

# Authority Monitoring Report

# **Guildford Borough Council**

1 April 2021 – 31 March 2022

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# **Executive Summary**

The Authority Monitoring Report ('AMR') has been prepared in accordance with the requirements of national legislation (the Localism Act 2011, the Town and Country Planning (Local Planning) England Regulations 2012 and the Planning and Compulsory Purchase Act 2004) and the direction of national Planning Practice Guidance ('PPG')<sup>1</sup>.

Monitoring is an essential part of the planning process, providing an opportunity to review the performance of planning policies in the context of set objectives and indicators. Annual Monitoring Reports are required to report on a range of specific topics and outline progress against certain targets; including, among other things, providing information on the Council's:

- progress in plan-making activities,
- activity in relation to the duty-to-cooperate,
- implementation of policies in the Local Plan, and
- implementation of neighbourhood plans.

This Authority Monitoring Report (2021 – 2022) covers the Monitoring Period between 1 April 2021 to 31 March 2022.

The Local Plan: Strategy and Sites (2015 - 2034) was adopted on 25<sup>th</sup> April 2019. Some Development Management policies from the Local Plan (2003) were not superseded and remain in effect. This AMR discusses the policies and performance indicators that formed the adopted development plan during that time and data is available to assess.

The Council undertook data migration to a new monitoring database in the 2019 - 2020 monitoring period. The new database supports the collection and analysis of data required to assess performance against the Monitoring Indicators introduced in the Local Plan: Strategy and Sites (2015 - 2034).

#### **Further information**

For further information please:

- Visit the Local Plan Webpage at: https://www.guildford.gov.uk/localplan
- Email us at: planningpolicy@guildford.gov.uk, or
- Phone us on: 01483 444 471

<sup>&</sup>lt;sup>1</sup> Available online at: https://www.gov.uk/government/collections/planning-practice-guidance.

# Contents

| 1.         | Introduction   | 5    |
|------------|--|------|
|            | What is an Authority Monitoring Report?  | 5    |
|            | What is included in an Authority Monitoring Report?  | 5    |
| 2.         | Policy Context   | 7    |
|            | The Development Plan   | 7    |
|            | Local Development Scheme   | 7    |
|            | Neighbourhood Development Plans and Orders   | 8    |
|            | Supplementary Planning Documents   | 9    |
| 3.         | Monitoring Indicators  | .10  |
|            | Housing  | . 10 |
| 4.         | Employment and Retail  | .28  |
|            | Employment Floorspace  | . 28 |
|            | Retail floorspace  | . 30 |
| 5.         | Planning Contributions   | .40  |
|            | Community Infrastructure Levy ('CIL')  | . 40 |
|            | Section 106 Annual Review  | . 40 |
|            | Thames Basin Heaths Special Protection Area  | 41   |
| <b>6</b> . | Duty to Cooperate  | .41  |
| 7.         | Evidence Base  | .42  |
| 8.         | Appendices   | .43  |
|            | Appendix 1 - Duty to cooperate matrix of prescribed bodies and strategic issues.<br>Appendix 2 – TBH SPA Position Statement 2022 |      |

# 1. Introduction

## What is an Authority Monitoring Report?

1.1. The Authority Monitoring Report (2021/22) ('AMR') contributes to the suite of documents that comprise and support the Development Plan for Guildford Borough Council ('the Council'). The purpose of the AMR is to review the progress of development activity and the effectiveness of Local Plan policies in achieving their objectives.

1.2. This is the second year in which Guildford Borough Council has published this document as the 'Authority Monitoring Report'. In previous years, it has been published as the 'Annual Monitoring Report'.

1.3. The AMR has been prepared in accordance with the requirements of national legislation (the Localism Act 2011, the Town and Country Planning (Local Planning) England Regulations 2012 and the Planning and Compulsory Purchase Act 2004) and the direction of national Planning Practice Guidance. AMRs are required to report on a range of specific topics and outline progress against certain targets; including, among other things, providing information on the Council's:

- progress in plan-making activities,
- activity in relation to the duty-to-cooperate,
- implementation of policies in the Local Plan, and
- implementation of neighbourhood plans.

# What is included in an Authority Monitoring Report?

1.4. National Planning Practice Guidance requires that:

Local planning authorities must publish information at least annually that shows progress with Local Plan preparation, reports any activity relating to the duty to cooperate and shows how the implementation of policies in the Local Plan is progressing<sup>2</sup>.

- 1.5. In meeting these obligations, this AMR includes discussion of, among other things:
  - the monitoring of policy indicators as set out in the Local Plan;
  - the progress of each document in the Local Development Scheme (LDS), including reasons for lack of progress where appropriate;
  - the adoption of Development Plan Documents and Supplementary Planning Documents;
  - the principal activities undertaken in relation to the duty-to-cooperate;
  - monitoring information in respect of SANG financial considerations and;
  - monitoring information in relation to the development of housing, economic and other key land uses, including consideration of the self-build and custom housebuilding register.

<sup>&</sup>lt;sup>2</sup> PPG Paragraph 027; Reference ID: 12-027-20170728.

1.6. This AMR reports on the financial year from 1<sup>st</sup> April 2021 to 31<sup>st</sup> March 2022 (the monitoring period).

### How will the Authority Monitoring Report be used?

1.7. Alongside other evidence-base documents, the AMR comprises one of the suite of documents that supports the Council's development plan.

1.8. National Planning Practice Guidance ('PPG') provides a short commentary on the role of the Monitoring Report<sup>3</sup>. Importantly, the AMR should be designed to enable communities and interested parties to remain aware of the Council's progress in development planning and delivery; including its plan-making activities and implementation of neighbourhood plans that have been brought into force. The AMR may also be used to help Councils determine whether there is a need to undertake a partial or full review of their Local Plan.

<sup>&</sup>lt;sup>3</sup> PPG, 'Plan-Making' section, Paragraph 073; Reference ID:61-073-20190315.

# 2. Policy Context

### The Development Plan

2.1. The Council's development plan comprises a number of documents, including:

- The Local Plan: Strategy and Sites (2015 2034),
- The non-superseded saved policies of the Guildford Borough Local Plan (2003),
- Neighbourhood Plans that have passed a referendum of local residents,
- Surrey Minerals and Waste Plans, and
- Saved policy NRM6 of the South East Plan 2009.

2.2. National legislation (the Town and Country Planning Act 1990 and the Planning and Compulsory Purchase Act 2004) requires that "applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise"<sup>4</sup>.

2.3. In the determination of planning applications, national legislation requires that the Council must give great weight to its development plan policies, according to their degree of consistency with the NPPF (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given)<sup>5</sup>. Importantly, Councils may also give emerging policies some degree of weight in accordance with criteria outlined in the NPPF at paragraph 48. The Council must also give significant weight to other primary material considerations, such as the NPPF itself and the Council's own Supplementary Planning Documents, among other things.

2.4. Local Planning Authorities are required to identify in their Authority Monitoring Reports where the authority is not implementing a policy specified in a local plan and provide justification for this<sup>6</sup>. During the monitoring period being reported, the Council applied all of the saved policies in the Local Plan (2003) where relevant, in so far as they accorded with the NPPF. Policies which did not accord with the NPPF were also considered in the decision-making process and provided weight accordingly.

2.5. All policies that form part of the Local Plan Part 1: Strategy and Sites were given full weight as part of the development plan. The emerging policies that form part of the Local Plan Part 2: Development Management Policies were given some very limited weight during the monitoring period. Three days of hearing sessions were held during the current monitoring period (2022/23) and some weight is now being given to the emerging policies in that Plan.

# Local Development Scheme

2.6. The Local Development Scheme ('LDS') sets out the Council's timetable for producing new planning documents. The Council's adopted LDS (December 2021) is

<sup>&</sup>lt;sup>4</sup> NPPF Paragraph 2.

<sup>&</sup>lt;sup>5</sup> NPPF Paragraph 48.

<sup>&</sup>lt;sup>6</sup> See Regulation 34 of the Town and Country Planning Regulations (2012).

available to view at the following link: https://www.guildford.gov.uk/lds. The 2021 LDS was adopted on 23<sup>rd</sup> November 2021.

2.7. The adoption of the latest LDS was within the monitoring period covered in this AMR.

2.8. Where the Council's Local Development Scheme does not reflect the likely trajectory of the production of planning documents, it is required to set out the reasons for the delay. The Regulation 19 consultation for the Local Plan: Development Management Policies was undertaken in accordance with the LDS (2021) in January – February 2022. Whilst outside of the monitoring period, the Local Plan: Development Management Policies was also submitted to the Secretary of State in accordance with the LDS (June 2022). It is currently anticipated that the plan will be adopted, and therefore given full weight in decision making, during March 2023.

#### Status and progress of the New Local Plan

2.9. Guildford Borough Council has been developing a new Local Plan since 2012. The new Local Plan is intended to comprise two parts. Part 1 is the 'Strategy and Sites' document, which contains the vision, objectives and strategy for the borough up to 2034. Part 2 is the 'Development Management Policies' document, which provides greater detail in how proposals should be determined and developed.

2.10. The Local Plan: Strategy and Sites (2015 – 2034) was adopted on 25<sup>th</sup> April 2019 and constitutes Part 1 of the Local Plan. The policies in this plan are applied full weight in the determination of planning applications. Part 2 of the Plan, 'Development Management Policies' is currently being produced by the Council, and at time of publication carries (in the main) considerable weight in planning decisions.

2.11. The 'Development Management Policies' plan was subject to a six week 'Regulation 19' consultation from 7<sup>th</sup> January 2022 – 18<sup>th</sup> February 2022<sup>7</sup>. The consultation responses received during this period have been reviewed, and a submission version of the Plan has been submitted to the Planning Inspectorate. A public examination took place in November 2022, and the Council is currently awaiting comments from the Planning Inspector assigned to the Plan.

2.12. At time of publication of this Authority Monitoring Report, the Council is undertaking a 7 week consultation regarding main modifications to the submission version of the Plan. The Inspector will finalise his report outlining the necessary main modifications needed to make the plan 'sound' following the consultation.

### **Neighbourhood Development Plans and Orders**

2.13. Neighbourhood planning was introduced through the Localism Act (2011) to allow qualifying bodies (parish and town Councils, and neighbourhood forums) to produce neighbourhood plans and neighbourhood development orders. Neighbourhood plans allow communities to set planning policies for their area.

<sup>&</sup>lt;sup>7</sup> See Regulation 18 of the Town and Country Planning Regulations (2012). Available online at: https://www.legislation.gov.uk/uksi/2012/767/regulation/19/made.

Clandon, Effingham, West Clandon, West Horsley, Puttenham, Send, Seale and Sands, and the wards of Burpham and Lovelace (Lovelace encompasses the parishes of Ockham, Ripley and Wisley)<sup>8</sup>. East Clandon was designated on the 20<sup>th</sup> October 2022, which is outside of this monitoring period.

- 2.16. On the 17<sup>th</sup> March 2022, eligible residents were able to vote in the West Clandon neighbourhood plan referendum. The plan passed the referendum and became part of the development plan. It was later formally adopted on the 5<sup>th</sup> April 2022, which is outside of the monitoring period covered in this report.
- 2.17. Four Parish Councils, Albury, Artington, East Clandon and Seale and Sands are currently working to produce Neighbourhood Plans for their respective neighbourhood areas. The Council has been supporting this process by providing advice and guidance. The Council is also liaising with other prospective qualifying bodies to help them decide whether they would like to apply to designate a neighbourhood area in order to begin the process of neighbourhood planning.

## **Supplementary Planning Documents**

- 2.18. The Council did not adopt any Supplementary Planning Documents ('SPD') during the monitoring period.
- 2.19. The draft Parking Standards SPD was consulted upon alongside the draft Development Management Policies during the period 21<sup>st</sup> January 2022 to 18<sup>th</sup> February 2022. The Council's ambition is that the now renamed Parking Standards for New Development SPD will be adopted in March 2023, following the adoption of the Development Management Policies. This would be during the next monitoring period (2022 - 2023).

<sup>&</sup>lt;sup>8</sup> The Neighbourhood Areas can be seen on the interactive map at: https://www.guildford.gov.uk/neighbourhoodplanninginformation.

# 3. Monitoring Indicators

# Housing

3.1. The following section considers those monitoring indicators relating to the development of homes in the borough.

#### **Overall Housing Numbers**

#### Annual Housing Requirement

3.2. The Local Plan: Strategy and Sites (2015 - 2034) identified a total housing delivery target of 10,678 units over the plan period. This equates to an annual housing target of 562 units throughout the plan period.

3.3. The Town and Country Planning Regulations (2012) require that Authority Monitoring Reports outline progress against targets for the monitoring period (2021 – 2022). The 'LPSS' confirms that the Council's Objectively Assessed Need ('OAN') is 562 dwellings over the plan period (2015-2034).

#### Table 1: Previous Housing Completions

| Monitoring<br>Period | 2015/16 | 2016/17 | 2017/18 | 2018/19 | 2019/20 | 2020/21 | 2021/22 | Total |
|----------------------|---------|---------|---------|---------|---------|---------|---------|-------|
| Completions          | 387     | 294     | 299     | 351     | 352     | 609     | 459     | 2,751 |

\*This table is for the completion of C3 dwellings. It does not include any contribution from student accommodation that can be counted as part of the housing supply<sup>9</sup>. See section below for total completions figures incorporating student completions.

#### Housing for Students

3.4. The West Surrey SHMA Guildford addendum (2017) estimates the borough has a need for a maximum of 3,800 additional student bedspaces over the plan period (2015 – 2034). Within this figure, 2,090 students are assumed to live in student-halls on-campus, which leaves a need of approximately 428 additional off-campus C3 dwellings (or 23 dwellings per year) to accommodate the remaining 1,710 new students over the plan period. This figure rests on the assumption that there are circa four students per C3 household on average. The separately-identified student accommodation need for 428 C3 dwellings is included within the general housing need figures.

3.5. The Manor Park Masterplan for the University of Surrey (02/P/02505) shows 145,200 square metres of student and staff residential accommodation, which has capacity for approximately 4,171 bedspaces to be built. There has been one planning permission for Purpose Built Student Accommodation (PBSA) on-campus over the monitoring period at Manor Farmhouse, Manor Farm Cottages. It is worth noting that 479 bedspaces in PBSA at Manor Park were completed by September 2018 and another 669 completed by September 2019. On 20/05/2020 it was determined that prior approval was not required under

<sup>&</sup>lt;sup>9</sup> National Planning Practice Guidance, Paragraph: 034 Reference ID: 68-034-20190722

Schedule 2, Part 11, Class B of the Town and Country Planning (General Permitted Development) Order 2015 (as amended) for the demolition of four two-storey student halls of residence with 224 bedspaces on the University Stag Hill campus.

3.6. Table 2a (below) shows the planning permissions that have been granted during this monitoring period for purpose-built student accommodation. Further details can be viewed in Appendix 5 of the Land Availability Assessment (2022)<sup>10</sup>.

Table 2a: Planning permissions for purpose-built student accommodation 1 April 2021 to 31 March 2022

| Application<br>Reference | Date<br>Approved | Address                                    | Proposal   |
|--------------------------|------------------|--|--|
| 21/P/00618               | 16/11/21         | Manor Farmhouse,<br>Manor Farm<br>Cottages | On campus 6x 2 bed apartments, 2 x<br>studios staff/student accommodation, 7<br>bedroom (8 beds) student<br>accommodation. |

3.7. To calculate the equivalent number of C3 bedspaces we use the ratio of 1:1 for studio flats and each self-contained cluster flat (comprised of a number of bedspaces) is counted as 1 C3 unit. The ratios used are different for the Housing Flows Reconciliation completions. Table 2b below shows the student bedspace completions for this monitoring period, and the equivalent number of C3 bedspaces.

Table 2b: Completions of purpose-built student accommodation 1 April 2021 to 31 March 2022

| Application<br>Reference        | Site                 | Bedspaces                           | Equivalent C3<br>units |
|---------------------------------|----------------------|-------------------------------------|------------------------|
| 17/P/00509<br>and<br>19/P/00535 | Guildford<br>College | 533 (91 studios, 47 cluster flats)  | 138                    |
| 18/P/02226                      | Bishops Nissan       | 361 (102 studios, 37 cluster flats) | 139                    |
| -                               | -                    | -                                   | 277                    |

#### Total housing completions

3.8. The total housing completions figure for 2021/22 is 737 homes. This includes 459 C3 dwellings (see Table 1 above), along with 278 equivalent C3 units<sup>11</sup>.

3.9. Table 2c shows the total housing completions in the borough, including C3 equivalent units (comprised of purpose-built student accommodation and other forms of communal accommodation).

3.10. Note the overall level of completions for the year 2020/2021 has been amended to 861, from the previously published figure of 911. This is due to the way in which the coliving units at Kernel Court<sup>1</sup> should have been counted. Using the HDT Measurement

<sup>&</sup>lt;sup>10</sup> Available to view online at: https://www.guildford.gov.uk/localplan/housing.

<sup>&</sup>lt;sup>11</sup> The 278 units are composed of 277 equivalent C3 units from purpose-built student accommodation (see Table 2b) and 1 equivalent C3 unit from a residential institution / children's home (see Table 12)

Rulebook (2018), the provision of 113 co-living units is equivalent to the provision of 63 C3 dwellings (using the ratio of 1.8 for communal accommodation) and so the number of completions has been reduced by 50 (113 - 63 = 50).

| Monitoring<br>Period      | 2015/16 | 2016/17 | 2017/18 | 2018/19 | 2019/20 | 2020/21 | 2021/22 | Total |
|---------------------------|---------|---------|---------|---------|---------|---------|---------|-------|
| C3<br>Completions         | 387     | 294     | 299     | 351     | 352     | 609     | 459     | 2,751 |
| C3 equivalent completions | -       | -       | -       | -       | -       | 252     | 278     | 530   |
| Total<br>Completions      | 387     | 294     | 299     | 351     | 352     | 861     | 737     | 3,281 |

Table 2c: Total Previous Housing Completions (including C3 equivalent units)

#### Planning Permissions Granted for New Homes

3.11. The number of homes that have been granted planning permission this year is higher than the previous monitoring period. The last monitoring period did not benefit from any larger permissions, and comprised mainly smaller permissions. This monitoring period contains a few larger sites, with smaller sites that give the Borough the largest permissions granted figure during the Plan period to date. The largest application that was approved during this monitoring period was 20/P/02155: Weyside Urban Village, (Slyfield Regeneration Project), Slyfield Green, approved for 1550 net homes. This is a significantly bigger approval than the largest planning permission approval in the previous monitoring period (19/P/02197), which was for 154 net homes.

| Monitoring<br>Period | Number of new market homes granted permission (net) | Number of affordable homes granted permission (net) |
|----------------------|---|---|
| 2017 / 2018          | 1062  | 233   |
| 2018 / 2019          | 609   | 285   |
| 2019 / 2020          | 553   | 165   |
| 2020 / 2021          | 324   | 73  |
| 2021 / 2022          | 1,244   | 710   |

Table 3: New Homes Granted Permission in Guildford Borough Each Year<sup>12</sup>

\*This table reflects permission granted for C3 units, and does not include student accommodation that can count towards housing supply.

3.12. Table 4 (below) shows the proportion of new homes approved by site size. During the monitoring period, the largest percentage came from sites sized 200+, which made up 79% of the homes approved during the period.

<sup>&</sup>lt;sup>12</sup> These figures include permissions that have since expired.

|                                 | Proportion of new homes<br>approved per year <sup>13</sup> |               |                   |               |  |
|---------------------------------|--|---------------|-------------------|---------------|--|
| Site size (Net number of homes) | 2018/<br>2019  | 2019/<br>2020 | 2020/<br>2021     | 2021/<br>2022 |  |
| Less than 5                     | 11%  | 9%            | 17%               | 3%            |  |
| 6 – 15                          | 12%  | 7%            | 10%               | 3%            |  |
| 16 – 50                         | -  | 15%           | 14%               | 6%            |  |
| 51 – 200                        | 23%  | 69%           | 22%               | 9%            |  |
| 200+                            | 54%  | -             | 37% <sup>14</sup> | 79%           |  |

#### Table 4: Proportion of new homes approved by site size

\*This table reflects permission granted for C3 units, and does not include student accommodation that can count towards housing supply.

#### **Outstanding Capacity**

3.13. 'Outstanding capacity' refers to the number of new homes on sites with planning permission that have not yet been built. Information regarding outstanding capacity is covered within the Land Availability Assessment (2022) ('LAA'). The LAA (2022) was published in December 2022 and can be viewed at:

https://www.guildford.gov.uk/article/25375/Land-Availability-Assessment.

#### Five-Year Housing Land Supply

3.14. As at 1 April 2022, the Council has a Five-Year Housing Land Supply position of 6.46 years, as confirmed in the Land Availability Assessment (2022).

3.15. Detailed assessment of the Council's Five-Year Housing Land Supply is set out in the Five-Year Housing Land Supply document (5YHLS)<sup>15</sup>.

3.16. Briefly, section 4 of the LAA sets out the components of housing supply that are anticipated to be delivered within the first five-year period (namely, sites assessed as being 'deliverable'). This supply comprises a mixture of outstanding planning permissions and potential development sites as identified in the LAA at Appendix 2: Realistic Candidates for Development.

3.17. Table 5 (below) provides a breakdown of how the five-year housing supply has been calculated. Please refer to the LAA for detailed assessments of the various inputs.

<sup>&</sup>lt;sup>13</sup> This table reflects percentages based on site size rather than number of permissions granted.

<sup>&</sup>lt;sup>14</sup> Data for 2020/21 has been updated to correct an error in last years data, and to also bring 2020/21 in line with the site size calculation, rather than a permissions granted calculation.

<sup>&</sup>lt;sup>15</sup> Available online at: https://www.guildford.gov.uk/article/22879/Monitoring-the-Local-Plan.

Table 5: Five-Year Housing Land Supply Calculation

| Α | Housing requirement (2015 - 2034)  |              | 10,678 |
|---|--|--------------|--------|
| В | Annual requirement   | A / 19 =     | 562    |
| С | Completions required (1 April 2015 - 31 March 2022)                            | B * 4 =      | 3,934  |
| D | Completions delivered (1 April 2015 - 31 March 2022)                           |              | 3,281  |
| E | Accrued deficit (1 April 2015 - 31 March 2022)                                 | C - D =      | 653    |
| F | Deficit annualised over the remaining plan period to 2034 (Liverpool approach) | E / 12 =     | 54     |
| G | Annual housing requirement taking account of deficit                           | B + F =      | 616    |
| Н | Housing requirement (1 April 2022 - 31 March 2027)                             | G * 5 =      | 3,082  |
| 1 | Plus 5% buffer   | H * 1.05 =   | 3,236  |
| J | Housing supply (1 April 2022- 31 March 2027)                                   |              | 4,181  |
| K | Five-year housing land supply  | (J / I) *5 = | 6.46   |

Housing Delivery Test ('HDT')

3.18. The HDT is an annual measurement of housing delivery that is calculated from the number of homes delivered in a local authority over the last three years. This figure is compared to the number of homes that were expected to be built over the same period. More information on the HDT and how it is calculated is available at: <a href="https://www.gov.uk/government/collections/housing-delivery-test">https://www.gov.uk/government/collections/housing-delivery-test</a>

3.19. The Government published the Housing Delivery Test: 2021 measurement on 14 January 2022, and this comprises the most recent HDT result. The 2021 HDT measurement for GBC is 144% of its housing requirement (over the three previous years).

3.20. The NPPF indicates at paragraph 76, that in cases where housing delivery has fallen below 95% of the Local Planning Authority's housing requirement during the three-year period in question, it should prepare an action plan to assess the causes of under-delivery and identify actions to increase delivery in future years<sup>16</sup>.

| Year | Measurement |
|------|-------------|
| 2018 | 75%         |
| 2019 | 83%         |
| 2020 | 90%         |
| 2021 | 144%        |

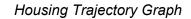
Table 6: Housing Delivery Test Results

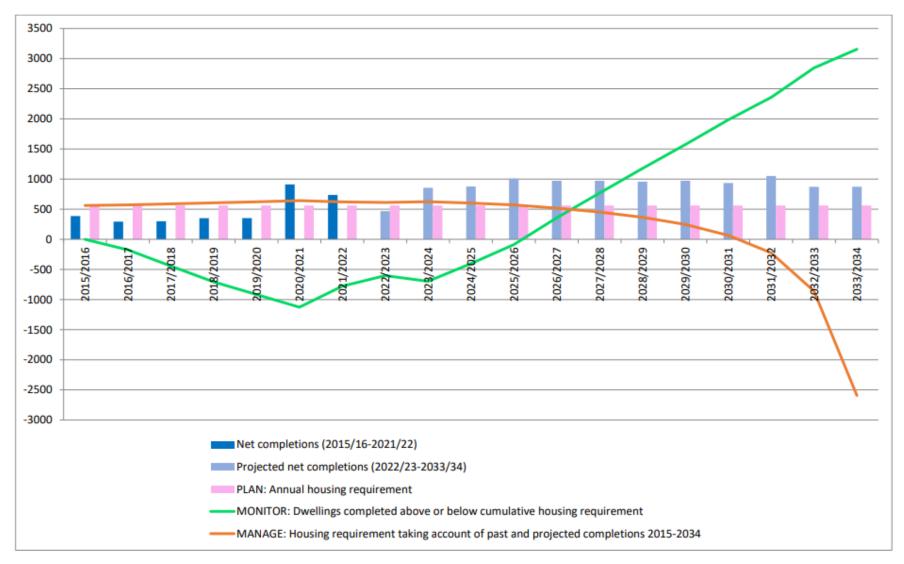
<sup>&</sup>lt;sup>16</sup> The Council's Housing Delivery Action Plan can be viewed online at: <u>https://www.guildford.gov.uk/article/22879/Monitoring-the-Local-Plan</u>

#### Housing Trajectory

3.21. The Five-Year Housing Land Supply document includes a Housing Trajectory illustrating the expected housing delivery over the next 15 years. This comprises sites that already have planning permission as well as potential development sites identified in the LAA that are expected to gain planning permission in the future.

3.22. The accompanying graph, extracted from that document, demonstrates the relationship that the anticipated housing delivery has with the borough's annual housing target. The green 'Monitor' line identifies the extent to which the anticipated housing delivery is above or below the cumulative housing requirement for the same period. This provides the cumulative deficit or surplus as at the beginning of each year, which would need to be taken account of in rolling forward the five-year land supply calculations. If the trend line is positive (above zero), housing delivery is ahead of target, if it is negative (below zero), then housing delivery is behind target.





#### Provision of Affordable Homes

3.23. Affordable housing includes social rented, affordable rented and intermediate housing, provided to specified eligible households whose needs are not met by the market. The NPPF provides further information on Affordable Housing at Annex 2<sup>17</sup>.

3.24. The West Surrey SHMA: Guildford Addendum (2017) identifies that there are 517 households per annum who require financial support to meet their housing needs<sup>18</sup>.

| <b>Monitoring Period</b> | Number of new affordable homes (gross) |
|--------------------------|--|
| 2013 / 2014              | 17                                     |
| 2014 / 2015              | 68                                     |
| 2015 / 2016              | 125                                    |
| 2016 / 2017              | 32                                     |
| 2017 / 2018              | 111                                    |
| 2018 / 2019              | 89                                     |
| 2019 / 2020              | 62                                     |
| 2020 / 2021              | 78                                     |
| 2021 / 2022              | 110                                    |

Table 7: Affordable homes completed in Guildford borough

#### Brownfield land development ratio

3.25. Historically, a majority of housing completions have been developed on brownfield land in Guildford. This is likely to be due to the highly constrained nature of the borough with regards to its Green Belt and AONB land designations, in combination with a number of protected natural habitats such as the Thames Basin Heaths Special Protection Area ('TBHSPA').

Table 8: Ratio of completions on brownfield or greenfield land

| Total       | Brownfield | Percentage (%) | Greenfield | Percentage (%) |
|-------------|------------|----------------|------------|----------------|
| Completions | Land       | of total       | Land       | of total       |
| 1,196       | 925        | 77%            | 271        | 23%            |

\*This table reflects both C3 and student accommodation completions that count towards housing supply

3.26. Table 8 illustrates that the majority of new homes delivered in the borough during this monitoring period has been on brownfield land. Application 18/P/02226: Bishops Nissan of Guildford contributed significantly to the number of brownfield land completions, providing 139 C3 units, and 361 student units in total during the monitoring period. For greenfield

<sup>&</sup>lt;sup>17</sup> The latest version of the NPPF is available online at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/1005759/NPPF\_Jul y\_2021.pdf

<sup>&</sup>lt;sup>18</sup> Available online at: https://www.guildford.gov.uk/newlocalplan/media/23816/West-Surrey-SHMA-Guildford-Addendum-Report-2017/pdf/West\_Surrey\_SHMA\_Guildford\_Addendum\_Report\_2017.pdf

land, application 17/P/02592: Land South of Ash Lodge Drive is still providing a high number of completions, totalling 124 during the monitoring period.

3.27. The ratio of development on brownfield land is likely to decrease throughout the plan period, particularly as a result of the site allocations as set out in the adopted Local Plan: Strategy and Sites (2015 – 2034), which allocates a number of strategic sites on greenfield land. However, opportunities for maximising brownfield land have been taken and the Local Plan does allocate a number of 'Previously Developed' sites, largely within the borough's urban areas, which will continue to be delivered throughout the plan period. Further Previously Developed Land ('PDL'), also known commonly as Brownfield Land, will continue to be identified for development through the Land Availability Assessment ('LAA') and the Brownfield Land Register.

#### Brownfield Land Register

3.28. Local Authorities are required to prepare, maintain and publish a Brownfield Land Register in accordance with the Town and Country Planning (Brownfield Land Register) Regulations 2017. The Register comprises a list of Previously Developed (Brownfield) sites that have the potential to accommodate residential development. This includes sites from various sources, including sites allocated in the Local Plan, whether they currently have planning permission or otherwise, provided they meet certain specified criteria.

3.29. Part 1 of the most recently published Brownfield Land Register was published on the 30<sup>th</sup> November 2022 (which is outside of the monitoring period). The register contained 72 brownfield sites, in which 51 are recognised as suitable, available and achievable for residential development under criteria 4 of the Town and Country Planning (Brownfield Land Register) Regulations 2017. The Brownfield Land Register is available on the Council's website at: https://www.guildford.gov.uk/planningpolicy/brownfield-land-register.

Type of new homes (net) granted planning permission (2021 / 2022)

| Type of Home | Number of new homes (gross) | Percentage of new homes (gross) |  |  |
|--------------|-----------------------------|---------------------------------|--|--|
| House 1156   |                             | 59%                             |  |  |
| Flat         | 182                         | 9%                              |  |  |
| Unspecified  | 627                         | 32%                             |  |  |

Table 9: Type of homes granted planning permission (Gross) (2021 / 2022)

3.30. The West Surrey SHMA (2015) reports the breakdown of need for the various different size homes within the borough to be as follows:

|                      | Affordable Housing | Market Housing |
|----------------------|--------------------|----------------|
| 1 Bed Properties     | 40%                | 10%            |
| 2 Bed Properties     | 30%                | 30%            |
| 3 Bed Properties     | 25%                | 40%            |
| 4 Bed Properties (+) | 5%                 | 20%            |

3.31. The SHMA (2015) indicates that one-bed properties are of greatest need for affordable housing, whereas three-bed properties are of greatest need for market housing.

Table 10 (below) identifies the mix of housing granted permission this monitoring year, which demonstrates that the need identified in the SHMA is currently only achieving the percentage aim for some bedroom sizes. However, the table does not represent the full granted applications for the year, as some units granted have yet to have a determined bedroom mix.

| Type of homes | Affordable Housing (%) (net) | Market Housing (%) (net) |
|---------------|------------------------------|--------------------------|
| One Bedroom   | 36%                          | 31%                      |
| Two Bedroom   | 28%                          | 22%                      |
| Three Bedroom | 35%                          | 29%                      |
| Four Bedroom+ | 1%                           | 18%                      |

| <b>T</b> 1 1 1 0 1 1 1 1 |                        |                        |     |
|--------------------------|------------------------|------------------------|-----|
| Table 10: Mix of housing | sizes granted planning | permission (2021 / 202 | 22) |
|                          |                        |                        |     |

\*This table reflects percentages based on the total number of homes where applicants have specified the bedroom mix, and does not include units from applications that have not specified the housing mix.

#### Affordable provision on qualifying sites

3.32. Policy H2 of the Guildford Local Plan Strategy and Sites seeks affordable housing provision on sites of 11 or more homes. The Council seeks 40% of the homes on site to be affordable.

3.33. During the monitoring period, 5 applications met the 11 dwelling threshold as set out in policy H2. Of the total 1761 units provided by the qualifying sites, 710 of these units were affordable. This equates to a total of marginally above 40% affordable units, which meets the target of 40%.

3.34. Table 11 (below) demonstrates qualifying sites where applications were approved during this monitoring period, and the total percentage of affordable units which were agreed. In previous tables, where the development has not met the 40% target, an explanation is provided as to why this was not achieved. However, during this monitoring period, all qualifying sites provided 40% affordable units on site.

| Application<br>Reference | Address   | Total<br>Units | Total<br>Affordable<br>Units | Affordable<br>Percentage | Justification   |
|--------------------------|---|----------------|------------------------------|--------------------------|---|
| 20/P/02067               | Manor Farm, East<br>Lane, West<br>Horsley,<br>Leatherhead, KT24<br>6HQ                            | 132            | 56                           | 42%                      | -   |
| 19/P/02191               | Oldlands, Burnt<br>Common Lane,<br>Ripley, Woking,<br>GU23 6HD                                    | 30             | 12                           | 40%                      | -   |
| 20/P/02155               | Weyside Urban<br>Village (Slyfield<br>Regeneration<br>Programme),<br>Slyfield Green,<br>Guildford | 1550           | 620                          | 40%                      | -   |
| 21/P/01569               | Former Westway<br>Car Park, Aldershot<br>Road, Guildford,<br>GU2 8YH                              | 37             | 15                           | 41%                      | -   |
| 20/P/00924               | Land at School<br>Lane, Worplesdon  | 12             | 7                            | 58%                      | Application<br>exceeds the<br>40%<br>requirement<br>as part of<br>demonstrating<br>'very special<br>circumstances<br>' for<br>development<br>in the Green<br>Belt |

Table 11: Percentage of affordable housing on qualifying sites (2021 / 2022)

#### The Loss of Homes

3.35. During the monitoring period, one planning permissions was granted which resulted in the net loss of a dwelling. This application was 21/P/01954: 34 Woodlands Road, Guildford, GU1 1RW, which was for a change of use from a C3 residential home to a C2 residential institution (children's home). This resulted in the net loss of one dwelling. The Council intends to increase housing delivery in the borough, which means that applications involving the net loss of homes are generally refused. The number of homes lost through permissions remains generally low.

#### Housing for Different Groups in the Community

#### Specialist housing for older people and people with disabilities

3.36. Housing for older people and people with disabilities may fall within any of the C2, C3 or Sui Generis land use classes. Land use class C2 (residential institutions) includes dwellings with an element of care, with residential care homes and nursing homes falling within this category. The NPPF<sup>19</sup> defines older people as over or approaching retirement age, including newly-retired through to the very frail elderly whose housing needs can encompass accessible, adaptable general needs housing through to retirement and specialised housing for those with support or care needs. Disabilities can include, but are not limited to, people with ambulatory difficulties, blindness, learning difficulties, autism and mental health needs, which may generate a range of housing requirements.

3.37. The West Surrey SHMA Guildford addendum (2017) excluded the borough's population in residential care from the general household projections for use class C3 housing and identified a separate need for 433 care home bed spaces between 2015 - 2034. Although there is no set target for C2 accommodation, the LPSS recognises the importance of, and need for, this type of accommodation in the borough. Importantly, the delivery of C2 accommodation now counts toward the council's housing supply in accordance with the Housing Delivery Test.

3.38. The West Surrey SHMA Guildford addendum Report (2017) identifies a need for 1,061 specialist homes for older persons between 2015 - 34. This forms part of our overall housing need for C3 use class housing.

3.39. Table 12 (below) shows the planning permissions for C2 use housing for older people, people with disabilities and children's homes that were approved in this monitoring period.

| Applicatio<br>n<br>Reference | Date<br>Approved | Address   | Proposal  | Bedspaces |
|------------------------------|------------------|---|---|-----------|
| 20/P/01291                   | 04/06/2021       | Ashley<br>House,<br>Christmas<br>Hill,<br>Shalford,<br>Guildford<br>GU4 8HN | Erection of a 60<br>bedspace care home<br>(use class C2) with<br>parking, access,<br>landscaping and<br>other associated<br>works following<br>demolition of the<br>existing structure.<br>(Amended plans on<br>01.02.21) | 60        |

| Table 12: Planning permissions for housing for older people and people with disabilities |
|--|
| 1 April 2021 to 31 March 2022  |

<sup>&</sup>lt;sup>19</sup>National Planning Policy Framework glossary: https://www.gov.uk/guidance/national-planning-policy-framework/annex-2-glossary

| 21/P/01954 | 21/12/2021 | 34<br>Woodlands<br>Road,<br>Guildford,<br>GU1 1RW | Change of use from<br>C3 (Dwellinghouse)<br>to C2 (Residential<br>Institutions<br>(children's home))<br>with 4 bedrooms. | 4 |
|------------|------------|---|--|---|
|------------|------------|---|--|---|

Housing for Students

3.40. Student accommodation is addressed within Section 3 'Monitoring Indicators' of this report.

#### Self-build and Custom House Build

3.41. The Self-Build and Custom Housebuilding Act (2015) requires that local authorities keep a register of individuals and associations interested in acquiring a serviced plot(s) of land within their administrative area for the purpose of building houses to occupy as a main residence. The Council meets this obligation and publicises the register via its website (www.guildford.gov.uk/selfbuild). Local authorities must have regard to the register when carrying out their Planning, Housing, Regeneration and Land Disposal functions.

3.42. To be placed on the register, applicants must be aged 18 years or older, a British Citizen, a citizen of a European Economic Area (EEA) country or national of Switzerland; they must be seeking to acquire a serviced plot of land in Guildford borough to build a house to occupy as their sole or main residence. In the case of associations, all individuals within the association must meet all of the criteria.

3.43. In addition to the statutory criteria listed above, additional eligibility criteria applies to Part 1 of the register. Applicants must have lived in the Borough for at least five years prior to their application, worked in full-time employment (greater than 16 hours per week) in the borough for at least three years and continue to do so, and have the financial ability to purchase land for their own self-build or custom housebuilding project.

3.44. Self-build and Custom Housebuilding Planning Practice Guidance requires relevant authorities to grant permission for enough suitable serviced plots of land to meet the demand for self-build and custom housebuilding in their area. The requirement is established by the number of entries on Part 1 of the authority's register during the base period, which runs from 31 October to 30 October annually. At the end of each base period, authorities have three years to grant permission for an equivalent number of plots of land for self-build and custom housebuilding. Planning Practice Guidance states relevant authorities are entitled to remove an individual or association of individuals from their register in a subsequent base period if they fail to pay any annual fee set by the authority to remain on the register.

3.45. The figures for each base period reflect the numbers on the Register after the Council's eligibility criteria were introduced in 2018. This is considered to reflect the most accurate representation of individuals who were in a position to build their own home in Guildford Borough and had the means to do so. The figures reported in this AMR in Table 13 below differ from those reported in previous monitoring periods. This is because the numbers withdrawing from the Register or not renewing their application are now reflected in a separate column and listed in subsequent base periods rather than showing the actual

base period that they were originally registered on and withdrew from. Please note that the AMR monitoring period differs from the Register monitoring period.

| Part 1 of Register<br>Base Period      | Number of<br>eligible applicants<br>registering per<br>base period | Those withdrawing<br>from Part 1 of the<br>Register <sup>20</sup> |
|--|--|---|
| BP1: 1 April 2016 – 30 October 2016    | 8  | -   |
| BP2: 31 October 2016 – 30 October 2017 | 4  | -   |
| BP3: 31 October 2017 – 30 October 2018 | 8  | -   |
| BP4: 31 October 2018 – 30 October 2019 | 8  | -   |
| BP5: 31 October 2019 – 30 October 2020 | 0  | 0   |
| BP6: 31 October 2020 – 30 October 2021 | 5  | 10 <sup>21</sup>  |
| Cumulative Total                       | 33   | 10  |

Table 13: Number of eligible applicants on Part 1 of the Self-build & Custom HousebuildingRegister

3.46. Table 14 below shows the number of people registering in each base period and the three-year time period for granting sufficient planning approvals. The number of self-build or custom build plots granted planning permission are listed and the cumulative shortfall or surplus of plots recorded.

| Table 14: Number of applicants on Part 1 of the Self-build & Custom Housebuilding  |
|--|
| Register and number of plots granted planning permission within three-year period. |

| Base Period and date range    | Number of<br>people<br>registering<br>per base<br>period | Three-year<br>period for<br>meeting<br>demand | Number of plots<br>granted planning<br>permission within<br>three-year period | Cumulative<br>shortfall/<br>surplus of plots |
|-------------------------------|--|---|---|--|
| BP1: 01/04/16 –<br>30/10/16   | 8  | 31/10/16 to<br>30/10/19                       | 722   | -1 shortfall<br>(7 – 8 = -1)                 |
| BP2: 31/10/16 –<br>30/10/17   | 4  | 31/10/17 to<br>30/10/20                       | 6 <sup>23</sup>   | 1 surplus<br>(6 - 4 -1)                      |
| BP3: 31/10/17 –<br>30/10/2018 | 8  | 31/10/18 to<br>30/10/21                       | 0   | -7 shortfall<br>(0 - 8 + 1)                  |
| BP4: 31/10/18 –<br>30/10/19   | 8  | 31/10/19 to<br>30/10/22                       | 7 <sup>24</sup> so far in AMR monitoring period                               |  |

<sup>&</sup>lt;sup>20</sup> https://www.gov.uk/guidance/self-build-and-custom-housebuilding#self-build-and-custom-housebuilding-registers: Relevant authorities are also entitled to remove an individual or association of individuals from their register in a subsequent base period if they fail to pay any annual fee set by the authority to remain on the register. Paragraph: 036 Reference ID: 57-036-20170728

<sup>&</sup>lt;sup>21</sup> 10 people withdrew or did not renew in 2019/2020. This is reflected in the subsequent base period 2020/2021.

<sup>&</sup>lt;sup>22</sup> Keens Lane planning ref: 18/P/01014 approved 7 plots 07/11/2018

<sup>&</sup>lt;sup>23</sup> Land rear of Chicane and Quintons, East Horsley planning ref: 19/P/01541(outline pp) & 21/P/02394(reserved matters) approved 5 plots 04/12/2019 and 7/9/2022 and The White House, East Horsley planning ref: 19/P/02153 approved 1 plot 11/3/2020.

3.47. A hybrid application including 7 self-build/custom build plots at Manor Farm, West Horsley was approved during the monitoring period (see Table 15 below).

3.48. An outline/hybrid planning application on Land at Garlicks Arch, Send Marsh/Burnt Common, Send (planning ref: 19/P/02223) was approved outside this monitoring period and will be reported in next year's AMR.

| Application<br>Reference | Date<br>Approved | Address   | Proposal  |
|--------------------------|------------------|---|---|
| 20/P/02067               | 16/2/2022        | Manor<br>Farm, East<br>Lane, West<br>Horsley,<br>KT24 6HQ | Hybrid application for a) Outline<br>planning application for 7 self-<br>build/custom build dwellings with<br>access from Long Reach and b) Full<br>planning application for the erection<br>of 132 dwellings |

Table 15: Permissions including self-build or custom housebuilding plots (2021-2022)

#### Traveller Accommodation

3.49. The Guildford Traveller Accommodation Assessment ('TAA') (2017)<sup>25</sup> sets out the expected need for traveller pitches and travelling showpeople plots over the Local Plan period. Policy S2 of the Local Plan: Strategy and Sites (LPSS) (2019) reflects the identified need from the TAA (2017) and makes provision within the borough for 4 Gypsy and Traveller pitches and 4 Travelling Showpeople plots to meet the accommodation needs for travellers (as defined by Planning Policy for Traveller Sites (PPTS) August 2015) between 2017 and 2034.

3.50. The Council is not required to set targets to meet the needs of Gypsies, Travellers and Travelling Showpeople who do not meet the planning definition. However, the Council recognise from the findings of the TAA (2017) that there is an additional need for 41 permanent pitches for Gypsies and Travellers and 4 permanent plots for Travelling Showpeople who do not meet the PPTS planning definition of traveller. There is also a likely need for 8 permanent pitches for Gypsies and Travellers and Travellers to meet potential additional accommodation needs of households of unknown planning status. These accommodation needs are reflected in LPSS Policy S2.

3.51. No planning applications for traveller pitches were approved during the monitoring period.

#### Five-year traveller accommodation supply

3.52. The Council has met its five-Year Gypsy and Traveller pitch requirement, which is summarised in Table 16 below. Whilst LPSS Policy S2 sets a target over the period 2017 to 2034, the TAA breaks this target down into shorter time periods. The TAA requirement for

<sup>&</sup>lt;sup>24</sup> Manor Farm, Horsley planning ref: 20/P/02067 approved 7 plots 16/2/2022

<sup>&</sup>lt;sup>25</sup> Available online at: https://www.guildford.gov.uk/localplan/housing.

travellers meeting the PPTS planning definition is 2 pitches to 31 March 2022 and 1 pitch between 2022 to 2027; 24 pitches have been granted planning permission and 18 pitches have been delivered since 2017 (one was granted permission pre-2017).

3.53. The provision of pitches and plots over and above our target (for PPTS travellers) contributes towards meeting the accommodation needs for 8 pitches for households who are of unknown traveller status and the 41 pitches and 4 plots for households who do not meet the PPTS definition of a traveller.

3.54. For provision in the next five years there are 9 pitches with outstanding extant planning permission and 2 pitches without planning permission but on a Local Plan allocated site where the landowner anticipates completing the development by March 2026. Outside of this monitoring period, outline planning permission has been granted for 6 pitches at Weyside Urban Village, and this will be reported in the next AMR.

3.55. For Travelling Showpeople the TAA requirement is 3 plots up to 31 March 2022 and no plots between 2022 to 2027; no plots have been delivered. However, a hybrid (part full/part outline) planning permission that includes six Travelling Showpeople plots on land at Garlicks Arch, Send (planning reference 19/P/02223) was approved outside this monitoring period and will be reported in the next AMR.

Table 16: Traveller pitch and plot target from the Traveller Accommodation Assessment(TAA) time periods and number of pitches/plots approved.

|                       | Traveller Pitches                           |  |   | Travelling Showpeople Plots                |  |   |
|-----------------------|---|--|---|--|--|---|
| TAA<br>Time<br>period | TAA<br>PPTS<br>traveller<br>pitch<br>target | Pitches<br>approved<br>(for all<br>travellers) | Pitches<br>completed<br>or<br>deliverable   | TAA<br>PPTS<br>traveller<br>plot<br>target | Plots<br>approved<br>(for all<br>travelling<br>showpeople) | Plots<br>completed<br>or<br>deliverable |
| 27/1/17–<br>31/03/22  | 2<br>pitches                                | 24 pitches                                     | 18 <sup>26</sup><br>pitches<br>completed  | 3 plots                                    | 0 plots  | 0 plots                                 |
| 1/4/22 –<br>31/03/27  | 1 pitch                                     | 0 pitches<br>approved to<br>date               | 9 <sup>27</sup> pitches<br>outstanding<br>and 2 <sup>28</sup><br>pitches<br>deliverable | 0 plots                                    | 6 plots<br>approved to<br>date                             | 6 plots<br>deliverable                  |

3.56. It is worth noting that on 31 October 2022 the Court of appeal ruled in favour of Lisa Smith, the Appellant versus the Secretary of State for Levelling Up, Housing and Communities and North West Leicestershire District Council. The Court of Appeal found that excluding Ms Smith from the PPTS 2015 definition of a Gypsy and Traveller on the grounds that her family had ceased to travel for economic purposes due to her family's significant health and social needs was discriminatory.

3.57. The Judge concluded that the consequences of this outcome for future decision making on planning applications and appeals in which the relevant exclusion is engaged will depend on the particular circumstances of the case in hand. It will be for the decision-maker to assess what weight should be given, as material considerations, to the relevant exclusion and to such justification for its discriminatory effect. The result of that process of decision-making will emerge from the facts and circumstances of the individual case.

3.58. The Council have planned to meet all traveller's accommodation needs regardless of their status in PPTS terms. However, in terms of reporting we have focussed on the target set out in Policy S2 of the LPSS for travellers meeting the PPTS definition.

3.59. The Council's Land Availability Assessment ('LAA') (2021) includes within Appendix 6 an assessment of land available for traveller accommodation. It sets out the components of traveller accommodation supply for the first five-year period (namely, sites assessed as being 'deliverable'). This supply comprises a mixture of outstanding planning permissions, site allocations and sites identified in the LAA. The LAA also identifies sufficient potential land to meet the need for traveller accommodation over the plan period (2015 – 2034).

<sup>&</sup>lt;sup>26</sup> Out of 24 pitches granted planning permission within this period, 18 were completed.

<sup>27</sup> Nine pitches have planning permission but have not been delivered: 5 pitches at Four Acre Stables, 2 pitches at Valley Park and 2 pitches with extant planning permission that pre-dates 27/1/17.

<sup>&</sup>lt;sup>28</sup> Two pitches at Winds Ridge are on a Local Plan allocated site which does not have planning permission. The landowner anticipates completing the development by March 2026.

# 4. Employment and Retail

### **Employment Floorspace**

Figure 1: Net\* sqm change in employment (Class E(g)) floorspace unimplemented<sup>29</sup>, under construction and completed, 1 April 2021 to 31 March 2022 (Borough-wide)

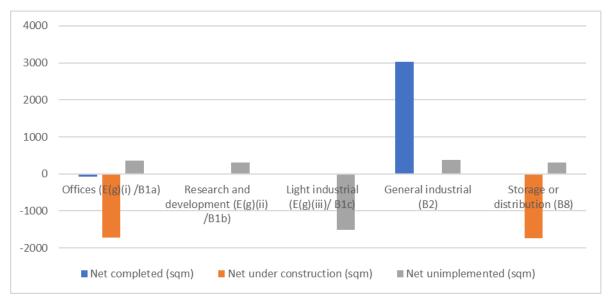


Table 17: Net completions and commencements for employment use classes (1 April 2021 to 31 March 2022)

| Use class                                   | Net completed<br>(sqm) | Net under<br>construction (sqm) | Net un-<br>implemented |  |  |
|---|------------------------|---------------------------------|------------------------|--|--|
| Offices (E(g)(i) /B1a)                      | -68                    | -1,727                          | 359                    |  |  |
| Research and development<br>(E(g)(ii) /B1b) | 0                      | 0                               | 300                    |  |  |
| Light industrial (E(g)(iii)/ B1c)           | 0                      | 0                               | -1,509                 |  |  |
| General industrial (B2)                     | 3034                   | 0                               | 374                    |  |  |
| Storage or distribution (B8)                | 0                      | -1,733                          | 300                    |  |  |
| Total                                       | 2966                   | -3,460                          | -176                   |  |  |

\* Please note these figures are overall net sums for each use class. Within each total, there are gains and losses of floor space from individual sites

4.1. Figure 1 and Table 17 above show the total net change (total gains and losses) of employment floorspace arising from approved planning applications that was either completed, under construction, or unimplemented, as of 31st March 2022. Unimplemented floorspace refers to a floorspace gain or loss that had been granted planning permission but

<sup>&</sup>lt;sup>29</sup> Unimplemented floorspace refers to developments that had been granted planning permission but where the proposed development had not yet commenced at the end of the annual monitoring period.

where the proposed development had not commenced at the end of the annual monitoring period (1 April 2021 to 31 March 2022).

### Employment floorspace completed

4.2. Employment floorspace completed during the 2021/22 monitoring period resulted in an overall net loss of 68 sqm of office (class E(g)(i)) floorspace. This arose from two schemes. The first was the reconfiguration and extension of Crossweys House, 28-30 High Street, Guildford by an additional 269 sqm. The second involved a loss of 337 sqm of office floorspace through change of use, via prior approval, of the Clifford James building in High Street, Ripley (opposite the Old Vicarage), to a four-bed apartment scheme.

4.3. A significant total net gain of 3,034 sqm of Class B2 general industrial floorspace was completed, all of which arose from the redevelopment of part of Midleton Industrial Estate to provide 15 modern new units following demolition of plots 12-15. The pre-existing unit 12 Midleton Industrial Estate had been occupied by AirHop, an indoor trampoline park (class E(d), previously D2), whose application to relocate to unit 10 (Lexicon House) was approved in October 2020.

### Employment floorspace under construction

#### Employment floorspace under construction

4.4. A total loss of 1,727 sqm office floorspace was under construction at the end of the monitoring period. This arose from three approved schemes: the first two involved a net gain of office floorspace. 667sqm of this was from office space proposed as part of redevelopment of Guildford Boat House, Millbrook, and 1600 sqm from the proposed refurbishment and two-storey extension of an existing office building at 255 High Street, Guildford.

4.5. The third scheme was the redevelopment of Liongate House, Ladymead, under two prior approval applications<sup>30</sup>, into a total of 94 1- and 2-bedroom flats. This started in March 2021 and was still under construction at the end of the 2021/22 monitoring period. Liongate House is a late 1980s building that comprised approximately 4,000 sqm (43,000 sq ft) office space, owned by Guildford Borough Council before being sold for residential use.

#### Unimplemented schemes involving loss or gain of employment floorspace

4.6. Approved planning applications proposing a change in employment floorspace that remained unimplemented at the end of the 2021-22 monitoring period (pipeline schemes) included a total net gain of 359 sqm of office (class E(g)(i)) floorspace. Within this net total, the floorspace gains arose from a proposed redevelopment and extension of Unit 4 Guildford Business Park, to create 11,550 sqm of Grade A office accommodation (net gain of just under 2,400 sqm), with a gym and other ancillary buildings. They also included the change of use of the former Jaguar Land Rover Garage, in Astolat Way, Peasmarsh from a car showroom, workshop and MOT test centre to a flexible use under Classes B1 (a, b and

<sup>&</sup>lt;sup>30</sup> See applications 20/W/00021 and 20/W/00022.

c) (now Class E(g), B2 and B8<sup>31</sup>. This resulted in a net gain of 1498 sqm employment space, spread across all these use classes<sup>32</sup>.

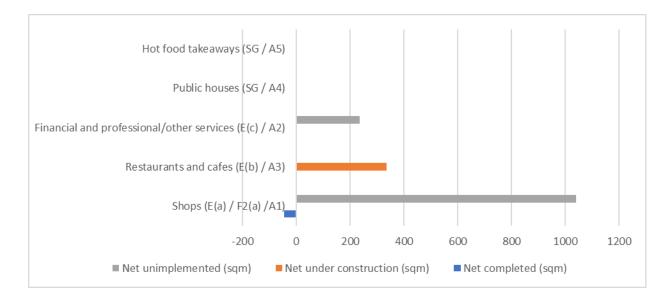
4.7. Some of the other schemes that made up the net total unimplemented gains figure for office floorspace were an application to redevelop Lantern House, Walnut Tree Close, Guildford, under prior approval to 21 residential flats (net loss of 1872 sqm), a planning application to convert 500 sqm office space within Diocesan House, Quarry Street, Guildford, to three flats, and a planning application to erect a new 316 sqm office on the site of 32 London Road, Guildford.

4.8. There were proposed unimplemented net gains of 300 sqm E(g)(ii) research and development, 374 sqm B2 general industrial, and 300 sqm B8 storage and distribution floorspace at the end of the monitoring period. These figures came from the proposed change of use of the Jaguar Land Rover site (see above), resulting in floorspace gains across all these use classes, and a small increase in B2 space from the proposed redevelopment of 11 Midleton Industrial Estate into a new subdivided light industrial unit.

4.9. A total net loss of 1,509 sqm E(g)liii) light industrial floorspace remained unimplemented. This was set to arise from several schemes, including an outline planning application for 28 dwellings at the Elms Centre, Glaziers Lane (-1500 sqm), the application for the Jaguar Land Rover site (+ 300 sqm, see above), and the change of use approved in November 2020 of a horological workshop at 204 Worplesdon Road to a single dwelling (- 219 sqm).

# **Retail floorspace**

*Figure 2: Net\* sqm retail (Class A) floorspace granted planning permission, under construction and completed, 1 April 2021 to 31 March 2022 (Borough-wide)* 



<sup>&</sup>lt;sup>31</sup>See application ref. 20/P/00567.

 $<sup>^{32}</sup>$  For annual monitoring purposes the 1498 sqm floorspace gain from this application was divided equally between the new approved use classes, i.e. B1(a, b, c) (E(g)(I,ii, iiii)), B2 and B8.

| Use class                                       | Net<br>completed<br>(sqm) | Net under<br>construction (sqm) | Net<br>unimplemented<br>(sqm) |
|---|---------------------------|---------------------------------|-------------------------------|
| Shops (E(a) / A1)                               | -45                       | 0                               | 1,040                         |
| Financial and professional services (E(c) / A2) | 0                         | 335                             | 0                             |
| Restaurants and cafes (E(b) / A3)               | 0                         | 0                               | 236                           |
| Drinking establishments (sui generis / A3)      | 0                         | 0                               | 0                             |
| Hot food takeaway (sui generis<br>/ A5)         | 0                         | 0                               | 0                             |
| Total   | -45                       | 335                             | 1,276                         |

Table 18: Net change in retail (Class E(a)) floorspace, 1 April 2021 to 31 March 2022 (Borough-wide)

\*Please note these figures are the overall net sums of gains and losses for each use class. Within each total, there are gains and losses of floor space from individual sites.

4.10. Figure 2 shows permitted gains and losses of floorspace in use as shops, financial and professional services, restaurants and cafes, drinking establishments and hot food takeaways across the Borough during the monitoring period (1 April 2021 to 31 March 2022).

4.11. Use Classes A1, A2 and A3 were revoked from 1 September 2020 and replaced by the new Class E (a, b, c). The old use classes have been shown after the new ones in the table above for ease of reference as the date the applications were submitted affected how they were determined. For planning applications submitted from 1 September 2020, Class A1/2/3 uses are treated as Class E and Class A4/5 uses are treated as sui generis. For applications for prior approval, the previous class A uses were used until the end of July  $2021^{33}$ .

#### **Retail Floorspace Completed**

4.12. There was a small (45 sqm) net loss of use class E(a) shop floorspace during the 2021/22 monitoring year, resulting from change of use of a dry cleaner to a mixed-use restaurant and hot food takeaway. This application was on a site within the designated Burpham local shopping centre although the officer assessing the proposal considered it unlikely to result in adverse impacts on amenity, or the centre's character, vitality, and viability.

#### Retail floorspace under construction

4.13. Retail floorspace recorded as under construction at the end of the 2020/21 monitoring period included a proposed café (use class E(b), comprising 45 sqm), as part of

<sup>&</sup>lt;sup>33</sup>See https://www.planningportal.co.uk/info/200130/common\_projects/9/change\_of\_use for more details of the new use classes and the transitional arrangements for determining applications.

the redevelopment of Guildford Boat House, Millbrook, and 290 sqm of E(a), E(b) or E(c) floorspace<sup>34</sup> from the refurbishment and two-storey extension of an existing office building at 255 High Street, Guildford.

#### Unimplemented schemes involving loss or gain of retail floorspace

4.14. Approved schemes for which construction had not yet started at the end of the monitoring period involved a total net gain of 1,040 sqm use class E(a) shop floorspace. This arose from three proposed schemes, the largest of which involved a gain of over 630 sqm, from the redevelopment of a betting shop (sui generis) to a retail use to form part of the existing Premier convenience store at 270-274 Southway, Westborough (Park Barn Parade).

4.15. The only other unimplemented scheme that involved a gain or loss of retail floorspace was the proposed change of use of a motorcycle dealership (Portman Motorcycles), a sui generis use, at 23-25 Woodbridge Hill, Stoughton (in Woodbridge Hill local shopping centre), to a restaurant/hot food takeaway. This was recorded as a net gain of 236 sqm in use class E(b).

#### **Retail floorspace surveys**

4.16. The Council undertakes regular surveys of ground floor commercial units in the Town Centre Primary Shopping Area (PSA) and the Borough's district and local shopping centres, usually on an annual basis. For consistency of results these surveys normally take place around May each year. The latest surveys were undertaken in March 2022 and the results of these are presented and commented on below, alongside data for previous years from 2015 onwards<sup>35</sup>.

<sup>&</sup>lt;sup>34</sup> For monitoring purposes, this was recorded as a gain of E(b) floorspace.

<sup>&</sup>lt;sup>35</sup> See https://www.guildford.gov.uk/article/22879/Monitoring-the-Local-Plan for previous years' Authority Monitoring Reports.

| Use class                                  | 2015 | 2016 | 2017 | 2019 | 2022 |
|--|------|------|------|------|------|
| E(a) (A1)                                  | 252  | 269  | 263  | 261  | 265  |
| E(c) (A2)                                  | 27   | 28   | 26   | 29   | 26   |
| E(b) (A3)                                  | 38   | 38   | 39   | 39   | 48   |
| E(g)(i) (B1)                               | 6    | 5    | 5    | 9    | 5    |
| C1   | 1    | 1    | 1    | 1    | 1    |
| C3   | 4    | 4    | 4    | 6    | 7    |
| D1   | 7    | 7    | 7    | 8    | N/a  |
| E(d) (D2)                                  | 1    | 1    | 0    | 0    | 2    |
| E(e)                                       | N/a  | N/a  | N/a  | N/a  | 7    |
| F.1(a)                                     | N/a  | N/a  | N/a  | N/a  | 1    |
| F.1(b)                                     | N/a  | N/a  | N/a  | N/a  | 1    |
| F.1(e)                                     | N/a  | N/a  | N/a  | N/a  | 1    |
| F.2(b)                                     | N/a  | N/a  | N/a  | N/a  | 1    |
| Sui generis – Drinking establishments (A4) | 8    | 9    | 8    | 7    | 8    |
| Sui generis – Hot food takeaways (A5)      | 11   | 11   | 11   | 10   | 4    |
| Sui Generis - other                        | 3    | 4    | 4    | 7    | 8    |
| Vacant                                     | 40   | 22   | 27   | 27   | 60   |
| Not surveyed                               | 12   | 11   | 14   | 4    | 1    |
| Total (not including units not surveyed)   | 398  | 399  | 395  | 404  | 445* |

Table 19: Breakdown and total of use classes in the Town Centre PSA, 2015-2022 <sup>36</sup>

\* Tunsgate Quarter (formerly Shopping Centre) was excluded from the surveys in 2015-2019 as many of the units in these areas were vacant throughout this period due to planned or ongoing redevelopment. It was included in the March 2022 survey as its redevelopment was complete by then.

Table 20: Number and percentage of Use Class E(a), E(b), and vacant commercial ground floor units in the PSA, 2015-2022 (out of all surveyed commercial ground floor units)

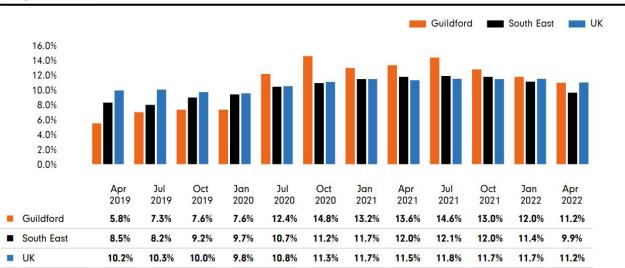
| Use class                           | May<br>2015        | May<br>2016    | May<br>2017    | May<br>2019        | Jul<br>2020 | May<br>2021 | March<br>2022      |
|-------------------------------------|--------------------|----------------|----------------|--------------------|-------------|-------------|--------------------|
| E(a) (A1) (%)                       | 252<br>(63.3%<br>) | 269<br>(67.4%) | 263<br>(66.6%) | 261<br>(64.6%<br>) | **          | **          | 265<br>(59.5%<br>) |
| Restaurants/cafes (E(b) (A3)<br>(%) | 38<br>(9.5%)       | 38 (9.5%)      | 39 (9.9%)      | 39<br>(9.7%)       | **          | **          | 48<br>(10.8%<br>)  |
| Vacant (%)                          | 40<br>(10%)        | 22 (5.5%)      | 27 (6.8%)      | 27<br>(6.7%)       | 12.4<br>%   | 14.7<br>%   | 60<br>(13.5%<br>)  |

<sup>&</sup>lt;sup>36</sup> Note – the use classes in place prior to the September 2020 amendment to the Use Classes Order are shown in brackets after the current use classes where applicable in Tables 19 and 20. N/a in Table 19 indicates where a use class was introduced or replaced by this amendment.

Note: The national town centre vacancy rate was 11.2% in April 2022 Source: BRC-Springboard data \*Data from Experience Guildford \*\* No comparative data available

4.17. Tables 19 and 20 above indicate more than double the proportion of vacant units across the PSA in March 2022 than in May 2019 (13.5% compared to 6.7%). This was an anticipated impact of the Covid-19 pandemic as shops have struggled to maintain the same level of trade and is consistent with quarterly vacancy data provided by the Business Improvement District (BID), Experience Guildford, as reported on in the 2020-21 AMR.

*Figure 3: Vacancy rate for Guildford town centre and average town centre vacancies for the South East and the UK. April 2019 to April 2022<sup>37</sup>.* 



Long term trend

4.18. Figure 3 above shows the long-term trend in vacancies for Guildford compared to the South East and the UK, based on these quarterly surveys. Alongside Table 20 it indicates that Guildford's vacancy rate has fallen steadily since the peak of the pandemic, from a high of 14.7% (in the PSA in May 2021) or 14.6% (in July 2021 across the survey boundary used for the quarterly BID surveys<sup>38</sup>). The quarterly data shown in Figure 3 illustrates that the national vacancy rate fell at a slower rate in the same period than that of Guildford town centre, from 11.5% in April 2021 to 11.2% in April 2022, and that Guildford's vacancy rate in April 2022 stood level with the national average at 11.2%.

4.19. This is a positive sign for Guildford's retail economy and a sign of lessened risk from the pandemic having led to a more conducive trading environment for businesses. The data shows that Guildford's town centre vacancy rate had remained slightly above that of the rest of the UK throughout the worst months of the pandemic, whereas pre-pandemic, it had been consistently a few percentage points below the national average.

<sup>&</sup>lt;sup>37</sup> Source: Experience Guildford/Springboard

<sup>&</sup>lt;sup>38</sup> The BID uses a larger area for quarterly surveys than the PSA boundary used for the Council's annual retail surveys, which may account for the slight difference in the vacancy rates reported.

4.20. The proportion of class E(a) retail units fell slightly since May 2019 (pre-pandemic), as it had at each survey since 2016. The proportion of restaurants and cafes (class E(b) uses) increased slightly between May 2019 and March 2022 (from 9.7% to 10.8%), whilst the percentage of hot food takeaways (sui generis) fell from 2.5% to 0.9%.

4.21. The reason for the slightly increased representation of restaurants and cafes may be partly due to the September 2020 amendment to the Use Classes Order, which permitted change of use between shops and restaurants, both of which now fall within Use Class E. However, it may also indicate that some restaurant and cafes have been able to take advantage of the increased shift to online retail during the Covid peak by continuing to provide a personal service and experience that cannot be as easily replicated online.

|                   | May 2019  | March 2022 | Vacant gain (+) or loss (-) |
|-------------------|-----------|------------|-----------------------------|
| Total in PSA      | 27 (6.0%) | 60 (13.5%) | 34                          |
| High Street       | 5 (3.8%)  | 27 (20.3%) | 22                          |
| The Shambles      | 3         | 2          | -1                          |
| Chapel Street     | 1         | 0          | -1                          |
| Tunsgate Quarter  | 2         | 3          | 1                           |
| Milkhouse Gate    | 0         | 1          | 1                           |
| Chertsey Street   | 0         | 1          | 1                           |
| North Street      | 7         | 6          | -1                          |
| Jeffries Passage  | 0         | 3          | 3                           |
| Market Street     | 0         | 3          | 3                           |
| Swan Lane         | 2         | 1          | -1                          |
| White Lion Walk   | 1 (4.8%)  | 8 (38%)    | 7                           |
| Friary Street     | 1         | 0          | -1                          |
| Phoenix Court     | 0         | 1          | 1                           |
| The Friary Centre | 4         | 4          | 0                           |

Table 21: Total vacancies in Town Centre PSA in May 2019 and May 2022

4.22. From Table 21 (above), most of the change in vacancies arising in the Town Centre PSA between May 2019 and March 2022 were from increases in the High Street and in White Lion Walk, with other streets displaying very little change. The steep increase from 1 to 7 vacant units in White Lion Walk (which the Policies Map designates as secondary frontage) may have artificially skewed the vacancy rate for the PSA upwards, bearing in mind that most of the vacancies in this centre are likely to be temporary and necessary to permit work on shopfronts to take place as part of the refurbishment of the centre which was approved under planning application reference 21/P00573. This development should not result in the loss of any ground floor retail units, however on the first floor the Next department store which has now been demolished will be replaced with offices<sup>39</sup>.

<sup>&</sup>lt;sup>39</sup> See https://www.experienceguildford.com/redevco-announces-8million-refurbishment-of-white-lion-walk-in-guildfordoffering-a-new-destination-for-the-town/ for more information on the approved refurbishment.

Table 22: Previous use class of units recorded as vacant in May 2022 at time of May 2019survey - for High Street, White Lion Walk and whole of PSA

| Use Class       | <b>A1</b> | <b>A2</b> | <b>A3</b> | <b>A4</b> | <b>A5</b> | B1(a) | <b>D1</b> | Sui Generis | Vacant |
|-----------------|-----------|-----------|-----------|-----------|-----------|-------|-----------|-------------|--------|
| Ligh Street     | 16        | 4         | 1         | 0         | 1         | 1     |           | 1           | 2*     |
| High Street     | 16        | 4         | I         | 0         | I         |       | -         |             | 3*     |
| White Lion Walk | 7         | 0         | 0         | 0         | 0         | 0     | 0         | 0           | 1*     |
|                 |           |           |           |           |           |       |           |             |        |
| PSA             | 34        | 5         | 4         | 0         | 1         | 2     | 1         | 1           | 12     |

\*The permitted use of all these vacant units in May 2017 was A1 (now E(a)).

4.23. Table 22 (above) shows the previous use of units recorded as vacant in March 2022 in the High Street, White Lion Walk and across the PSA. The majority (34) of these units were occupied Class A1 (now Use Class E(a)) shops, whereas a mere 12 out of the 60 units that were vacant in March 2022 were vacant at the time of the 2019 survey. Whilst there is limited evidence at present of a shift towards and/or resurgence in consumer demand for food and drink convenience retail outlets, the obvious increase in the proportion of vacant class E(a) shop units compared to other types of commercial unit is very likely to be symptomatic of the wider ongoing shift in consumer behaviour towards use of home delivery services particularly to replace visits to the larger comparison retail outlets that has accelerated nationally since the start of the Covid-19 pandemic.

4.24. This trend towards increased use of the internet to make comparison retail purchases at the expense of in-store shopping has been widely documented; however, research published by Lambert Smith Hampton<sup>40</sup> indicates signs of the trend in reverse, as the online share of total retail sales dropped to a two-year low of 25.9% in May 2022 (comparing favourably to about 37% two years earlier, albeit still higher than the pre-Covid peak of 21.6% recorded in November 2019). It also appears to have been reflected in the reduced number of vacant units across the town centre PSA compared to two years ago, and in greatly increased footfall. Footfall In Guildford town centre increased by 234% between May 2020 and May 2021, and then again by 9% between May 2021 and May 2022<sup>41</sup>.

<sup>&</sup>lt;sup>40</sup> Lambert Smith Hampton, Shopping Centre Futures, 2022: https://www.lsh.co.uk/-

<sup>/</sup>media/files/lsh/research/2022/lsh%20\_shopping%20centres%20-%20final

<sup>&</sup>lt;sup>41</sup> Springboard: May 2022 Footfall Report for Guildford

#### Retail floorspace under construction

#### Employment floorspace under construction

| Table 23: Total and % of occupied and vacant non-residential units in district centres |
|--|
| (March 2022)   |

| Use Class  | Wharf<br>Road,<br>Ash | %    | Station Parade,<br>E Horsley | %    | Ripley | %    |
|--|-----------------------|------|------------------------------|------|--------|------|
| Shops - E(a)   | 13                    | 46.4 | 14                           | 46.7 | 12     | 30.8 |
| Restaurants and cafes - E(b)                         | 3                     | 10.7 | 4                            | 13.3 | 4      | 10.3 |
| Financial/profess<br>ional/ other<br>services - E(c) | 8                     | 28.6 | 10                           | 33.3 | 10     | 25.6 |
| Medical/health<br>services - E(e)                    | 0                     | 0.0  | 0                            | 0.0  | 1      | 2.6  |
| Offices - E(g)(i)                                    | 0                     | 0.0  | 0                            | 0.0  | 0      | 0.0  |
| Public library -<br>F1(d)                            | 0                     | 0.0  | 1                            | 3.3  | 0      | 0.0  |
| Sui generis –<br>Pubs                                | 0                     | 0.0  | 0                            | 0.0  | 4      | 10.3 |
| Sui generis – Hot<br>food takeaways                  | 0                     | 0.0  | 0                            | 0.0  | 1      | 2.6  |
| Sui generis (not inc. pubs/HFT)                      | 4                     | 14.3 | 1                            | 3.3  | 2      | 5.1  |
| Vacant*  | 0                     | 0.0  | 0                            | 0.0  | 5      | 12.8 |
| Residential - C3                                     | 3                     | -    | 0                            | -    | 24     | -    |
| Total not inc. residential                           | 28                    | 100  | 30                           | 100  | 39     | 100  |

\*Note: The national town centre vacancy rate was 11.2% in April 2022. Source: BRC-Springboard data

4.25. Table 23 (above) shows the total number and percentage of all occupied and vacant non-residential uses, and the number of residential units, in the borough's district centres as of March 2022. Due to the Covid-19 pandemic 2021/22 was the first monitoring year in which it had been possible to undertake a full survey on foot of the district and local centres since May 2019. There were however few changes of use since the previous survey. The proportion of occupied shops (class E(a) had reduced in Ash and East Horsley district centres, however as there were no vacancies in either of these centres this would have been due to the reclassification of the former use class A1 into Class E as service uses are now covered under Class E(c).

4.26. The percentage of vacant units in Ripley district centre (12.8%) was substantially higher in March 2022 than in May 2019 when it was 3.2%, although it represents an increase of only three units, from 2 to 5. The rise in the percentage was mainly the result of

residential uses having been removed from the calculation of the vacancy rate for district and local centres this year to make these figures more accurate. The vacancy rate for Ripley is now slightly above the national average of 11.2%<sup>42</sup>.

4.27. There were zero vacancies in both Ash and East Horsley centres in March 2022. This reflected a fall in vacancies for East Horsley which was 3.2% in the previous two surveys in May 2017 and May 2019.

#### Local Centres

Table 24: Percentage of occupied Class *E*(a) and vacant units in local centres as of March 2022

| Local centre                   | E(a) %   | Vacant (%) |
|--------------------------------|----------|------------|
| Aldershot Road<br>Westborough  | E(a) (%) | Vacant (%) |
| Ash Vale                       | 60.0     | 0.0        |
| Stoughton Road,<br>Bellfields  | 21.4     | 7.1        |
| Bishopsmead Parade             | 40.0     | 0.0        |
| Collingwood Crescent           | 38.5     | 0.0        |
| Effingham                      | 85.7     | 0.0        |
| Epsom Road, Merrow             | 83.3     | 0.0        |
| Fairlands                      | 41.2     | 0.0        |
| Jacobs Well                    | 77.8     | 0.0        |
| Kingfisher Drive,<br>Merrow    | 40.0     | 0.0        |
| Kingpost Parade,<br>Burpham    | 50.0     | 0.0        |
| Madrid Road, Guildford<br>Park | 47.1     | 0.0        |
| Send                           | 25.0     | 5.0        |
| Shalford                       | 71.4     | 0.0        |
| Shere                          | 42.9     | 0.0        |
| Southway, Park Barn            | 83.3     | 0.0        |
| The Square, Onslow<br>Village  | 60.0     | 0.0        |
| The Street, Tongham            | 33.3     | 0.0        |
| Woodbridge Hill,<br>Guildford  | 55.6     | 0.0        |
| Woodbridge Road,<br>Guildford  | 25.8     | 0.0        |
| Worplesdon Road,<br>Stoughton  | 21.4     | 14.3       |

<sup>&</sup>lt;sup>42</sup> Source: BRC-Springboard data

4.28. Table 24 (above) shows the number and percentage of occupied Class E(a) and vacant non-residential units in the borough's local centres as of March 2022.

4.29. The local centres have performed consistently well for many years and the percentage of vacant units has remained considerably below the national town centre average (currently 11.2%). There was very little overall change since the last survey in May 2019 and, in most of the local centres, there were no vacant units at all. The highest vacancy rate recorded for an individual centre, 14.3%, was in Worplesdon Road, Stoughton, and was for two out of a total of 15 units.

4.30. The proportion of Class E(a) shop units in the local centres has remained mostly high, with only four out of the 21 centres having less than a third of units in E(a) use. The proportion of E(a) units has reduced for all local centres since May 2019, which was the result of the omission of residential uses from the calculation of the vacancy rate. The accuracy of monitoring has also now been improved following adjustments that were made to remove residential uses at the edge of Shalford and Shere local centres from the boundaries of these centres on the Policies Map in 2020 (as part of updating other Local Plan constraint layers post-adoption of the Local Plan: Strategy and Sites).

4.31. The churn in the occupation of some retail units suggests that where vacancies in local centres exist, they may not tend to persist in the long term; however, this will be easier to ascertain from continued monitoring.

# 5. Planning Contributions

## Community Infrastructure Levy ('CIL')

5.1. The Community Infrastructure Levy (CIL) is a charge on new development that would be paid by landowners or developers when new developments are built. It can assist in delivering infrastructure to support development. CIL is not currently in place in Guildford and developer contributions toward infrastructure are primarily secured through s106 agreements.

5.2. With an adopted CIL, landowners and developers are required to pay the relevant amount of CIL when they build their new buildings or extensions. CIL is non-negotiable but there are certain exceptions, such as affordable housing and developments by charities and those used for charitable purposes. The amount to be paid is based on the net floor area of a new building or extension, and its use. It applies to most new buildings and extensions over 100 sq. m. (gross), and to new homes regardless of their floor area.

5.3. The CIL must be based on Local Plan development and infrastructure, and CIL rates are informed by viability evidence.

5.4. The Council undertook further viability work during 2021-22 to support the emerging Local Plan: Development Management Policies. This work is ongoing and may also contribute to providing updated evidence to support the preparation of a draft charging schedule (DCS) for consultation. The Government has proposed the introduction of a new consolidated 'Infrastructure Levy' to replace the existing parallel regimes for securing developer contributions. This has been confirmed via the Levelling up and Regeneration Bill tabled in May 2022 after the end of this monitoring period. Progress in this regard will be monitored.

## **Section 106 Annual Review**

5.5. Planning obligations assist in mitigating the impact of unacceptable development to make it acceptable in planning terms. Planning obligations may only constitute a reason for granting planning permission if they meet the tests that they are necessary to make the development acceptable in planning terms. They must be:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.

5.6. Section 106 figures are published via Guildford Borough Council's Annual Infrastructure Funding Statement. The IFS reflecting information for 2021/22 was published on the 5<sup>th</sup> January 2023, and is available to view at: https://www.guildford.gov.uk/article/24697/What-are-planning-obligations

## **Thames Basin Heaths Special Protection Area**

5.7. Detailed analysis of the S106 contributions relating to the Thames Basin Heaths Special Protection Area (TBH SPA) are provided at Appendix 2: TBH SPA Position Statement. The appendix details developer contributions towards both Suitable Natural Alternative Greenspace (SANG) and Strategic Access Management and Monitoring (SAMM).

# 6. Duty to Cooperate

6.1. The duty to cooperate ('DtC') was introduced by the Localism Act 2011<sup>43</sup>. It places a legal duty on local planning authorities, county councils in England and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of local plan preparation in the context of strategic cross boundary matters.

6.2. The Duty to Co-operate Matrix at Appendix 1 demonstrates the various organisations that the Council consults and corresponds with for the purposes of the duty-to-cooperate in plan-making, alongside the relevant strategic issues that they are consulted upon.

6.3. During the monitoring period, the Council continued work on part 2 of the Local Plan, the 'Local Plan: Development Management Policies' document. The Council undertook a 6 week consultation on the proposed submission version of the Plan, and consulted and gathered feedback from prescribed bodies. In November 2022, the Inspector held a 3 day hearing session, in which stakeholders and prescribed bodies who submitted representations to the proposed submission version of the Plan were invited. Stakeholders were then invited to comment further on 'main modifications' proposed by the Inspector to make the Plan sound during a 7 week consultation conducted by the Council over Dec 2022 to Feb 2023.

6.4. During the monitoring period, the Council also responded to all relevant consultations received by the prescribed bodies.

<sup>&</sup>lt;sup>43</sup> Available online at: http://www.legislation.gov.uk/ukpga/2011/20/contents/enacted.

# 7. Evidence Base

7.1. Paragraph 31 of the NPPF states that:

The preparation and review of all policies should be underpinned by relevant and upto-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.

7.2. The full list of supporting evidence-base documents submitted to the Local Plan Examination in Public is available online at:

https://www.guildford.gov.uk/newlocalplan/media/26763/Submission-core-and-supportingdocuments/pdf/Submission\_core\_and\_supporting\_documents.pdf.

7.3. The evidence-base documents that support the plan Local Plan Part 2: Development Management Policies are published as the Council prepares them, and are available to view online at: <u>https://www.guildford.gov.uk/localplanpart2examdocuments2</u>

# 8. Appendices

# Appendix 1 - Duty to cooperate matrix of prescribed bodies and strategic issues

|   | Housing | Gypsies<br>and<br>Travellers | Employment<br>and retail | Transport    | SPA /<br>SANG | Green<br>Belt | AONB | Infrastructure<br>(incl. health &<br>schools) | Flooding and waterways | Waste        | Natural<br>environment &<br>open space |
|---|---------|------------------------------|--------------------------|--------------|---------------|---------------|------|---|------------------------|--------------|--|
| Surrey County Council                   | ~       | ~                            | ~                        | ✓            | $\checkmark$  | ~             | ~    | ~   | ✓                      | ✓            | ✓                                      |
| Elmbridge Borough Council               | ~       | ~                            |                          | ✓            | $\checkmark$  | ~             |      | ~   | ✓                      |              | ✓                                      |
| Epsom and Ewell Borough<br>Council      |         | ~                            |                          |              |               |               |      |   |                        |              |  |
| Mole Valley District Council            |         | ~                            |                          |              |               | ~             | ~    | ~   | ✓                      |              | ✓                                      |
| Reigate and Banstead<br>Borough Council |         | ~                            |                          |              |               |               | ~    |   |                        |              |  |
| Runnymede Borough Council               | ~       | ~                            |                          |              | $\checkmark$  |               |      |   |                        |              |  |
| Spelthorne Borough Council              |         | ~                            |                          |              |               |               |      |   |                        |              |  |
| Surrey Heath Borough<br>Council         | ~       | ~                            |                          |              | ~             | ~             |      | ~   |                        |              | $\checkmark$                           |
| Tandridge District Council              |         | ~                            |                          |              |               |               | ~    |   |                        |              |  |
| Waverley Borough Council                | ~       | ~                            | ~                        | ✓            | $\checkmark$  | ~             | ~    | ✓   | ✓                      |              | ✓                                      |
| Woking Borough Council                  | ~       | ~                            | ~                        | ✓            | $\checkmark$  | ~             |      | ~   | ✓                      |              | ✓                                      |
| Hampshire County Council                |         |                              |                          | $\checkmark$ | $\checkmark$  |               |      | ~   | ✓                      | $\checkmark$ |  |
| Hart District Council                   |         |                              |                          |              | $\checkmark$  |               |      |   |                        |              |  |
| Rushmoor Borough Council                | ~       | ~                            | ~                        | ✓            | ~             |               |      | ~   | ✓                      |              | ✓                                      |

| Prescribed Bodies                              |              |   |              |              |   |   |   |   |   |   |   |
|--|--------------|---|--------------|--------------|---|---|---|---|---|---|---|
| Civil Aviation Authority                       |              |   |              | ~            |   |   |   |   |   |   |   |
| Clinical Commissioning<br>Groups (CCG)         |              |   |              |              |   |   |   |   |   |   |   |
| Guildford and Waverley CCG                     |              |   |              |              |   |   |   | 1 |   |   |   |
| North West Surrey CCG                          |              |   |              |              |   |   |   | v |   |   |   |
| Surrey Heath CCG                               |              |   |              |              |   |   |   |   |   |   |   |
| Environment Agency                             |              |   |              |              |   |   |   |   | ~ | ~ | ~ |
| Enterprise M3 LEP                              | $\checkmark$ |   | $\checkmark$ | $\checkmark$ |   |   |   | ~ |   |   |   |
| National Highways                              |              |   |              | ~            |   |   |   |   |   |   |   |
| Historic England                               | $\checkmark$ |   | ~            |              |   |   |   |   |   |   |   |
| Homes and Communities<br>Agency (HCA)          | ✓            | ~ |              |              |   |   |   |   |   |   |   |
| Mayor of London                                | $\checkmark$ | ~ | ~            |              |   | ~ |   |   |   |   |   |
| National Health Service<br>Commissioning Board |              |   |              |              |   |   |   | ~ |   |   |   |
| Natural England                                |              |   |              |              | ~ |   | ✓ |   |   |   | ✓ |
| Office of Rail and Road                        |              |   |              | ~            |   |   |   |   |   |   |   |
| Surrey Nature Partnership                      |              |   |              |              |   |   |   |   |   |   | ✓ |
| Transport for London                           |              |   |              | ~            |   |   |   |   |   |   |   |

## Appendix 2 – TBH SPA Position Statement 2022

### Introduction

The Thames Basin Heaths Special Protection Area ('TBH SPA') Avoidance Strategy 2017 Supplementary Planning Document ('the SPA strategy') was adopted on 18 July 2017 and took effect on 28 July 2017<sup>44</sup>. The strategy enables residential development to take place that would otherwise be prevented by the provisions of European and national legislation relating to the protection of the Special Protection Area ('SPA').

### Implementation and Monitoring

Officers from Planning, Parks and Countryside and Financial Services meet periodically to assess the progress and to identify and address implementation issues as they arise.

We report on an annual basis to the Joint Strategic Partnership Board ('JSPB') on:

- Suitable Alternative Natural Greenspace ('SANG')<sup>45</sup> delivery and capacity within the borough,
- Housing provision in the 400 metre exclusion zone and zone of influence<sup>46</sup>,
- Our programme for future provision of SANG,
- Monitoring data relating to Strategic Access Management and Monitoring ('SAMM')<sup>47</sup> finances quarterly.

The responsibility for monitoring the effectiveness of the SANG and SAMM approach falls to the JSPB. The JSPB has also taken on the role of organising and funding visitor surveys on fully allocated SANGs across the TBH area in order to provide a standardised, consistent approach to monitoring. The evidence collected has shown that there has been no significant increase in the levels of visitors on the SPA despite an increase in the number of homes within the vicinity of the SPA<sup>48</sup>. Evidence continues to be collected through the SAMM project and further reports will be released in due course.

### **Financial Situation**

The financial position with regard to each of the designated and operational SANG sites at the end of March 2022 is shown in the following table.

<sup>&</sup>lt;sup>44</sup> Available online at: https://www.guildford.gov.uk/tbhspa.

<sup>&</sup>lt;sup>45</sup> See the SPA strategy page 15 for an explanation of SANGs

<sup>&</sup>lt;sup>46</sup> See the SPA strategy page 10 for an explanation of the exclusion zone and zone of influence.

<sup>&</sup>lt;sup>47</sup> See the SPA strategy page 27 for details of the SAMM project.

<sup>&</sup>lt;sup>48</sup> See Natural England Commissioned Report NECR136 http://publications.naturalengland.org.uk/publication/4514481614880768.

| SANG Site  | Contributions received<br>from September 2006 to<br>end of March 2022 | Expenditure incurred<br>from September 2006 to<br>end of March 2022 |
|--|---|---|
| Chantry wood   | £5,545,673.20   | £328,590.96   |
| Effingham Common                                       | £2,961,968.47   | £94,315.06  |
| Lakeside Nature Reserve                                | £765,399.79   | £244,090.85   |
| Riverside Nature Reserve and<br>Parsonage Watermeadows | £3,537,846.36   | £706,773.11   |
| Sub Totals   | £12,810,887.82  | £1,373,769.98   |

The table above does not include financial information for SANGs outside of Council ownership as the Council does not receive money or spend money on works for these SANGs. The Council does, however, monitor capacity in SANGs outside of Council ownership (see next section).

### **Current SANG capacity**

We closely monitor the amount of SANG allocated to housing developments as they occur to ensure that sufficient SANG capacity is available. Since the previous monitoring report, Horsley Meadows SANG has come online. The table below sets out the position at the end of June 2022.

| SANG Site  | Total amount of SANG (hectares) | SANG<br>already<br>allocated<br>(hectares) | Remaining<br>SANG<br>(hectares) |
|--|---------------------------------|--|---------------------------------|
| Riverside Nature Reserve and Parsonage<br>Watermeadows | 24                              | 24   | 1.41                            |
| Effingham Common                                       | 34                              | 14.20                                      | 17.62                           |
| Lakeside Nature Reserve                                | 4                               | 3.82                                       | 0.18                            |
| Chantry Wood   | 38                              | 33.33                                      | 5.08                            |
| Ash Green Meadows (inc. Bin Wood)*                     | 26.17                           | 22.12                                      | 5.36                            |
| Runfold Bridge (Manor Farm)*                           | 17.7                            | 7  | 10.7                            |
| Horsley Meadows*                                       | 24.79                           | 6.04                                       | 18.75                           |
| Remaining overall                                      |                                 |  | 59.1                            |

\*These are SANGs outside Council ownership.

Figures may not sum due to rounding.

Where developers have obtained planning permission and have been allocated SANG but have not yet paid the fees required to secure the SANG capacity, it is possible that the development will not be built out and the planning permission will expire. In these circumstances the SANG allocation will be withdrawn and the capacity will be made available for other developments.

The Local Plan: Strategy and Sites 2015 - 2034 includes a housing requirement of 562 homes per year (2015 - 2034). On the basis of this number, the existing unallocated SANG capacity of 59.1 hectares, which equates to around 3,078 new homes (assuming an average

occupancy of 2.4 people per house and a provision of 8 hectares of SANG per thousand people which equates to 0.0192 hectares of SANG per house), is expected to last 5.5 years (3,078 new homes, divided by 562 homes per year = 5.5 years).

#### **Emerging SANGs and additional capacity**

There are a number of new SANGs expected to come online in the near future.

Tyting Farm, to the southeast of Guildford, will be a Council owned SANG and was expected to come online early in 2020. Works were delayed due to Covid and later due to the need for Thames Water to lay a pipeline through the site. The first half of the SANG is now expected to open in summer 2023 with the remainder by 2025. It will provide around 40 additional hectares of SANG capacity as an extension to the existing SANG at Chantry Wood. The SANG will provide mitigation for developments in and around the Guildford urban area.

Wood Street Knoll SANG (formally referred to as Russell Place Farm SANG) is a new 34 hectare SANG in Worplesdon parish near Wood Street Village. It has been granted planning permission and the first phase of 21 ha (covering around 1,092 homes) is expected to come online shortly. The SANG is privately owned and has a total capacity for approximately 1,770 homes, with a catchment stretching from Guildford to Ash.

These two SANGs together would provide around 74 hectares of SANG, enough land for just over 3,848 homes.

Eashing Fields SANG near Eashing is within Guildford borough and has been brought forward by the developer of a housing site over the borough boundary in Waverley. The SANG works are complete and the SANG is open, but it is not clear whether this SANG will provide capacity for developments in Guildford borough and its catchment does not cover parts of Guildford Borough where significant development is expected. As a result, it is not included in the SANG capacity table.

Burpham Court Farm is a Council owned site to the northeast of Guildford. The Council has submitted a change of use planning application create new open space and a Nature Reserve covering 45.9 hectares. It is not clear at this stage how much of that land would be available for use as SANG.

The Local Plan: Strategy and Sites contain allocations for large strategic sites at Gosden Hill Farm, Blackwell Farm and the Former Wisley Airfield. These strategic site allocations will deliver bespoke SANGs to provide mitigation for their own developments and may provide spare capacity for other developments.

The Council continues to work to ensure enough SANG is in place:

- The Council is working with the owners of privately owned SANGs that are not yet online to agree a mechanism that enables their SANGs to come online for new developments. This includes providing advice on legal agreements for either the Council or a suitable qualifying body to take on the SANG
- We continue to engage with landowners who are considering offering their land for use as SANG, including developers proposing new SANGs.

#### Strategic Access Management and Monitoring (SAMM)

Hampshire County Council is the body that holds the funds provided by developers for SAMM. This money is used by JSPB to fund monitoring and access management on the SPA. Since 2011, and up to the end of March 2022 we have passed £2,588,362.12 to Hampshire County Council (who host the SAMM project) for this purpose.