery rates; it can be expected to improve affordability and will boost the supply of housing in accordance with Government policy.
31. As regards affordable housing need, the 2017 SHMA Addendum identifies that this amounts to 517 dwellings per annum across the plan period. When set against the proposed affordable housing requirement of 40%, the Council would need to deliver almost 1,300 dwellings per annum to meet affordable housing need in its entirety. It would not be practicable to seek the delivery of 1,300 homes a year or appropriate to increase the uplift above the starting point beyond 79%, but it is further evidence of a pressing housing need and it lends strong support to the figure of 562 dpa rather than a lower requirement.
32. In assessing housing need using several statistical sources and projections, it is inevitable that the output will be affected by the assumptions made. The figures can be influenced by different assumptions about economic activity rates, unemployment levels, net commuting, double jobbing, the age profile of additional migrants into the area, students, the proportion of working age people within the overall age profile and the ability of the wider labour force to support the anticipated level of jobs-related in-migration. Combinations of different assumptions producing lower figures have been submitted to the examination. Other assumptions produce higher figures.
33. But an examination of the wider context supports a housing requirement of 562 dpa. Guildford is an important employment centre within easy reach of London, with a big university, other significant higher education establishments, a successful science park, economic strength in growing sectors and a long record of economic growth. It is the largest town within the housing market area, one of four growth towns in the LEP's Strategic Economic Plan and continues to benefit from the EM3 LEP Growth Deals. The university is expanding and students have made a significant incursion into the housing market. These factors, together with the seriously poor and deteriorating housing affordability and the very high level of need for affordable housing make a compelling case for a supply of housing significantly above historic rates.
34. 562 dpa is also a realistic figure in comparison with the housing requirements of the two other authorities in the housing market area. Woking's requirement was 517 dpa in the 2015 SHMA, and its local housing need has been calculated at 409 dpa against the standard method (see below). The town has a strong business sector but has a smaller district than Guildford. Waverley, a larger district but with smaller towns than Guildford, has a requirement of 507 dpa plus an additional 83 dpa uplift for Woking's unmet housing need.
35. The housing requirement of 562 dpa in MM2 is therefore consistent with the characteristics of Guildford, its District and the wider context, and points

towards the soundness of the Council's methodology. A lower housing requirement such as the 361 dpa set out in NMSS/WAG REP 17457825-003 would not have regard to the reality of Guildford's characteristics or its context, would pose a risk to local economic prospects and plans, would not adequately address housing affordability or the availability of affordable housing, would potentially increase the rate of commuting, and would be inconsistent with the assessed housing need of the other authorities in the housing market area. A higher requirement would imply a scale of uplift which would start to become divorced from the demographic starting point and from the context of the housing market area described above.

36. Finally, in establishing the housing requirement, it is necessary to consider the issue of unmet housing need from Woking. The 2015 SHMA calculated Woking's housing need at 517 dpa, but Woking's Core Strategy made provision for 292 dpa leaving unmet need of 225 dpa. The adopted Waverley Borough Local Plan's housing requirement incorporates 83 dpa which, over the life of the Waverley Borough Local Plan (which is longer than Woking's Core Strategy) would meet 50% of Woking's unmet need as identified through the SHMA. The submitted version of the Guildford Borough Local Plan did not address Woking's unmet need, but the original version of MM2 accommodated a further 42 dpa.
37. On 18 October 2018, Woking Borough Council formally reviewed their Core Strategy and concluded that it did not need updating. They also re-calculated local housing need; using the standard method with 2014-based household projections, they consider this to be 409 dpa. The use of 2014-based figures for Woking is appropriate in the light of the Government consultation and response. Housing provision in the borough is unchanged at 292 dpa which reflects average delivery over the last few years, a result of limited land availability within the Borough's tightly drawn administrative area. The various plans in the housing market area are operating on different timescales which makes it more difficult to establish exact figures, but having regard to the difference between local housing need and provision in Woking, the probability is that there is still ongoing unmet need from Woking, not all of which is accommodated by the allowance in Waverley.
38. However, it is unnecessary to make a specific allowance in Guildford's housing requirement to help meet unmet need from Woking. That is because the likely residual amount of unmet need from Woking can be accommodated within the Guildford Borough Local Plan's headroom – the difference between the housing requirement of 562 dpa and the number of homes that can be delivered from all sources over the life of the plan. This is dealt with in the next section.

Delivering an adequate supply of homes

39. In the submitted plan, the combined effect of the stepped trajectory in Policy S2 together with the "Liverpool" methodology (in which the delivery shortfall accumulated over the first 4 years of the plan (2015/16 to 2018/19) is spread over the whole plan period), would have deferred a significant proportion of the housing requirement to the later years of the plan. Set against the (then higher) housing requirement, this would not have met the Government's objective to boost the supply of housing in the shorter term.

40. To address this, the earlier version of MM2 deleted the stepped trajectory, and to improve shorter term delivery (again in the context of a higher housing requirement) four additional site allocations were included as MMs. These were Land at Aaron's Hill, Godalming (**MM39**: A61); Land at Hornhatch Farm, adjoining New Road, Chilworth (**MM43**: A62); Land west of Alderton's Farm, Send Marsh Road, Send (**MM44**: A63); and Land between Glaziers Lane and Strawberry Farm, Flexford (**MM45**: A64).
41. The housing requirement is now lower, as set out in the current version of MM2 and, in consequence, neither a stepped trajectory nor the additional sites are required to maintain adequate delivery in the shorter term against the requirement. The housing trajectory in **MM46 Appendix 1**, based on 562 dpa and the latest available delivery information, illustrates this point. Whilst housing delivery over the first 4 years of the plan period has been very low, and is still below the Plan's housing requirement in year 5, it grows strongly from 2020/21 and remains in excess of the housing requirement over the life of the Plan.
42. The housing trajectory indicates that there is potential to deliver 14,602 homes over the plan period. The difference between this and the total housing requirement of 10,678 homes has been raised during the examination in the context of whether there are exceptional circumstances to release land from the Green Belt. This is dealt with in more detail under Issue 5. But purely in terms of housing supply, there is enough headroom to ensure that the Plan remains robust in the event that there is slippage in the delivery of housing from the allocated or committed sites, avoiding the need to allocate reserve sites; and enough headroom to provide for the anticipated level of unmet need from Woking, bearing in mind that there would be a continuing level of undersupply over the period of Woking's newly reviewed plan. The overall plan provision would also provide more affordable housing and go further to address serious and deteriorating housing affordability.
43. The reduced housing requirement in MM2 enables the plan to proceed without the additional sites allocated by modifications MM39, MM43, MM44 and MM45, but it is not of an order that would justify the deletion of any of the strategic sites which, in addition to their substantial housing contributions, bring other significant benefits to the Borough through their critical mass and well-chosen locations. Again, this is discussed in more detail under Issue 5.
44. No further sustainability appraisal is required in respect of the requirement of 562 dpa because the overall housing delivery figure of 14,602 homes falls within the range of eight delivery scenarios that were considered as reasonable alternatives, ranging from 13,600 homes to 15,680 homes, and the housing allocations remain the same as in the submitted Plan except for Policy A60: White Lion Walk, added by MM32, a town centre retail and mixed use redevelopment including some 50 dwellings.
45. The trajectory indicates a 5 year housing land supply on adoption of 5.93 years rising to 6.74 years in year 5. The 5 year supply calculation includes a 20% buffer for past persistent under-delivery and uses the Liverpool method in recognition of the contribution made by the strategic allocations which typically have a longer lead-in time. These are the Council's figures and it is recognised that slippage could reduce this supply, but there is enough

flexibility built in to the trajectory to maintain a rolling 5 year housing land supply.

46. In conclusion, whilst the submitted plan's figure of 654 dpa is not sound because it does not reflect the most recent evidence, the Council's calculated housing requirement of 562 dpa, or 10,678 dwellings over the life of the plan, as set out in the revised version of MM2, is sound. It reflects the latest evidence and is based on sound analysis. The overall level of housing delivery, currently calculated at 14,602 homes, will ensure that an adequate 5 year supply of land will be maintained and will ensure that the plan is robust; it will deliver sufficient housing to help address the pressing issues of affordability and affordable housing need, and contribute towards addressing unmet housing need in the housing market area.

Issue 2 – Whether the plan adequately meets the identified housing needs of all the community

47. Policy H1: *Homes for all* establishes the Plan policy towards housing mix, the protection of the housing stock, accessible homes, specialist accommodation, student accommodation, gypsy, traveller and travelling showpeople pitches and plots, houses in multiple occupation and self-build and custom housebuilding.
48. As regards housing mix, the policy is not prescriptive but seeks a mix of tenure, types and sizes of dwelling, which the text indicates will be guided by the strategic housing market assessment. The policy also seeks an appropriate amount of accessible and adaptable dwellings and wheelchair user dwellings.
49. Policy H1(2) of the submitted plan resists the loss of all housing, which is justified given the Borough's housing need, but it also resists the loss of housing on the allocated sites. This is ineffective as a policy because it is not entirely clear whether this means the loss of the housing sites or a reduction in the number of dwellings on the site. **MM4** clarifies the position by stating that significant reductions from the approximate housing numbers or reductions from specific traveller accommodation provision and housing uses as set out in the site allocations will be resisted.
50. Policy H1(6) addresses the needs of gypsies, travellers and travelling showpeople and seeks provision for them on sites of 500 homes or more. This provision is incorporated as a requirement within strategic allocation policies A24, A25, A26 and A35, although the policies fail the test of effectiveness in requiring nil transaction costs from developer to registered provider, since the local planning authority has no authority to determine transaction costs between two independent parties and **MM34** deletes this aspect of the requirement. Meanwhile Policy S2(3) sets out the number of permanent pitches which will be identified for gypsies and travellers and travelling showpeople; the number provided for those who do not meet the definition in Planning Policy for Traveller Sites; and the number to meet the potential additional need of households of unknown planning status. There is a degree of overlap between Policy H1(6) and Policy S2(3) and **MM5** provides clarification by deleting some text from Policy H1(6) and providing additional

explanation in the supporting text. This is required to ensure that the policy is effective. The approach is based on appropriate evidence.

51. Subject to these main modifications, Policy H1 is sound.
52. Policy H2: *Affordable homes* in the submitted plan requires 40% of the homes on sites providing 5 or more homes, or on sites of 0.17 ha or more, to be affordable. However, this does not reflect the Written Ministerial Statement of 28 November 2014 or Planning Practice Guidance 23b-031 which state that local authorities should not request affordable housing contributions on sites of 10 units or less (in other words the threshold is 11 dwellings). **MM6** alters the policy to conform with the Written Ministerial Statement and Planning Practice Guidance and also removes floorspace thresholds which do not have a basis in national policy or guidance. The version of MM6 which was included in the main modifications consultation set the threshold at 10 dwellings which reflects the 2018 NPPF, but the Council have drawn attention to the inconsistency with the Written Ministerial Statement and the Planning Practice Guidance and MM6 has been amended to set the trigger at more than 10 dwellings and to remove the floorspace thresholds in relation to H2(2a) and H2(4) to accord with the policy context for transitional plans being taken forward under the 2012 NPPF. The threshold in Designated Rural Areas is more than 5 dwellings which is acceptable.
53. In the submitted plan, the explanatory text sets out the approach the Council will take in instances where the amount of affordable housing is not economically viable. This is however a policy statement and it should be set out as such. MM6 therefore incorporates it into Policy H2.
54. Policy H3 *Rural exception homes* allows for small scale rural housing developments to meet local affordable housing needs. The explanatory text sets out the approach the Council will take where an element of market housing is required to make a rural exception scheme viable, but again this is a policy statement so **MM7** includes the approach within the policy and brings the policy into line with Planning Policy for Traveller Sites.
55. Subject to the main modifications described above, which are all required for soundness, the plan makes adequate provision to meet the identified housing needs of all the community.

Issue 3 – Whether the Plan adequately meets the business and employment needs of the Borough

56. Policy E1 *Meeting employment needs* aims to create the conditions for delivering 4,100 additional B class jobs by 2034 by allocating land for a net gain of between 36,100 square metres and 43,700 square metres for office B1a and research and development B1b uses and between 3.7ha and 4.1ha of industrial land in use classes B1c, B2 and B8. These figures were derived from the updated Employment Land Needs Assessment (ELNA) of 2017 and were based on a range of employment forecasts, an analysis of changing floorspace and employment rates, employment density and the property market.

57. There is an argument that insufficient floorspace availability has constrained growth and that this has the effect of reducing the growth forecast. However, the ELNA methodology considers the historic perspective against the forecast from different forecasting houses and looks at a set of relationships which capture long term trends in how businesses are changing and how this feeds through into expected growth. A further point is that the forecast converts floorspace using a plot ratio of 0.45 which appears to take into account the potential for both higher and lower development densities depending on site and market circumstances. Assessments of the need for employment land and floorspace, like those for housing, are sensitive to variations in input, but the methodology and assumptions underlying the Plan's requirement appear sound. The ELNA is updated frequently and future updates will ensure that forecast needs of employment land and floorspace remain up to date and that adequate provision is made in future.
58. The table in GBC-LPSS-015 updates the position in respect of supply and need in the Borough, taking into account losses from the business sector and gains from planning permissions. When the site allocations are factored in, the Plan's proposals result in a moderate surplus of B1a and B1b floorspace of 11,735, 8,035 and 4,135 square metres against low, medium and high case growth scenarios respectively. Whilst not substantial, these surpluses demonstrate a robust approach towards floorspace provision within these use classes, which allows for a degree of slippage in delivery and/or permits higher end growth rates which to a degree responds to concerns over growth constraint.
59. However, in respect of B1c, B2 and B8 floorspaces the figures show a deficit ranging from 2.18ha to 2.58 ha if the site allocations in the submitted plan are included in the supply. This supply includes 7,000 square metres of floorspace in use classes B1c, B2 and B8 on site allocation A58, *Land around Burnt Common warehouse, London Road, Send* (see below). In response, **MM42** increases the amount of such floorspace within allocation A58 to a minimum of 14,800 square metres and allows for further industrial floorspace to meet future borough needs as identified through subsequent updates to the ELNA. This is required for soundness to ensure that the Plan meets the assessed need for employment floorspace. Policy A58 is discussed in Issue 11.
60. The Plan provides a good balance of different kinds of employment development both east and west of Guildford. The larger allocated sites make substantial contributions towards meeting employment needs. These include sites A24 *Slyfield Area Regeneration Project* (about 6,500 square metres of light industrial uses); A25 *Gosden Hill Farm* (about 10,000 square metres of employment floorspace); A26 *Blackwell Farm*, (about 30,000 square metres of B1 use on an extension to the Surrey Research Park); A35 *Former Wisley airfield* (about 4,300 square metres of employment floorspace); and A58 *Land around Burnt Common warehouse* (altered by MM42 to a minimum of 14,800 square metres of industrial and storage and distribution).
61. In the case of allocations A24 *Slyfield Area Regeneration Project*, A25 *Gosden Hill Farm* and A35 *Former Wisley airfield*, the amounts of employment floorspace are an integral part of these residential-led mixed use schemes. They are necessary to create balanced, sustainable development. Allocation A26 *Blackwell Farm* contains a much larger business component, an extension to Surrey Research Park, which contains a cluster of largely science and

technology-based activities. The NPPF encourages proactive planning to meet the development needs of business and support an economy fit for the 21st Century; it states that local planning authorities should plan for new and emerging sectors and for the expansion of clusters of knowledge-driven or high technology industries. Building on the success of the existing Research Park by allocating further land close to it for similar uses represents the best opportunity in the Borough to meet these objectives.

62. As regards allocation A58 *Land around Burnt Common warehouse*, the reason behind MM42, which increases the amount of light industrial floorspace within the allocation has been discussed above. With the proposed slip roads in allocation A43a, the site will have excellent access to the strategic road network on a flat, well defined site between B2215 London Road and the A3. Its location and characteristics allow for potential expansion to meet future borough needs as identified through subsequent updates to the ELNA. Exceptional circumstances therefore exist to move the Green Belt boundary to facilitate the development of this site over the plan period, and the approach taken would ensure the establishment of good long-term boundaries to the Green Belt.
63. Policy E2 *Location for new employment floorspace* establishes a sequential approach towards proposals for new office and R&D floorspace, indicating that they will be directed firstly to Guildford town centre, then locations within 500m of a public transport interchange, then Office and R&D Strategic Employment Sites. The problem with this is that whilst the NPPF puts town centres at the top of the hierarchy, the Strategic Employment Sites and Guildford town centre have different kinds of offer, each appealing to businesses of different kinds. Moreover the Plan makes the extended Surrey Research Park and the employment site on the north side of Gosden Hill Farm strategic employment sites, and their development could be less successful if the sequential approach favouring the town centre was applied. It would therefore be ineffective to differentiate between them sequentially or put Strategic Employment Sites third in the hierarchy. To make the policy effective, **MM14** retains a sequential approach but puts Guildford town centre and the Strategic Employment Sites on an equal footing, and places edge of centre sites and sites within 500 metres of a transport interchange on the next level down. Policy E2 is also ineffective in its explanation of how much office expansion would be acceptable elsewhere, since it takes no account of existing operational needs. MM14 contains a more effective approach towards this issue and allows for expansion to meet operational needs. This is necessary to make the policy effective and sound.
64. Subject to the main modifications described above, the locations selected for new employment development are sound.
65. There is evidence that employment floorspace has been lost through the exercise of permitted development rights and other factors. Having regard to the importance of Guildford's leading employment role, the risk to economic health and the need to limit further land take to compensate for such losses, Policy E3 *Maintaining employment capacity and improving employment floorspace* seeks to maintain employment capacity by protecting strategic and locally significant employment sites. It sets out the marketing that would be required before change of use is accepted on such sites, but it contains a

sequential approach towards different employment generating uses which would be both impractical to operate and an impediment to flexibility and the re-use of premises. To ensure that the policy is effective, **MM15** corrects this by stating that marketing should include the consideration of alternative B class uses and other employment generating use; it also sets out more clearly the circumstances where non-employment uses and ancillary uses may be acceptable. MM15 also removes Guildford Town Centre from the list of Strategic Employment Sites; the reasons for this are explained below under the issue of the Spatial Strategy.

66. Policy E4 *Surrey Research Park* protects this site, and the extension allocated in Policy A26 *Blackwell Farm, Hogs Back* for business uses. However, the Research Park attracts a variety of successful commercial occupiers and the policy is too restrictive in requiring uses to be science-based and complementary to the activities of the University of Surrey. **MM16** removes this requirement, instead seeking to resist general office use that does not contribute to the specific function of the Research Park. This is necessary to make the policy effective.
67. Policy E5 *Rural economy* takes a positive approach towards the growth and expansion of all types of business in rural areas. In the interests of effectiveness, **MM17** modifies the policy and background text to make it clear that support is given to the growth of accessible services, and also clarifies the period of marketing required before the loss of rural services may be considered acceptable.
68. Subject to the main modifications described above, the Plan adequately meets the business and employment needs of the Borough. The location of employment provision is dealt with below under the issue of the Spatial Strategy.

Issue 4 – Whether the Plan appropriately meets the retail needs of the Borough

69. The Guildford Retail and Leisure Study Addendum calculates the likely future need for retail and leisure floorspace for the whole borough over the plan period. Short term need for comparison goods floorspace is relatively small but there is a significant increase by 2030 to 40,289 square metres gross and by 2034 to 46,664 square metres gross. For effectiveness, **MM13** adds a table to Policy E1 setting out the net and gross capacity of retail land allocations to meet this need.
70. Policy E7: *Guildford town centre* allocates a retail-led mixed-use development of 41,000 square metres on the North Street regeneration site. The evidence from the Guildford Retail and Leisure Study Addendum indicates that there remains sufficient capacity to support this level of new comparison goods floorspace; assessed gross floorspace capacity for comparison goods in Guildford town centre is indicated at 38,142 square metres by 2030. This figure takes into account projections of future increases in the market share of internet sales, shifts in retail patterns and changing spending habits. Changes to the population and economic variables since the Study was carried out are unlikely to be great enough to have a notable impact on forecast capacity. The

analysis therefore appears robust. Retail needs may change in the future, but the review of the Local Plan would enable the provision of retail floorspace to be considered again at the time of any review.

71. The Guildford town centre is the most popular retail centre in Surrey and a top retail destination outside London. Its health is confirmed by continued growth in footfall (from figures in January 2017 and January 2018), compared with declining footfall in both the South East and the UK as a whole. This position endorses the assessed level of comparison goods need and lends support to the scale of the allocation to the North Street regeneration area. Nevertheless, it is necessary to introduce a degree of flexibility into the policy to ensure that the Plan is capable of adapting to changes in need. It is also necessary to adopt a more favourable approach towards the provision of residential and mixed uses in any town centre schemes; this is discussed in relation to the Spatial Strategy below. **MM31** makes Policy A6 *North Street redevelopment* more flexible by indicating that it will comprise approximately 41,000 square metres or a figure consistent with subsequent updates to the Guildford Retail and Leisure Study, with the balance of allocated uses on the site adjusted accordingly. In conjunction with this, **MM18** removes the floorspace and housing figures from Policy E7 and replaces them with an expression of support for new retail and leisure uses. It also appropriately refers to the sequential approach to town centre uses, and it clarifies Policy E7 to make it clear under what circumstances the loss of shopping centre uses in Guildford town centre's Primary Shopping Area will be permitted. **MM32** introduces Policy A60 *White Lion Walk, High Street, Guildford*, a redevelopment with retail uses on the ground floor and residential above, which is also demonstrative of a more flexible approach towards mixed uses on retail sites.
72. These modifications are required to ensure the effectiveness of the relevant policies and the Plan's overall approach to retailing and mixed use schemes. They also need to be read in conjunction with **MM3** and **MM49** which introduce new Policy S3 *Delivery of development and regeneration within Guildford Town Centre*, discussed below under the Spatial Strategy.
73. The Guildford Retail and Leisure Study also considered the need for convenience goods floorspace, and the mixed-use strategic allocations in the Plan will generate a need for such floorspace. The future capacity identified for these allocations is based on the assumption that 50% of available convenience goods expenditure of people living in new homes on the strategic sites will be spent in existing foodstores in the area. The strategic sites make adequate provision for retail floorspace.
74. Policies E7 *Guildford town centre*, E8 *District Centres* and E9 *Local Centres and isolated retail units* adequately protect against the loss of A1 retail units in a manner proportionate to the type of centre in accordance with the NPPF. **MM47** updates the list of the relevant shopping frontages in the town centre. The protection afforded by the Plan to A1 retail units is justified; centres across the borough perform strongly and have low vacancy rates indicating a strong continuing demand for the retail services they provide. However, the submitted plan lacks clarity as to the status of the new centres that are planned to be built at the strategic sites and hence the policies that will apply to them. **MM22** modifies Policy E9 and explains that the sites at allocation A25

Gosden Hill, A26 Blackwell Farm and A35 former Wisley airfield will be treated as Local Centres.

75. The Plan contains sections within each of the policies to ensure that town centre uses are directed to appropriate centres in accordance with the NPPF. It requires retail impact assessments for retail and leisure proposals over 500 square metres gross. For clarity, **MM20** modifies Policies E8 and E9 to explain that it applies to sites located outside Guildford town centre, District Centres and Local Centres, and **MM21** alters the text to explain the relationship of the retail impact assessment to the sequential approach. The threshold is set at a level related to the size of unit likely to cause an impact, and is justified.
76. Finally, the submitted Plan contains a requirement common to Policy E7 *Guildford town centre*, E8 *District Centres* and E9 *Local Centres and isolated retail units* that resists proposals for new hot food takeaways within 500 metres of schools. However, the evidence indicates that childhood obesity in Guildford is lower than the average for England. Childhood obesity may be a product of a number of factors, not necessarily attributable to takeaway food; takeaways often sell salads as well as nutritious foods; not all kinds of takeaway food are bought by children; children have traditionally resorted to shops selling sweets and fizzy drinks, which would be untouched by the policy; and the policy would have no bearing on the many existing takeaways. In this context there is no evidence that the requirement would be effective in safeguarding or improving childhood health. It would be an inappropriate interference in the market without any supporting evidence and would therefore be unsound. **MM19** appropriately deletes it.
77. Subject to the main modifications set out above, which are required for soundness, the Plan appropriately meets the retail needs of the Borough.

Issue 5 - Whether at the strategic level there are exceptional circumstances which justify altering Green Belt boundaries to meet development needs, and whether the Plan's Green Belt policy is sound

78. The submitted Plan alters Green Belt boundaries to accommodate development around the Guildford urban area, at certain villages and at the former Wisley airfield. It also proposes new Green Belt between Ash Green village and the Ash and Tongham urban area. Exceptional circumstances are required to alter Green Belt boundaries. The issue brings up several important considerations, as follows.

The need for housing

79. This has already been discussed under Issues 1 and 2. Guildford has a pressing housing need, severe and deteriorating housing affordability and a very serious shortfall in the provision of affordable homes. There is additional unmet housing need from Woking. There is no scope to export Guildford's housing need to another district; the neighbouring authorities in the housing market area are significantly constrained in terms of Green Belt and other designations and both have their own significant development needs. The overall level of provision will address serious and deteriorating housing

affordability and will provide more affordable homes. The headroom can also accommodate the likely residual level of unmet need from Woking.

Business needs

80. The NPPF states that the planning system should do everything it can to support sustainable economic growth and should plan proactively to meet the development needs of business. The land available for additional business development in Guildford town centre and the urban area is very limited. It is unrealistic to suppose that much extra capacity can be gained on existing sites, such as the existing Surrey Research Park, which has an environment specifically designed for particular kinds of business and where any rationalisation of space, such as parking, would be carried out for internal operational reasons. The ability to meet the identified business needs therefore depends on making suitable new land available and there is no realistic alternative to releasing land from the Green Belt. Exceptional circumstances therefore arise at the strategic level to alter Green Belt boundaries to accommodate business and employment needs.

Land availability in the urban areas

81. It is not possible to rely on increasing the supply of housing within the urban areas to obviate alterations to the Green Belt boundary. Development opportunities within the urban areas have been thoroughly investigated. All available sites have been assessed for their suitability as part of the Land Availability Assessment process which considered approximately 1,000 sites. In accordance with the NPPF, the Plan relies only on sites that are either deliverable or developable, which means that about 30 sites have been discounted within Guildford town centre and 90 within the urban area. In Guildford town centre there are constraints that influence its capacity to accommodate more homes, including conservation and flood risk issues. The issue of flood risk is dealt with later.
82. Although further sites have been identified in other documents such as the Town Centre Masterplan, and in work undertaken by the Guildford Vision Group, they cannot be relied upon to deliver homes or meet business needs within the plan period and it would therefore be unsound to assume that they can contribute towards meeting the Plan's housing requirement. Woodbridge Meadows contains existing businesses and is not deliverable for housing during the plan period. Any space at the University is likely to be retained for its own needs. Some town centre sites may have greater capacity than that anticipated by the Plan; the additional potential at Guildford Station has already been recognised, and there may be opportunities for more housing at Walnut Tree Close and the North Street redevelopment. But any extra yield from these sites would fall a long way short of making the scale of contribution towards meeting overall development needs that would enable the allocated sites in the Green Belt to be taken out of the Plan.

Whether the difference between potential supply of 14,602 dwellings and the latest MM2 housing requirement of 10,678 implies that the plan should allocate fewer sites and release less Green Belt land

83. The first point here is that the plan must be considered as a whole; it contains an integrated set of proposals that work together. As is discussed below in

Issue 6, the strategic allocations operate to deliver a range of benefits which cannot be achieved by smaller dispersed sites. *A25 Gosden Hill* provides a park and ride facility and part of the sustainable movement corridor and contributes towards a new railway station; *A26 Blackwell Farm* provides land to enable the expansion of an important research park, together with part of the sustainable movement corridor and it contributes towards a new railway station. They work together to provide housing, employment and sustainable movement across Guildford. Site *A35 Former Wisley airfield* provides the A3 slip roads and bus services and cycle network that benefit the allocations at Send, Send Marsh/Burnt Common and Ripley and feed into local stations; in turn, Burnt Common provides an employment facility for the Borough. The large sites also make an important contribution towards meeting the needs of gypsies, travellers and travelling showpeople. The sites all work in concert to deliver a sound, integrated approach to the proper planning of the area.

84. Secondly, the plan needs to be robust and capable of meeting unexpected contingencies such as delivery failure or slippage on one or more sites. It needs to be borne in mind that the housing requirement is a minimum figure, not a target. A robust strategy is particularly relevant for Guildford where longer term housing delivery is largely by means of large strategic housing sites. There is also uncertainty about the timing of the A3 RIS scheme, as discussed in Issue 8; the headroom provides some flexibility over timing and ensures that if a degree of slippage does occur, the Plan is not vulnerable. The amount of headroom between potential housing provision and the housing requirement means it is not necessary to create safeguarded land which would have to be removed from the Green Belt to meet longer term development needs, or to identify reserve sites to be brought forward should sites fail to deliver as expected. In any case, if it had been necessary to identify reserve sites, they would almost certainly have had to be on land removed from the Green Belt.
85. Thirdly, the Plan needs to be effective over its life and have regard to potential changes in circumstances. To that end it contains a balance of short- and long-term sites. This can be seen on the housing trajectory in Appendix 1 as modified by MM46. The permitted and commenced sites and smaller allocations deliver the 5 year supply. These include for example the allocations at West Horsley, Send, Send Marsh/Burnt Common and Ripley and on land at the inset villages. Land needs to be released from the Green Belt to allow these sites to be developed, in order to meet housing needs in the first 5 years of the Plan. When delivery from these sites starts to diminish, that from the strategic sites builds up. But large strategic sites have long lead-in times and development periods – their timespan may cover a number of plan reviews and housing requirement re-calculations. Circumstances may change, and new strategic sites cannot be brought forward quickly to meet revised housing requirements; they have to be planned well in advance. Therefore, by making the allocations now, the Council have aimed to future proof the Plan. This is in accordance with the NPPF which says that plans should have sufficient flexibility to adapt to rapid change. The Plan clearly demonstrates a flexible, integrated and forward-looking approach towards meeting present and future needs in the Borough and towards encouraging more sustainable modes of travel. Removing one or more sites would significantly diminish the Plan's ability to meet these objectives.

Whether the quantity of development should be restricted having regard to Footnote 9 of the NPPF

86. Subject to the proposed Green Belt alterations, the Plan is capable of meeting objectively assessed needs with adequate flexibility. The alterations to the Green Belt boundary would have relatively limited impacts on openness as discussed in Issues 10 and 11, and would not cause severe or widespread harm to the purposes of the Green Belt. The allocations at A25 *Gosden Hill Farm* and A26 *Blackwell Farm* would be planned urban extensions rather than sprawl. Site A25 together with the allocations at Send and Burnt Common/Send Marsh would be visually and physically separate, as discussed in Issue 7 and would not add to sprawl or coalescence. A35 *Former Wisley airfield* would include a substantial amount of previously developed land and is separate in character from its wider Green Belt surroundings. The other Green Belt sites would be adjacent to settlements and would have very localised effects on openness. There is therefore no justification for applying a restriction on the quantity of development. Considerations in respect of the Surrey Hills Area of Outstanding Natural Beauty (AONB) and the Thames Basin Heaths Special Protection Area (SPA) do not alter this conclusion: see issue 7.

The effectiveness of the Plan's Green Belt policy

87. Policy P2 *Green Belt* sets out the criteria for considering whether development is appropriate in the Green Belt. It states that proposals in the Green Belt will be permitted where they are consistent with the exceptions listed in national planning policy. However, it then goes on to single out only two of the categories, extensions or alterations and replacement buildings. It also contains a lack of clarity over extensions to original buildings; and a requirement that replacement dwellings should be sited on or close to the existing building, which is not in the NPPF and may prevent a more appropriate siting. **MM9** modifies the policy by bringing it into line with the NPPF; it establishes what is meant by the original building, replacement dwellings and limited infilling. It also makes the monitoring indicator more effective by encompassing all decisions relating to inappropriate development.

Extending the Green Belt

88. The submitted plan seeks to alter the Green Belt boundary to include an additional area of Green Belt land between Ash Green village and the Ash and Tongham urban area with the aim of preventing coalescence. This is not justified by exceptional circumstances since separation can be maintained through ordinary non-Green Belt policies. **MM10** removes the additional area of Green Belt from the Policies Map and instead strengthens Policy P3 *Countryside* to ensure that development does not lead to greater coalescence between these settlements.

Conclusion

89. In conclusion, all the above points amount to strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term planning of the Borough. Local level exceptional circumstances are considered in Issues 10 and 11.

90. There are no exceptional circumstances justifying the creation of new Green Belt between Ash Village and the Ash and Tongham urban area. Policy P2 *Green Belt* is sound subject to MM9.

Issue 6 – Whether the overall spatial development strategy is sound

Overall spatial distribution

91. The Plan aims to concentrate growth in Guildford Town Centre, urban areas, inset villages and identified Green Belt villages. About 3,000 homes are to be located in the urban areas and about 1,600 on non-strategic sites within and at extensions to villages. However, these areas cannot accommodate all the Borough's development needs, so land is to be identified for development around Ash and Tongham, which are beyond the Green Belt; urban extensions to Guildford, a new settlement at Wisley, and development around villages.
92. The plan achieves a satisfactory balance by allocating a spread of strategic and non-strategic sites to provide choice and a variety of housing and employment opportunities across the Borough. The borough is constrained to the north by the Thames Basin Heaths Special Protection Area (SPA) and to the south by the Surrey Hills Area of Outstanding Natural Beauty (AONB), so as a result development is focused across the middle of the borough broadly (but not entirely) on the A3 / A31 axis. There is an adequate balance between sites to the east – such as Wisley airfield, Gosden Hill Farm and the village sites at Send and East Horsley and West Horsley – and the west, with sites such as at Blackwell Farm and Ash and Tongham.
93. Five strategic sites are identified at North Street in Guildford Town Centre, the Slyfield Area Regeneration Project on the fringe of Guildford, Gosden Hill Farm and Blackwell Farm, which are extensions to Guildford, and the former Wisley airfield, a freestanding site close to the junction of the A3 and M25. Together with the strategic allocation at Ash and Tongham, outside the Green Belt, these allocations deliver a significant proportion of housing and employment land to meet development needs.
94. Two of the sites are in the Guildford urban area. North Street is a redevelopment within the central area. The Slyfield site is an urban fringe regeneration scheme well located for Guildford and has the ability to provide both housing and employment not far from the town centre. Both sites will accommodate a significant amount of development in sustainable locations. Gosden Hill Farm and the former Wisley airfield are residential-led mixed use allocations which will support a range of housing types, and employment, social and community facilities and will help towards the delivery of improved highway and sustainable transport links. Blackwell Farm, as well as delivering a large number of homes, also provides a large B1 employment allocation next to the successful Surrey Research Park.
95. The spatial strategy in the Plan has three considerable advantages. Firstly, it allocates the largest amounts of development to the most sustainable locations, or those which can be made sustainable; secondly, it achieves a satisfactory spatial balance in a variety of locations and types of site; and thirdly, the strategic sites will accommodate a significant amount of the

Borough's housing and employment needs whilst at the same time meeting their own social needs and contributing towards transport improvements that have wider benefits. The advantages of the last of these points is recognised by the Sustainability Appraisal and it justifies the inclusion of the larger sites including Gosden Hill Farm, Blackwell Farm and the former Wisley airfield.

96. Allocating more sites at the villages might allow for some earlier housing delivery but would risk eroding their character and would not enable the full range of social facilities and sustainable transport benefits that the large strategic sites can bring. Allocating additional land in the Ash and Tongham area would alter the spatial balance of the plan and risk creating a sprawl of development just beyond the Green Belt; it would also potentially exacerbate highway capacity problems. Neither of these approaches is as effective as the chosen spatial strategy.
97. The inclusion of these strategic sites makes for an effective plan that meets the sustainable development needs of the Borough. Their size facilitates the delivery of social, transport and other facilities that would be more difficult to achieve by spreading the same amount of development around on smaller sites. They serve housing, employment and social needs in different parts of the Borough, yet are well positioned in relation to Guildford. They are in locations where they do not significantly affect areas important for landscape and biodiversity. Transport issues are dealt with below under Issue 8. More detailed local impacts and policy details relating to the larger sites are considered under Issues 10 and 11.

Guildford town centre

98. One of the purposes of the Green Belt is to assist in urban regeneration and the policies in the submitted plan are not effective enough in encouraging residential development in the town centre or in creating the kind of attractive street level environment that would encourage people to live there.
99. Policy E7 *Guildford Town Centre* only deals with retail development; Policy E1 *Meeting employment needs* and Policy E3 *Maintaining employment capacity and improving employment floorspace* identify part of Guildford town centre as a strategic employment site and protect it from uses other than B1a Offices and B1b Research and Development. These policies work together to prevent mixed use schemes that could include an element of residential development. Their effect is clearly evident on the ground where much of the town centre contains single uses such as retailing or office buildings, the latter surrounded by engineered highways with a poor quality street environment.
100. **MM3** introduces a new policy into the plan: Policy S3: Delivery of development and regeneration within Guildford Town Centre. This seeks more efficient use of land, encourages mixed use schemes and the acceleration of housing delivery, and contains requirements to encourage good urban design. It is introduced in tandem with the deletion of the town centre as a strategic employment site in **MM15**, thus allowing other uses into a substantial part of the town centre, and in tandem with the changes described in Issue 4 above which introduce more flexibility into Policy A6: *North Street redevelopment*. These modifications together enable a more flexible approach to be taken towards the balance of uses in town centre redevelopment, creating the

conditions for additional residential development, and they are required for the effectiveness of the plan. This will improve the town centre's potential to contribute towards housing windfalls over the plan period, but as previously pointed out, it will not deliver enough new housing to make any of the Plan's allocations unnecessary.

Inset villages and sites

101. In previous plans, all the villages except for Ash Green were washed over by the Green Belt, but the NPPF states that only those villages whose open character makes an important contribution to the openness of the Green Belt should be included within it. The submitted Plan therefore insets 14 villages from the Green Belt based on the comprehensive and well-founded work of the Green Belt and Countryside Study. The villages concerned do not have an open character that contributes to the openness of the Green Belt, and the Plan establishes the new Green Belt boundary around them. This would allow for infill development which would help to meet some local need on a small scale, but there is no reason to suppose that this would adversely affect their character, since the Plan's design, heritage and landscape and other policies would still exercise adequate control over development within them. Having regard to the NPPF, there are exceptional circumstances to inset these villages from the Green Belt.
102. As well as insetting, the Plan allocates sites for growth at some villages, such as at West Horsley, East Horsley, Send, Send Marsh / Burnt Common and Ripley. The allocations are proportionate extensions to medium-sized villages with access to village and transport facilities and the scale of additional growth proposed would not harm their character. There is Horsley station; Send is served by existing bus services and there is an opportunity to link the development at Garlick's Arch to a new bus service provided in relation to the Wisley airfield development. The allocated sites would provide for both local and Borough-wide needs and the Burnt Common allocation addresses business needs in a location easily accessed from the strategic road network, in combination with new A3 slip roads. They make an important contribution towards the delivery of sites in the early years of the Plan as discussed in Issue 5 in relation to the Green Belt. The insetting of the villages and the provision of additional land for development is an appropriate response to the NPPF and the alteration to the Green Belt boundaries is justified by exceptional circumstances.
103. A similar, equally sound approach is adopted towards, firstly, the insetting of major previously developed sites in the Green Belt where they are of sufficient scale and do not possess an open character and secondly, the insetting of certain sites for gypsies and travellers. In these cases, insetting the sites would not have a significant effect on the openness of the Green Belt and their insetting is justified as an exceptional circumstance in order to meet identified needs.

Infrastructure delivery

104. Appendix C, *Infrastructure Schedule* contains a comprehensive list of infrastructure requirements on which the delivery of the plan depends, produced in conjunction with infrastructure delivery organisations. It focuses

principally on the first 5 years of the plan and the infrastructure required to deliver the strategic sites. It is relevant and up to date; **MM48** adds a new scheme to the schedule, A247 Clandon Road/The Street (West Clandon) traffic management and environmental improvement scheme as a mitigation measure in respect of site allocations at Send, Send Marsh and Burnt Common; this is discussed in Issue 11. Site-related infrastructure requirements are set out in the Plan's site allocation policies.

105. Policy ID1 *Infrastructure and delivery* is a general policy aimed at ensuring that the infrastructure necessary to support new development will be provided and made available to serve the development's occupants and to mitigate its adverse impacts. The Infrastructure Schedule is set out in Appendix C of the plan. The policy does not allow for the possibility of a Grampian condition to secure infrastructure and contains a set of statements of intent for the Council that are not policy-related and should be in the background text. In addition, the background text sets out factors that the Council will take into account in situations where infrastructure requirements make the development unviable, and this should be set out in the body of the policy. **MM26** rectifies these shortcomings and subject to this modification the policy is effective.

Conclusion

106. The overall spatial development strategy is sound in every respect, subject to the main modifications, including its approach towards the overall spatial distribution, the location of the strategic allocations, the approach to Guildford town centre, the inset villages, and infrastructure delivery.

Issue 7 – Whether the Plan's approach towards the protection of landscape and countryside, biodiversity, flood risk and groundwater protection is sound

Landscape and countryside

107. The Plan does not allocate any housing or employment on undeveloped areas in the Surrey Hills AONB. Sites A32 *Surrey Police Headquarters, Mount Browne* and A33 *The University of Law, Guildford* are in the AONB but are previously developed sites. Site A26 *Blackwell Farm* has an access which passes through a small part of the AONB, as discussed above, and a corner of the site is in the Area of Great Landscape Value (AGLV) but the allocation would not have a significant impact on either of these areas. Policy P1 aims to conserve the AONB and contains a presumption against major development within it except in exceptional circumstances where it can be demonstrated to be in the public interest. **MM8** modifies the monitoring indicator, which was ineffective as it only related to appeals, to include all planning decisions allowing major development in the AONB on non-allocated sites. Subject to **MM8**, the plan's approach to the AONB is sound.
108. Policy P3 protects the countryside as designated on the Policies Map by allowing development appropriate to a rural location and by ensuring that development is proportionate to the nature and scale of the site, its setting and countryside location. **MM10** has already been discussed in relation to the

Spatial Strategy; it also modifies the monitoring indicator in a similar manner to MM8 to apply to all decisions to make it effective.

109. The impact of the site allocations on the wider landscape would be relatively limited. A substantial amount of development is allocated to the east of Guildford, but the sites at the former Wisley airfield, Gosden Hill Farm and Send Marsh / Burnt Common would be physically and visually separated by the A3, together with the intervening landform, woodlands and hedgerows. Landscaping within and on the boundaries of the sites would further limit their visual impact, thus avoiding an eastward sprawl of development. Wisley airfield is on a plateau and is not a prominent site. The Blackwell Farm site would be glimpsed through the vegetation from the Hog's Back and would be seen from public rights of way, but wider views would be restricted by trees and hedgerows. Other allocations are well related to the adjoining urban areas and villages.
110. The Plan's spatial strategy successfully accommodates substantial development to meet Guildford's needs whilst avoiding significant landscape harm; the circumstances do not justify accepting a lower level of development. Policies P1 and P3 proved strong protection for the AONB and AGLV and for the countryside.

Biodiversity

111. There are two European sites which fall partially within Guildford Borough: the Thames Basin Heaths Special Protection Area (SPA) and Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC), which overlaps with the SPA. Thames Basin Heaths consists of a number of fragments of dry and wet heath but also includes area of deciduous woodland, gorse scrub, acid grassland and mire, as well as associated conifer plantations. Around 75% of the SPA has open public access being either common land or designated as open country. The SPA supports populations of European importance of nightjar, woodlark and Dartford warbler during the breeding season. These species nest on or near the ground and as a result are susceptible to predation and disturbance.
112. The Guildford Local Plan Habitats Regulation Assessment (HRA) was issued in November 2017. It identified any aspects of the emerging Local Plan documents that would have the potential to cause a likely significant effect on the SPA /SAC, either in isolation or in combination with other plans and projects, and considered appropriate mitigation strategies where such effects were identified. The 2017 Habitats Regulation Assessment (HRA) (as clarified by the HRA Update of June 2018) was split into two separate pieces of analysis. The first, in chapters 4 and 5, looked at the likely significant effects of the Plan on the SPA / SAC and the remainder of the HRA constituted the Appropriate Assessment. All the residential site allocations were screened in and were subject to Appropriate Assessment; only non-residential allocations were screened out. Mitigation, such as the Thames Basin Heaths Avoidance Strategy, was not considered until the Appropriate Assessment stage. Pathways of impact taken into account included urbanisation, recreational pressure and atmospheric pollution. The approach taken was in accordance with the subsequent Court of Justice of the European Union (CJEU) judgment in "People over Wind" (otherwise known as "Sweetman").

113. The air quality modelling shows that NO_x concentrations and nitrogen deposition rates within 200m of the Thames Basin Heaths SPA are expected to be better at the end of the plan period than they are at the moment, due to expected improvements in vehicle emissions and Government initiatives to improve background air quality. The Design Manual for Roads and Bridges guidance for air quality assessment recommends reducing nitrogen deposition rates by 2% each year between the base year and assessment year. The HRA Addendum (January 2019) reports that, using data for the 5km grid square (for nitrogen deposition) and 1km grid square (for NO_x) within which the Ockham and Wisley Commons part of the Thames Basin Heaths SPA is situated, average concentrations fell by an annual average rate of improvement equivalent to 4% of the starting concentration for NO_x and 3% for oxidised nitrogen deposition over around 10 years to 2014 (the latest year for which data are currently available). This reduction occurred despite increased housing and employment development and traffic growth, and is most likely to be attributable to improvements in emissions technology in the vehicle fleet. Consequently, allowing only a 2% per year improvement in nitrogen deposition rates represents a precautionary approach. The approach taken towards improvements in baseline NO_x concentrations and nitrogen deposition rates is in line with Design Manual for Roads and Bridges guidance for air quality assessment and does not conflict with the 'Dutch Nitrogen' CJEU ruling.
114. The HRA Addendum of January 2019 considered the implications of the CJEU ruling in the Holohan case. The ability of the SPA to support its populations of nightjar, woodlark and Dartford warbler is closely linked (in terms of both nesting and foraging habitat) to the presence of heathland and traditionally managed plantation both within and outside the SPA boundary. The HRA considered relevant impacts on these habitats, including air quality impacts, despite that fact that neither habitat is a reason for the designation of the Thames Basin Heaths SPA. None of the proposed development sites in the Local Plan will result in the loss of significant areas of heathland or managed plantation outside the SPA boundary and no adverse effect on integrity is expected. The CJEU Holohan ruling therefore requires no change to the HRA.
115. Policy P5 protects the Thames Basin Heaths Special Protection Area, resisting a net increase in residential units within 400m of the SPA boundary and seeking avoidance and mitigation in respect of residential development between 400m and 5km from the boundary, and on a case-by-case basis up to 7km for developments of over 50 dwellings. Mitigation measures include a combination of Suitable Alternative Natural Greenspace (SANG) and Strategic Access Management and Monitoring (SAMM). Sites A25 (Land at Gosden Hill Farm Merrow Lane, Guildford), A26 (Blackwell Farm Hogs Back, Guildford), A35 (Land at former Wisley airfield, Ockham) and A38 (Land to the West of Horsley) all contain a policy requirement to provide a bespoke SANG in addition to making SAMM contributions. In accordance with the adopted Avoidance Strategy, these developments will not be permitted without a bespoke SANG agreed with Guildford Council and following consultation with Natural England, and this will provide a protective safeguard to ensure that no adverse effect on integrity will result, either alone or in combination with other plans or projects. Other site allocations that fall within the criteria are also required to provide or contribute towards SANG.

116. The HRA identified four site allocations for further consideration in relation to the effects of urbanisation. The first of these is Policy A22: *Land north of Keens Lane*, 140 dwellings would be located outside the 400m zone but a care home would be located within it. The site allocation policy contains requirements that follow Natural England recommendation including the location of parking and the restriction of the use class of the care home to C2. The second site is Policy A23: *Land north of Salt Box Road*. This site is adjacent to the SPA and is allocated as a burial ground; the policy requires appropriate measures to discourage access from the burial ground and car park into the SPA. The third site is the strategic allocation Policy A35: *Land at former Wisley Airfield*. The Site Allocation requires SANG and the masterplan for the site submitted as part of a recent planning application identified that the area of land within 400m of the SPA would provide SANG, with no other type of development occurring within 400m of the SPA. This policy also includes the requirement for an application level HRA. The application was refused on other grounds, not on the impact on the SPA. The applicant for this site would have to ensure that these impact pathways could be screened out or adequately mitigated to conclude no adverse effect on integrity. As regards Policy A51: *Land at Cobbets Close, Worplesdon*, just outside the 400m zone, the policy includes the requirement for an application level HRA and the applicant for this site would have to ensure that these impact pathways could be screened out or adequately mitigated to conclude no adverse effect on integrity. Subject to the measures included in the policies, no adverse effect on the integrity of the SPA would arise.
117. **MM12** alters the supporting text to Policy P5 to delete a statement that residential development contributing to appropriate mitigation measures would not have to undergo Appropriate Assessment, to bring the plan into line with the CJEU judgment in "People over Wind". It also corrects text in Policy P5 to express more accurately the position of Natural England as a consultee in relation to planning decisions, rather than a decision maker. These changes are necessary to ensure that the approach taken by the Plan is lawful and effective.
118. Policy ID4 *Green and blue infrastructure* seeks to maintain, conserve and enhance biodiversity and encourage habitat restoration and creation and sets out a hierarchy of designated areas. The submitted policy and supporting text contain some imprecise wording, and **MM29** clarifies that new development should aim to deliver gains in biodiversity where appropriate (since self-evidently not all forms of development can do so); sets out the aspects of watercourses that will be protected and enhanced; and stresses the necessity of avoiding downstream adverse impacts on water quality objectives. The modification is required to ensure the policy is effective.
119. Subject to the main modifications described, the Plan takes a sound approach towards biodiversity and protected habitats and is based on an adequate and lawful Habitats Regulation Assessment and Appropriate Assessment. There is no justification for applying a restriction to the overall amount of development having regard to the presence of protected sites.

Flood risk and groundwater protection

120. The Guildford Borough Strategic Flood Risk Assessment Level 1 (2016) highlights the areas of the Borough at risk from various types of flooding and has been used to guide development towards areas with the lowest risk of flooding. A flood risk sequential test and Level 2 Strategic Flood Risk Assessment were also prepared. The application of the sequential test demonstrates that land outside the area of flood risk is not capable of accommodating all the Borough's development needs. Some new development will therefore necessarily be located in areas at medium or high risk of flooding where it passes the flood risk sequential and exception tests.
121. The Assessment notes that some of Guildford's functional floodplain (flood zone 3b) has historically been built upon and it therefore differentiates between the 'developed functional floodplain' and the 'undeveloped functional floodplain'. This is particularly the case in Guildford town centre where the River Wey has given rise to localised flood events. Whilst the NPPF states that the functional floodplain should be reserved for water storage and flow in times of flood, the Strategic Flood Risk Assessment indicates that development or redevelopment in the 'developed functional floodplain' may be acceptable when flood risk betterment, appropriate mitigation and risk management can be achieved and implemented. This does highlight one of the difficulties that arise in attempting to increase the amount of residential development in the town centre, as discussed earlier in this issue.
122. Allocation A2 *Guildford Cinema* and allocation A9 *Land to the rear of 77 to 83 and between 99 to 103 Walnut Tree Close* are located in flood zone 3b developed functional floodplain and are on previously developed sites in sustainable locations in or close to Guildford town centre. They are allocated for main town centre uses rather than residential and contain policies requiring flood betterment on site. The same applies to allocation A6 North Street redevelopment, a small part of which also falls within flood zone 3. Allocations A13 *Kernal Court* and A14 *Wey Corner* in Walnut Tree Close contain requirements to help reduce flood risk in the local area.
123. Policy P4 sets out the circumstances in which development in areas of flooding may be permitted, and sets out the criteria that will be applied, including the need to pass the sequential and exception tests where required. The policy is not clear enough as to which areas are covered by the policy and **MM11** clarifies that this part of the policy applies to areas of medium or high risk and requires there to be no increase in development vulnerability and adjusts the monitoring indicators accordingly. The policy also ensures that developments do not lead to an increase in surface water run-off and gives priority to the provision of sustainable drainage systems, and it only allows for development in Groundwater Source Protection Zones and Principal Aquifers where it has no adverse impact on the quality of the groundwater resource. Subject to MM11, the policy is sound and the plan takes an appropriate approach towards flood risk and groundwater protection.

Conclusion

124. Subject to the MM, the Plan takes a sound approach towards the protection of landscape and countryside, biodiversity, flood risk and groundwater protection.

Issue 8 – Whether the Plan deals adequately with the transport impacts of its development strategy

Overall

125. The Plan incorporates the programme of transport schemes contained in the Guildford Borough Transport Strategy 2017. This covers all modes of surface transport. The Plan's spatial strategy has been assessed in Surrey County Council's Strategic Highway Assessment Report (2016) and the Council's Addendum (2017). The conclusion of these studies was that the amount and distribution of development proposed in the Proposed Submission Local Plan together with the key highway schemes would not have a severe impact on the local and strategic highway network.

126. However, this is dependent on a variety of measures and these are discussed below.

Improvements to the A3 and junctions

127. The Council has prepared the Submission Local Plan on the assumption that the A3 Guildford Road Investment Strategy (RIS) scheme will be delivered. This part of the A3 suffers from peak period congestion and experiences a higher than average number of incidents. An improvement of the A3 through Guildford was included in the first Road Investment Strategy (RIS1) announced in 2015 as a scheme to be developed during Road Period 1 (2015/16 to 2019/20). Potential options for a scheme between the A31 and A320 are being considered by Highways England as part of a wider study to identify an appropriate scheme to facilitate economic growth. Work has been undertaken on the feasibility of these options and the investigations have had a positive outcome.

128. However, there is still uncertainty over the timing of the project and the earliest date it can start is 2024 with completion in 2027. The strategic sites and other allocations are not necessarily individually dependent on the improvement scheme but together they would have a cumulative impact. In the Statement of Common Ground between the Council and Highways England, it is agreed that, based on the assessed trajectory of Local Plan growth up until 2024, the impact to the A3 will unlikely to be of a scale to prevent progress of the Local Plan at this stage. But planned development in the later stages of the plan period may be affected by the delivery of the A3 improvement scheme and this has implications for delivery rates at the Gosden Hill Farm, Blackwell Farm and Slyfield Area Regeneration Project sites.

129. The inclusion of the improvement scheme in RIS1, the Statement of Common Ground with Highways England, and the discussions the Council have had with them, point towards the likelihood that the RIS will be delivered within the

plan period, and thus lend support to the spatial strategy, and to the inclusion of the above sites. The spatial strategy is soundly based and it would not be appropriate to pursue a different spatial strategy on the basis of uncertainties over the timing of the A3 works. In any case many potential alternative sites would themselves have an impact on the A3.

130. However, it is important that the Plan remains robust, so **MM27** incorporates a trigger into Policy ID2 *Supporting the Department for Transport's Road Investment Strategy* to review the transport evidence base in the event of a material delay or reduction in scope of the RIS scheme; the outcome of this review will determine whether development can continue to be completed in accordance with the Plan trajectory or whether there will need to be a review of the Plan. In that regard, all the strategic sites have individual proposals for the mitigation of highways impacts, which could be accelerated or enhanced if the A3 scheme is delayed, reduced in scope or cancelled.
131. Other schemes relevant to the A3 include the M25 Junction 10/A3 Wisley interchange RIS scheme and the M25 Junctions 10-16 RIS scheme which both have 2020/21 start dates. There are also two targeted improvements to the A3 to address congestion and safety issues: the A3 northbound off-slip lane widening at University Interchange (approaching Tesco roundabout) and the southbound off-slip lane widening to A320 Stoke Interchange improvement scheme. These are due to be delivered earlier than the A3 Guildford RIS improvement scheme.
132. In addition to the A3 Guildford RIS scheme discussed above, it is proposed that two improved junctions with the A3 trunk road will be delivered by developers to provide appropriate vehicular access for the strategic sites. Firstly, a new A3/A3100 Burpham junction is proposed, with a relocated A3 southbound offslip and a new A3 southbound on-slip, principally to serve the Gosden Hill Farm site (Policy A25). As well as serving the new development, the scheme will also allow existing residents and businesses in Burpham and Merrow to access the southbound A3 without having to drive through Guildford to access the A3 at the A322 interchange junction. Secondly, a A3 northbound on-slip and A3 southbound off-slip at A247 Clandon Road (Burnt Common) is proposed, principally to deal with the potential traffic impacts of Wisley airfield (Policy A35). This would help to relieve Ripley of some through traffic as well as serving development at Send, Send Marsh and Burnt Common.
133. These schemes are included as infrastructure requirements within Policies A25 and A35 respectively, and in the case of the Burnt Common slip roads, the land is allocated by Policy A43a. They have been developed in conjunction with Surrey County Council and through consultation with Highways England and are being brought forward by agreement with the developers of the strategic sites. At the time of the hearings Highways England were reviewing the developers' material on the Burnt Common slip roads, but indicated that they would have been content for the slip roads to be secured by a Grampian planning condition on any planning permission. This indicates enough support for the scheme to enable it to be incorporated into the plan. The evidence indicates that these schemes are viable and deliverable. Their inclusion in the plan is sound.

Local roads

134. Six schemes for traffic management and/ or environmental improvements have been included in the Infrastructure Schedule in the Plan, at Ash, Ash Vale, Tongham, Send and East Horsley and West Horsley. **MM48** adds a further scheme on the A247 at West Clandon. They have been included to avoid potential adverse impacts on communities and the environment arising from the development, including impacts on amenity and health, noise pollution and air pollution. Various possible measures are listed in the Topic Paper: Transport including footway enhancements and improved bus stops on Ash Road and Guildford Road; traffic calming of various kinds on Ash Hill Road and Ash Vale Road; footway improvements, parking formalisation and shuttle working in The Street, Tongham; footway enhancements, raised junctions and traffic signalled junctions on A247 Send Road / Send Barns Lane; and traffic calming measures, speed limit changes, raised junctions, central island refuge and other measures at East Horsley and West Horsley.
135. These measures are intended to be developer-funded. They are not set out as requirements in the allocation policies, but Policy ID3 *Sustainable transport for new developments* indicates that new development will be required to provide and/or fund the provision of suitable transport infrastructure necessary to make the development acceptable, including the mitigation of adverse impacts. This will apply not just to the six schemes mentioned in the Infrastructure Schedule but to any development likely to have significant adverse impacts, and the policy also refers to cumulative impacts. This will enable the Council to seek appropriate measures to mitigate the impact of traffic from new development on other local roads.
136. Moreover, the question of local highways impact should be seen in the context of all the other policies and proposals in the Plan which seek to manage movement. These include the A3 junction proposals mentioned above, which would achieve a redistribution of movement on the highway network. They also include Park and Ride, the provision of new railway stations and bus services and the rollout of the Sustainable Movement Corridor, discussed below. All these measures would achieve a shift in transport mode and would help to alleviate pressure on the road network.

Other transport proposals

137. Rail schemes include the Guildford rail station capacity and interchange improvements, the electrification of the North Downs Line (facilitating increased service frequency) and Portsmouth Direct Line improvements together with South West Main Line Peak Demand improvements. In addition, Network Rail considers that, subject to further assessment and approval, the delivery of a new station at Guildford East (Merrow) is feasible and viable. South Western Railway has publicly committed to work with stakeholders to progress the plans for new stations at Guildford West (Park Barn) and Guildford East (Merrow). Both of these proposals are developer-funded and contributions towards them are included as requirements in Policy A26 *Blackwell Farm* and A25 *Gosden Hill Farm*.
138. Policies A26 *Blackwell Farm* and A25 *Gosden Hill Farm* together with Policy A24 *Slyfield Area Regeneration Project*, Policy A5: *Jewsons, Walnut Tree Close*,

Policy A7 *Guildford railway station*, Policy A10 *Land for Sustainable Movement Corridor Town Centre Phase 2, off Walnut Tree Close*, Policy A11 *Guildford Park Car Park*, Policy A16 *Land between Gill Avenue and Rosalind Franklin Close*, and Policy A17 *Land south of Royal Surrey County Hospital* all contain various measures to bring about the provision of sections of the Sustainable Movement Corridor. This would be a multi-modal route which would, depending on the location, provide separate lanes for bus, cycle and pedestrians, and the use of bus priority measures at congested sections of the highway and at interchanges. Feasibility work has been undertaken and design work has also been carried out and is still in progress. Funding has already been secured for the western section. The scheme would be rolled out over the life of the plan. It would link areas that generate significant amounts of movement, including several of the allocated sites, a new park and ride site (see below), the new rail stations referred to above, Guildford railway station and town centre, and the University of Surrey. The policies are sound in requiring the specified land and contributions to be provided for the Sustainable Movement Corridor.

139. A new park and ride site is proposed at Gosden Hill Farm (Policy A25) which would alleviate pressure on the highway at the eastern approaches to Guildford. In addition, Policies A25 *Gosden Hill Farm*, A26 *Blackwell Farm* and A35 *Former Wisley airfield* all contain requirements to provide a significant bus network.

Sustainable transport

140. Policy ID3 requires new development to contribute to the delivery of an integrated, accessible and safe transport system, maximising the use of sustainable transport modes, and establishes a set of steps for development to take into account in order to achieve this objective. These will assist in promoting sustainable transport modes and, along with all the other initiatives referred to above, will help to mitigate the effect of the Plan's development proposals.

141. However, the policy seeks planning obligations to ensure that future residents will not be eligible for residents' parking permits, and two court judgments (*Westminster City Council v SSCLG* [2013] and *R (Khodari) v Kensington and Chelsea RBC* [2017]) have shown this to be unlawful. **MM28** removes this requirement and indicates that a parking supplementary planning document will be brought forward which may set maximum parking standards in Guildford town centre, whilst the explanatory text adds that the Council, working with Surrey County Council, will consider amending the town centre Traffic Regulation Order in order to address permit eligibility issues. For the same reason, **MM30** also removes a similar requirement from Policy A3 *Land between Farnham Road and the Mount, Guildford*. These modifications are required to ensure that the requirements are lawful.

Conclusion

142. The Plan deals adequately with the transport impacts of the development strategy, and takes a positive approach towards encouraging people to shift transport mode away from private vehicles. Subject to the main modifications described above, the transport strategy is sound.

Issue 9 – Whether the Plan contains effective policies for promoting sustainable development, shaping successful places, achieving sustainable design and construction, protecting heritage assets and promoting good urban design

143. These matters are dealt with by Policies S1 and D1 to D4.

144. Policy S1 *Presumption in favour of sustainable development* is a general policy expressing a presumption in favour of sustainable development, taking reference where appropriate from the NPPF. **MM1** clarifies the policy in respect of natural and heritage assets and is necessary for soundness.

145. Policy D1 *Place Shaping* and Policy D4 *Character and design of new development* overlap in their coverage. Moreover, they do not adequately reflect the full range of design issues covered in the Planning Practice Guidance and do not adequately reflect Government policy. The plan contains large strategic sites and it is important that they are designed in accordance with good urban design principles. The submitted policies do not achieve this and are therefore unsound.

146. **MM23** contains a comprehensive new policy D1 *Place shaping* which combines the subject matter of both submitted policies and deletes Policy D4. The new policy goes into more detail about key aspects of urban design including the creation of distinct local character, safe, connected and efficient streets, a network of green spaces and public places, crime prevention, access, inclusion, and other factors. It also requires masterplans for strategic sites and assessments by design review panel. In addition, it sets out the issues that new development in villages should consider and contains particular advice for Ash and Tongham in order to avoid piecemeal development. The new policy is positive and effective.

147. Policy D2 *Sustainable design, construction and energy* contains requirements to achieve sustainable design. The overall thrust of the policy is in accordance with the objectives of the NPPF in meeting the challenge of climate change. However, the policy in effect requires sustainability statements and energy statements for all development proposals, does not establish the baseline against which carbon emissions should be achieved, and requires all development to connect to CHP where it exists, or incorporate infrastructure for it. These requirements are unduly onerous for small developments. In addition, the policy contains a heating and cooling hierarchy which is not reflected in national policy and is likely to be impractical and cumbersome to operate in development management. **MM24** makes it clear that applications should include information about how sustainable design and construction will be incorporated, but it only seeks sustainability statements and energy statements for major development and it requires large developments to demonstrate that CHP has been given adequate consideration. This is a more reasonable and proportionate approach. It also explains the baseline for carbon emissions, which is 20 percent lower than the Target Emission Rate set out in the Building Regulations 2010, and the background text also explains the standard for water efficiency. Subject to this modification, Policy D2 is sound.

148. Policy D3 *Historic environment* aims to conserve heritage assets and seeks design of the highest design quality to sustain and enhance their special interest. However, paragraph 2 of the policy does not reflect the approach in section 12 of the NPPF, since it does not deal adequately with the significance of the heritage asset and the degree of harm, and does not make a distinction of approach between designated and non-designated heritage assets. **MM25** amends this part of the policy and states that the impact of development proposals on the significance of heritage assets and their settings will be considered in accordance with case law, legislation and the NPPF. With this modification, the policy is sound.
149. **MM49** lists the 2003 Local Plan policies that are being superseded.
150. Subject to the modifications described above, the Plan contains effective policies for shaping successful places, achieving sustainable design and construction, protecting heritage assets and promoting good urban design.

Issue 10 – Whether the Plan's strategic allocations at Slyfield Area Regeneration Project, Guildford (A24), Gosden Hill Farm, Merrow Lane, Guildford (A25), Blackwell Farm, Hog's Back, Guildford (A26), Land to the south and east of Ash and Tongham (A29) and Former Wisley Airfield (A35) are sound.

151. The justification for the location of the strategic sites and the strategic level exceptional circumstances for moving Green Belt boundaries are discussed above under the heading of the Spatial Strategy. This section concerns the local impacts of the larger allocations and the effectiveness of the specific policies governing development on these sites

A24 Slyfield Area Regeneration Project

152. Policy A24 sets out the requirements for the mixed use allocation of this site, which is owned principally by Guildford Borough Council and Thames Water with Surrey County Council having a minority interest. About 1,500 homes are planned, of which 1,000 homes will be delivered within the plan period, along with 6 gypsy and traveller pitches, about 6,500 square metres of light industrial (B1c) and trade counters (B8), a waste management depot and waste management facilities, a new sewage treatment works and community facilities. The key issue relates to the ability of the site to deliver the anticipated number of homes within the plan period.
153. The delivery of the allocation is dependent on relocating the existing sewage treatment works, waste facility and depot. Negotiations regarding the sewage works have progressed and the anticipated completion of the relocated facilities is December 2023. In addition, feasibility and design work for the new waste transfer station and recycling centre have been carried out and it is expected that the relocated facilities will be completed in July 2021. Funding has been secured from a range of sources including Homes England and the LEP. In terms of design, a masterplan has been produced which indicates a housing scheme of 4 to 5 storeys with single family housing along the River Wey corridor. The evidence indicates that preparatory work for the

development is well advanced and the site would be likely to deliver development at the rate anticipated by the Plan.

154. It would also seem unlikely that the housing element of the scheme would be delayed by any lag in the provision of the A3 RIS scheme for two reasons: the Strategic Highway Assessment Report demonstrates that the effect of this development on A3 journey times without the A3 RIS scheme would be relatively small; and in any case it is proposed to deliver the housing element of the project towards the later part of the plan period and this is accounted for in the housing trajectory. **MM33** replaces some unclear text in the policy to clarify the need for off-site highway works to mitigate the impact of the development and to set out the requirement to provide the northern route section of the Sustainable Movement Corridor on site and make a proportionate contribution to off-site provision.
155. Having regard to all the above, the evidence gives confidence that the scheme will be delivered as anticipated, and subject to MM33, Policy A24 is sound.

A25 Gosden Hill Farm, Merrow Lane, Guildford

156. Policy A25 is allocated in the submitted Plan for a residential-led mixed-use development delivering about 2,000 homes with a minimum of 1,700 homes during the plan period, as well as gypsy and traveller pitches, retail and service facilities and primary and secondary schools. The delivery trajectory for the site is consistent with the assumed delivery of A3 improvements, but **MM35** reduces the overall site capacity to about 1,800 dwellings based on more recent masterplanning with a consequent reduction in the number of gypsy and traveller pitches to 6. The key issues are whether there are local-level exceptional circumstances to alter Green Belt boundaries, and whether the allocation is acceptable in terms of highway impact.
157. Regarding the Green Belt, the site is adjacent to the built-up area of Guildford and its development would appear as a natural urban extension rather than a major incursion into the Green Belt. The Green Belt and Countryside study considered it to be a medium sensitivity land parcel. The landscape is not subject to any designation and is not crossed by any public right of way. The local topography and tree cover ensure that the site is not widely prominent, and it would be possible to establish a new defensible Green Belt boundary. As discussed above under Issue 7, in respect of openness and countryside impact, the cumulative impact of this allocation in combination with allocations to the east of Guildford is acceptable. MM35 responds to concerns about the visual impact by including a new requirement for increased landscaped buffer/strategic planting with frontage development set back from the A3 and other measures to mitigate the visual impact. The selection of this site is therefore appropriate on the basis of its local characteristics, and exceptional circumstances exist at the local level to alter the Green Belt boundaries to facilitate the allocation.
158. The allocation requires an improved junction on the A3, which is necessary to serve the development. Taking this provision into account, the Strategic Highway Assessment Report (2016) forecasts increased traffic through parts of Burpham in the absence of mitigation, partly as a result of new development traffic and partly as a result of drivers re-routing to make use of the new A3

on-slip. There would be additional pressure on New Inn Lane and the A3100/B2234 roundabout junction. However, Policy A25 contains important requirements that will promote sustainable travel options. These include a park and ride facility: there is a gap in Guildford's park and ride network on the A3 southbound that could provide an alternative option for drivers on the A3 with destinations in Guildford town centre. This will allow new vehicular trips generated by the development to use the headroom on the highway networks provided by the interception of existing trips by the park and ride facility. A further benefit that will encourage trips to shift to sustainable modes of transport is that the headroom created on the A3100 will assist with the provision of the eastern route section of the Sustainable Movement Corridor, or alternatively or additionally, the eastern route section of the Sustainable Movement Corridor off-site could use the A25 Epsom Road via a southern access to the Gosden Hill Farm site and the B2234. Finally, Policy A25 requires land and a proportionate contribution towards delivering Guildford East (Merrow) railway station. These measures will help to mitigate the highways impact of the allocation and MM35 provides greater clarity and precision as regards these requirements. Whilst evidence suggests that recurrent congestion will continue to be experienced, the overall conclusion of the Strategic Highway Assessment Report is that, with the RIS schemes, traffic from the Submission Local Plan allocations should not have a severe impact on the operation of the A3 through the Guildford urban area.

159. Policy A25 speaks of the potential opportunity for an all movements junction at the A3 with the A3100, B2215 and A247, with land potentially being required for a connector road to the B2215/A247 junction, but the status of this requirement is not clear. An all movements junction is not required by Surrey County Council or Highways England. However, it could bring potential benefits to New Inn Lane and the A3100. It is appropriate that consideration is given to the issues at the time of any relevant planning application. MM35 provides the basis for such consideration as part of the development management process, which would include the potential for land to be provided on site to form part of the future route of a connector road to facilitate the junction. This is a sound approach.
160. As regards other issues, two adjacent areas of woodland are designated as sites of nature conservation interest and Policy A25 requires green corridors and linkages to habitats outside the site as an acceptable means of maintaining corridors for biodiversity. This could be dealt with appropriately as part of the masterplan. The policy also requires the provision of SANG to avoid adverse impacts on the SPA; this is identified for part of the woodland and will ensure that high environmental standards are met. A comprehensive management plan for the woodland is under way. The policy's approach to these issues is sound.
161. MM35 responds to the new overarching policy on design, Policy D1, introduced by MM23, by incorporating a requirement that the scheme should create unique places that combine the highest standards of good urban design with well-designed streets and spaces and incorporate high quality architecture that responds to the unique context of the site.
162. Finally, MM35 aims to ensure that run-off from the site is no greater than run-off rates from the site before development and that the risk of flooding

elsewhere is reduced as far as practicable. This modification is in accordance with the NPPF which states that flood risk should not be increased elsewhere.

163. Taking into account all the relevant considerations, Policy A25 *Gosden Hill Farm, Merrow Lane, Guildford* is sound.

A26 Blackwell Farm, Hog's Back, Guildford

164. This is a residential-led mixed use allocation for about 1,800 homes of which a minimum of 1,500 would be delivered in the plan period, together with about 30,000 square metres of B1 use on 10-11 hectares as an extension to the Surrey Research Park. The application would also allow for specialist and self-build plots, 6 gypsy and traveller pitches, a primary school, a secondary school and retail and community uses. **MM36** increases the B1 floorspace to 35,000 square metres based on recent estimates of capacity, although the amount delivered in the plan period and the overall area for B1 would remain the same as in the submitted plan. The key issues are whether there are local-level exceptional circumstances to alter Green Belt boundaries, the effect on the Surrey Hills AONB and the Area of Great Landscape Value, and whether the allocation is acceptable in terms of highway impact.

165. The strategic-level circumstances for altering Green Belt boundaries are discussed above. As regards the local circumstances, the Green Belt and Countryside study identifies the site as a potential development area. It is on gently sloping land on the edge of Guildford adjacent to the Research Park and is well-enclosed by woodland and hedgerows which visually separate the allocation from the more open land to the west and would form good defensible boundaries. The site is well separated from the historic centre of Guildford by extensive development and does not contribute to the setting of the Cathedral or its historic core. It would appear as a logical addition to Guildford rather than an obtrusive extension into the wider Green Belt. It would make an important contribution towards meeting housing, employment and educational needs and has obvious locational advantages, firstly in terms of its position immediately adjacent to the Research Park, presenting a unique opportunity to further enhance this already successful business cluster, and secondly in its ability to contribute towards sustainable transport including a new station. There are therefore exceptional circumstances at the local level to justify moving the Green Belt boundary to accommodate this site allocation.

166. Turning to landscape issues, the development itself would sit well below the Hog's Back which is part of the AONB and AGLV. There would be glimpsed views of the development from the Hog's Back, but only from a limited part of its eastern end through the vegetation belt that lines the hill, and partly in the context of the Research Park and Park Barn. It would have very little impact on the character of the AONB and AGLV and their settings.

167. However, the access road from the site to the A31 would pass up the hill through part of the AONB. Cutting and grading together with junction and vehicle lighting would have some visual impact. With carefully designed alignment, profiling and landscaping, the effect is capable of mitigation, but the submitted Plan does not allow for adequate land to find the best road alignment both in highways and landscape terms or to mitigate its impact through landscaping. **MM37** introduces new Policy A26a *Land for access road*

between A31 Farnham Road and Blackwell Farm, Hogs Back, Guildford. This is a site allocation which seeks the best landscape and design solution, taking into account the topography, the existing trees, the need for additional landscaping, and the needs of all users, including walkers and cyclists as well as vehicles entering and leaving the site. It also requires mitigation measures to reduce the landscape impact including sensitive lighting and buffer planting. This modification allows for an appropriate design solution to be developed. Subject to MM37, the scenic beauty of the AONB would be conserved.

168. With respect to highways impact, evidence extracted from the Strategic Highway Assessment Report indicates that the percentage of traffic related to Blackwell Farm would be relatively small in morning and evening peak periods with the most significant increase occurring on the section of the A31 west of the proposed site access and east of the connections with the A3 slip roads. However, whilst this is significant in percentage terms it is a relatively small increase in traffic flows with an average increase per minute of less than five vehicles. This also applies to Egerton Road in that the percentage increases are relatively high, but the absolute increases are less than three vehicles per minute in total. On the section of B3000 through Compton village during the average AM peak hour period the additional trips would be 34 vehicles in the hour and in the average PM peak hour they would be 12 vehicles in the hour.
169. These figures do not point to a significant adverse impact on the highway network. Moreover, Policy A26 contains a requirement to provide a new route for employees and emergency vehicles to the Surrey Research Park, the University's Manor Park campus and Royal Surrey County Hospital which would reduce the impact on the A3/A31 junction in advance of the A3 Guildford RIS scheme. In addition, the location of the allocation immediately adjacent to the Research Park and close to the Hospital and campus would encourage walking and cycling particularly in combination with the Sustainable Movement Corridor.
170. The policy also contains requirements to encourage more sustainable means of transport. These include the provision of the western section of the Sustainable Movement Corridor on the site and a contribution towards it on the local road network; the provision of bus services to serve the site, the town centre and the western suburbs of Guildford; and a proportionate contribution towards the delivery of the Guildford West (Park Barn) railway station which is allocated under Policy A59. There is a lack of clarity in some of the policy requirements relating to these measures and MM36 modifies the wording to provide greater clarity and ensure that they are fairly and reasonably related to the development.
171. The highway measures in combination with the other steps designed to encourage the use of more sustainable means of transport will ensure that the allocation does not have a significantly adverse effect on the highway network.
172. On other matters, it would be possible to protect the adjacent site of nature conservation interest and Policy A26 requires green corridors which link habitats outside the site and the adjoining Site of Nature Conservation Interest. It also seeks bespoke SANG to avoid adverse impacts on the Thames Basin Heaths Special Protection Area. Its approach to biodiversity matters is sound. As regards flood risk, MM36 indicates that run off from the site should

be no greater than run off rates before development; in policy terms this is an acceptable way of ensuring that the development does not contribute to surface water flooding.

173. MM36 responds to the new overarching policy on design, Policy D1, introduced by MM23, by incorporating a requirement that the scheme should create unique places that combine the highest standards of good urban design with well-designed streets and spaces and incorporate high quality architecture that responds to the unique context of the site.
174. Subject to the main modifications described above, Policy A26 *Blackwell Farm, Hog's Back* is sound.

Policy A29 Land to the south and east of Ash and Tongham

175. This area is allocated for about 1,750 homes including some self-build and custom plots. The land is beyond the Green Belt and would amount to an extension to the urban area of Ash and Tongham. The key issue is the effect on the highway network.
176. There are existing capacity issues arising from congestion at the A31/A331 junction, the A323/A331 junction and A323 Guildford Road. The Strategic Highway Assessment Report identified that Local Plan growth could exacerbate existing conditions around Ash and Tongham, and the aim of the Guildford Borough Transport Strategy is to accommodate the traffic impacts of this allocation through a number of infrastructure projects, to limit the amount of development-related traffic on unsuitable roads and bring traffic back onto the principal A roads. Policy A29 contains a requirement for the proposed road layout for these sites to provide connections between the various developments to maximise accessibility and help alleviate congestion on the A323 corridor.
177. The level crossing at Ash on the A323 is closed for about 20 minutes in every hour and 127 times a day (on November 2016 figures). Network Rail identifies the crossing as being within the top 20% of crossings in terms of safety risk and has raised safety concerns regarding the impact of the scale of development from sites which are represented in Policy A29 on the operation of the level crossing at Ash railway station. Network Rail, Guildford Borough Council and Surrey County Council all consider that an alternative means of access over the railway for both vehicular and non-motorised users should be provided to facilitate further development in this area.
178. The removal of the level crossing and the provision of a new bridge would considerably reduce delay and lessen rat-running by keeping traffic on the A323. Policy A29 contains a requirement to make land available and provide a new bridge for the A323 and associated footbridge. A preferred layout has been produced, designed and costed, and funding sources have been identified including Network Rail, Homes England and various development sites. On the basis of all the evidence, the provision of this bridge is necessary for the allocation to proceed and this aspect of the policy is sound.
179. Finally, on other matters, Policy A29 lacks clarity about how the settings of Ash Green village and Ash Manor are to be protected and **MM38** goes into

greater detail about what is expected. This modification is required for soundness.

A35 Former Wisley airfield, Ockham

180. The former Wisley airfield (Policy A35) is a residential-led development for about 2,000 homes together with about 100 sheltered / Extra Care homes, 8 gypsy and traveller pitches, employment land, retail facilities, services, community uses and a new primary and secondary school. The key issues are whether there are local level exceptional circumstances to alter the Green Belt boundary to accommodate the allocation; transport impacts; and the effect on biodiversity.
181. Before moving on to those issues it is necessary to refer to the Secretary of State's refusal of 13 June 2018 and the accompanying Inspector's report in respect of appeal ref no APP/Y3615/W/16/3159894 for a new settlement of up to 2,068 dwellings on land at Wisley airfield. The principal reasons for refusal concerned Green Belt, the strategic road network and the character and appearance of the area. Many other issues were examined during the course of the inquiry, including the effect on the Thames Basin Heaths Special Protection Area, the local road network and air quality, but were not cited as reasons for refusal. The harm to heritage assets was considered less than substantial and was outweighed by the public benefits. It is important to note that this appeal decision was made in the context of the background of the saved policies of the Guildford Borough Local Plan 2003, against which the scheme was unlikely to be considered anything other than inappropriate development in the Green Belt and development affecting the character of the countryside. However, the conclusion of this report is that there are compelling strategic-level exceptional circumstances to make significant alterations to the Green Belt boundary to accommodate the Borough's assessed housing, employment and other needs to 2034.
182. As regards local-level exceptional circumstances, the Green Belt and Countryside Study considered this site to be of medium Green Belt sensitivity. It shares little of the character of the countryside around it; most of the site is flat, rather featureless, contains a runway and hard surfacing and can be regarded in part as previously developed land. It is separated from much of Ockham by a valley and a small knoll. Development here would be fairly self-contained visually, and would not add to the appearance of sprawl.
183. The allocation has the ability to deliver a significant contribution towards the Borough's housing requirement, helping to meet a pressing housing need as well as providing homes to meet the needs of particular groups. Its size means that it can support a suitable range of facilities to meet the needs of the new residents, creating the character of an integrated large new village with its own employment, schools, shops and community facilities, and it can support sustainable transport modes. This would avoid putting pressure on other areas of the Green Belt of greater sensitivity, and would avoid pressure on other communities too, because alternative smaller sites would be less able to deliver such a comprehensive range of facilities to serve the development. For all the above reasons there are exceptional circumstances at the local level to alter Green Belt boundaries to accommodate this allocation.

184. Turning to transport impacts, the site is well located in relation to the strategic road network. It would be accessed via all modes of transport from the A3 Ockham roundabout and Old Lane. The M25 Junction 10 RIS scheme is due to start in 2020/21, with completion in 2022/23; housing delivery is due to commence on the site in 2022/23, timed to coordinate with the RIS scheme. The allocation would support a number of mitigation measures on local roads and would fund the provision of two new slip roads at the junction of the A3 with the A247 Clandon Road at Burnt Common to mitigate traffic impacts on Ripley.
185. Highways England had objected to the scheme refused on appeal in June 2018. However, in the agreed position statement of 11 June 2018 between Highways England and the site owners, Highways England stated that subject to certain terms set out in the statement, it was expected to withdraw its objection. One of those terms was the potential for a financial contribution in lieu of highway capacity improvements by the developer. The position statement also indicated that the Burnt Common slip roads could be secured by a Grampian condition. This evidence indicates that the concerns expressed by the Inspector and Secretary of State about the impact of the appeal scheme on the strategic road network are capable of resolution in the context of the Plan allocation.
186. Policy A35 requires the developer to provide in perpetuity extended and/or new bus services to serve the site and Effingham Junction railway station and/or Horsley railway station, Guildford and Cobham. It also requires the provision of an off-site cycle network to those stations and to Ripley and Byfleet. These requirements would assist in mitigating the traffic impact of the development.
187. As with certain other site allocations, there is a lack of clarity in some of the policy requirements relating to these measures and **MM40** modifies the wording to provide greater clarity and ensure that they are fairly and reasonably related to the development.
188. In conclusion, subject to the policy requirements as modified, the allocation would not have a severely adverse impact on either the strategic or local road network.
189. Matters concerning the Thames Basin Heaths Special Protection Area are dealt with in Issue 7. Policy A35 requires bespoke SANG to avoid impacts on the SPA. At the time of the appeal, Natural England was satisfied that the appeal proposal would not have a significant effect on the SPA and, as highlighted above, this was not a reason for refusal. Site A35 is larger than the appeal scheme but Natural England has confirmed that it would have no in-principle objection to the expanded site as there is sufficient land available to create additional SANG. Policies P5 and A35 require adequate and appropriate mitigation and avoidance measures to ensure that there is no adverse effect on the Special Protection Area.
190. The site includes an area designated as a Site of Nature Conservation Interest. The development advantages of the site outweigh the protection afforded by the designation of the SNCI and it is not appropriate to maintain the designation within the area for development, but there is scope for the

designation to be made on parts of the site that are proposed to remain undeveloped; **MM50** makes the appropriate modification. MM40 requires every effort to be made to reduce the harm to the SNCI through appropriate avoidance and mitigation measures.

191. The development will require sufficient capacity to be available within Ripley wastewater treatment works and MM40 appropriately makes this a requirement of the policy.
192. Finally, MM40 responds to the new overarching policy on design, Policy D1, introduced by MM23, by incorporating a requirement that the scheme should create unique places that combine the highest standards of good urban design with well-designed streets and spaces and incorporate high quality architecture that responds to the unique context of the site.
193. Having regard to all the evidence, the allocation of Policy A35 *Former Wisley airfield, Ockham* is sound.

Conclusion

194. Subject to the main modifications described above, the Plan's strategic development allocations are sound.

Issue 11 – Whether the Plan's other development allocations are sound

Guildford urban area and nearby

195. There are no further key issues arising from Policies A1 to A14, all of which are sites in or close to Guildford town centre; the relevant issues have been discussed previously in relation to retailing, development capacity, urban design and the sustainable movement corridor.
196. Policies A15 to A21 relating to various site allocations in the Guildford urban area are sound. The housing allocations would provide a significant number of additional homes in sustainable locations within the town. With sensitive design and appropriate scale it would be possible to achieve the development of 100 homes on site A15 without harming the setting of Guildford Cathedral.
197. Policy A22 *Land north of Keens Lane Guildford*, allocated for about 150 homes and a care home, has been discussed above in relation to the SPA: the need to discourage access to the SPA can be resolved by design and layout and by a use class restriction. The Green Belt and Countryside Study identified a potential development area on this site. It is close to residential development, is well enclosed and is not subject to any landscape or heritage designations and it is not in an area of flood risk. The site presents an opportunity to contribute towards much needed housing adjacent to the Guildford urban area. There are therefore exceptional circumstances to alter Green Belt boundaries to provide for the allocation.
198. Policy A23 *Land north of Salt Box Road, Guildford*, allocated for a burial ground, has been discussed above in relation to the SPA; no further key issues arise from this allocation.

199. Policy A32 *Surrey Police Headquarters, Mount Browne* provides an opportunity to develop 116 homes on a previously developed site; the site is located in the AONB and the policy seeks positive benefits in terms of landscape and townscape character and local distinctiveness. The adjacent allocation A33 *The University of Law, Guildford* makes good use of the car park area of a developed site to provide 112 student bedspaces; with appropriate scale and design, the character of the setting of the nearby Grade II listed Braboeuf Manor can be preserved. The Plan alters the Green Belt boundary to exclude both allocations from the Green Belt and to inset the University of Law. Both sites are previously developed land and the allocation is therefore likely to have little effect on the openness of the Green Belt. The allocations make good use of the site to meet housing and student needs and the alteration of the Green Belt is justified by exceptional circumstances.

Ash Green

200. Policies A27 *Warren Farm, White Lane, Ash Green* and A28 *Land to the east of White Lane, Ash Green* represent acceptable clearly defined and suitable sites for housing close to Ash Green and are sound.

West Horsley and East Horsley

201. Policy A37 *Land to the rear of Bell and Colvill, West Horsley*, Policy A38 *Land to the west of West Horsley*, Policy A39 *Land near Horsley railway station, East Horsley* and Policy A40 *Land to the north of West Horsley* are all moderate-sized housing allocations adjacent to the two villages. They are well-enclosed sites; A37 is surrounded by development, A38 and A40 have development on three sides and A39 has development to the east and north and the railway line to the south. The allocations would be proportionate to the existing size of the villages and in every case they would result in a more logical and defensible Green Belt boundary. A38, A39 and A40 are within easy walking distance of Horsley station and local shops; A37 is within cycling distance. They would provide much needed housing in locations close to village facilities. For all these reasons there are exceptional circumstances to alter the Green Belt boundaries to provide for these allocations.

202. The East Horsley Neighbourhood Plan, policy EH-H6 included the Thatcher's Hotel as a housing site subject to it being justified in accordance with adopted local plan policy. The relevant policy in the Guildford Local Plan is Policy E6, which resists the loss of visitor attractions unless there is evidence that (among other things) there is no longer a need for the facility, or unless the existing use is unviable and the site has been adequately marketed. For the site to be developed for housing, the criteria in Policy E6 would need to be met. There is no conflict between the two policies.

203. Through **MM51**, the Council sought to move the Green Belt boundary along part of the western edge of West Horsley closer towards the properties in Ripley Lane. However, the boundary in the submitted plan follows a clear and defensible line between the arable land to the west and the gardens and grassed areas associated with the village properties along the lane. The change in the Green Belt boundary in MM51 is not needed to ensure the Plan is sound and the modification should not be adopted.

Send, Send Marsh, Burnt Common and Ripley

204. Policy A42 *Clockbarn Nursery, Tannery Lane, Send*, Policy A44 *Land west of Winds Ridge and Send Hill, Send* and Policy A45 *Land at the rear of the Talbot, High Street, Ripley* are modest-sized housing allocations (with 2 traveller pitches in the case of A44) on the edges of these villages. A42 is on the site of the Clockbarn Nursery; A44 and A45 are adjacent to existing development and are enclosed by vegetation. They are well-located and proportionate in relation to the villages; their allocation would have limited impact on the openness of the Green Belt and in each instance it would be possible to create good defensible boundaries. Their size is modest enough to have only a very limited effect on vehicle movements. There are therefore exceptional circumstances to alter Green Belt boundaries to provide for the allocations.

205. Policy A43 *Land at Garlick's Arch, Send Marsh/Burnt Common and Ripley* is a larger allocation for about 400 homes including some self-build and custom homes and 6 plots for travelling showpeople. **MM41** increases the capacity to 550 homes on the basis of a recent assessment of capacity. This is a well-defined site, enclosed by the built-up areas of Burnt Common and Send Marsh together with the B2215 Portsmouth Road, the A3 and tree belts and hedges, and because of this it would be possible to create effective defensible boundaries to the site. In response to concerns about the in-combination landscape and Green Belt impact of this with other allocations to the east of Guildford, as discussed in Issue 7, MM41 includes a further requirement for an increased landscaped buffer/strategic planting and development set back from the A3. Subject to MM41, the allocation would not contribute to sprawl or coalescence. In consequence the allocation would have a limited impact on the wider openness of the Green Belt.

206. The site is well-related to the village and close to a convenience store and there are a number of other facilities including schools, shops and community facilities within a short distance of the proposed site. However, there are currently no pedestrian crossings provided between the site and the existing residential areas accessed off Send Marsh Road to the east, and opportunities exist to widen footways and enhance street lighting, construct new footway on the southern side of Portsmouth Road and create a new pedestrian crossing in order to create a more attractive route for pedestrians to and from the site. MM41 therefore adds a requirement to provide pedestrian and cycle routes into the development from the B2215 to improve connections into the village.

207. Policy A58 *Land around Burnt Common Warehouse, London Road, Send* is a plan allocation for a minimum of 7,000 square metres of B1, B2 and B8 close to A43 but to the west of Burnt Common. **MM42** increases the site allocation to a minimum of 14,800 square metres for reasons discussed in Issue 3. Like A43, the site is well enclosed between the A3 and B2215 and it already contains a warehouse; it contributes little to the openness of the wider Green Belt, and for the same reasons that lie behind MM41, MM42 also requires an enhanced landscape buffer along the A3. The site is in a good location adjacent to the strategic road network and will benefit from the A3 slip roads allocated in Policy A43a. For all these reasons (and those discussed in Issues 3 and 5) there are exceptional circumstances to alter the Green Belt boundaries to enable this site to meet employment needs over the plan period.

208. Turning to transport issues arising from all these sites, the first point is that A43 and A58 are close to the site allocated by Policy A43a *Land for new north facing slip roads to/from the A3*. The purpose of these slip roads has previously been discussed in relation to Issue 8 and would mitigate the effect on Ripley from A35 *Former Wisley airfield*, but they would also benefit allocations A43 and A58 by providing excellent access to the strategic road network from the site allocations. In addition, substantial housing delivery from the development would be likely to coincide with the completion of the M25 J10/A3 RIS scheme in 2022/23.
209. Secondly, as regards traffic through Send, forecasts taking into account all the developments, based on the Strategic Highway Assessment Report, show only a 10% increase in vehicle movements travelling northbound on the A247 Send Road in the average morning peak hour and 2% in the average evening peak hour, with decreases of 7% and 19% respectively southbound. Having regard to these figures, and against the background of all the developments, the changes in the capacity of the sites arising from MM41 and MM42 are unlikely to result in significant adverse conditions. MM41 also adds a requirement for the main vehicular access to A43 to be from the A247 and for a through vehicular link between the A247 and the B2215 to relieve pressure on the Send Marsh roundabout.
210. Thirdly, the constrictions on the A247 southbound towards West Clandon are recognised, but MM41 and MM42 add requirements to A43 and A58 respectively which require the developments to make necessary and proportionate contributions towards an off-site walking network to the centre of Send, the Burnt Common warehouse site and to Clandon railway station, which is not far to the south; and towards mitigation schemes to address the impacts on communities and the environment in Send, West Clandon and Ripley. Connected with this, as referred to above under the Spatial Strategy, **MM48** adds a new scheme to the schedule, A247 Clandon Road/The Street (West Clandon) traffic management and environmental improvement scheme.
211. Fourthly, there are existing bus services and bus stops in the vicinity of the sites which provide links to Cobham, Esher, Guildford, Kingston, Surbiton and Woking, and there is an opportunity to link the development to a half hourly new bus service provided by the Wisley Airfield development when that obligation is triggered.
212. These four factors will ensure that the allocations will not have a significantly adverse effect on the highway network and on nearby communities.
213. Having regard to all the above, the Plan's allocations in Send, Send Marsh, Burnt Common and Ripley are all sound, subject to the main modifications. The allocations would make a very effective contribution towards meeting the Borough's significant housing and employment needs. There are exceptional circumstances for altering Green Belt boundaries to accommodate all of these allocations.

Allocations for sites for gypsies, travellers and travelling showpeople

214. Policies A49 to A57 allocate a range of small sites for gypsy and traveller pitches and plots for travelling showpeople in suitable locations subject to a range of criteria. There are no opportunities to meet all this need on non-

Green Belt land and exceptional circumstances exist for the alteration to the Green Belt boundary to ensure that the Plan's requirement for these forms of development is met, and to allow for the delivery of the allocations in accordance with the Policy's development requirements.

Allocations added as main modifications

215. Policies A61 *Land at Aaron's Hill, Godalming*; A62 *Land at Hornhatch Farm, adjoining New Road, Chilworth*; A63 *Land west of Alderton's Farm, Send Marsh Road, Send*; and A64 *Land between Glaziers Lane and Strawberry Farm, Flexford* have already been referred to in the housing section of this report. They were included as main modifications MM39, MM43, MM44 and MM45 respectively in order to increase housing delivery in the early years of the plan and to avoid a stepped housing trajectory against a housing requirement of 672 dpa, as set out in the original version of MM2. However, the revised version of MM2 has a requirement of 562 dpa and this can be met through the original allocations in the submitted Plan, with adequate levels of housing delivery in the early years. Since these allocations are all in the Green Belt and as their locational characteristics were rightly ranked lower than the sites in the submitted Plan, the exceptional circumstances for altering Green Belt boundaries to accommodate them no longer exist. That remains the case with Land at Aaron's Hill even though the Waverley part of the site is being brought forward for housing to meet that Borough's housing requirement. These allocations are not recommended for adoption and there is no need to modify the submitted plan to include them.

Assessment of Legal Compliance

216. My examination of the legal compliance of the Plan is summarised below.

217. The Local Plan has been prepared in accordance with the Council's Local Development Scheme.

218. Consultation on the Local Plan and the main modifications was carried out in compliance with the Council's Statement of Community Involvement (called Community Involvement in Planning 2013). MM2 with a reduced housing requirement was not consulted on at the same time as the other main modifications but it had widespread publicity and was debated extensively at the February 2019 hearings as discussed in my report.

219. Sustainability Appraisal has been carried out and is adequate. It was unnecessary to carry out a further sustainability appraisal in relation to MM2 since the level of housing provision was within the range of options tested by the SA and the housing sites were the same as those in the submitted Plan.

220. The Habitats Regulations Assessment (November 2017) contained both an evaluation of the likely significant effects and an appropriate assessment, and was followed by an HRA Update of June 2018, an HRA Addendum of September 2018 which accompanied the MM consultation and an HRA Addendum of January 2019 to address issues arising during the examination as well as new European case law.

221. The Local Plan includes policies designed to secure that the development and use of land in the local planning authority's area contributes to the mitigation of, and adaptation to, climate change.
222. The Local Plan complies with all relevant legal requirements, including in the 2004 Act (as amended) and the 2012 Regulations.
223. I have had due regard to the aims expressed in s149(1) of the Equality Act 2010.

Overall Conclusion and Recommendation

224. The Plan has a number of deficiencies in respect of soundness and legal compliance for the reasons set out above, which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues set out above.
225. The Council has requested that I recommend MMs to make the Plan sound and legally compliant and capable of adoption. I conclude that, with the recommended main modifications set out in the Appendix, the Guildford Borough Local Plan: strategy and sites satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

Jonathan Bore

Inspector

This report is accompanied by an Appendix containing the Main Modifications.