



GUILDFORD  
B O R O U G H

# Authority Monitoring Report

Guildford Borough Council

1 April 2023 – 31 March 2024

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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. Authority 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 (2023 – 2024) covers the Monitoring Period between 1 April 2023 to 31 March 2024.

The Local Plan: Strategy and Sites (2015 - 2034) was adopted on 25<sup>th</sup> April 2019. Part 2 of the Local Plan: Development Management Policies was adopted on 22<sup>nd</sup> March 2023, and replaced most of the remaining 2003 policies. This AMR discusses the policies and performance indicators that formed the adopted development plan during that time and data is available to assess.

### 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](mailto:planningpolicy@guildford.gov.uk), or
- Phone us on: 01483 444 471

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

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# 1. Introduction

## What is an Authority Monitoring Report?

- 1.1 The Authority Monitoring Report (2023/24) ('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 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?

- 1.3 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>
- 1.4 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.

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<sup>2</sup> Planning Practice Guidance Paragraph 027; Reference ID: 12-027-20170728.

- 1.5 This AMR reports on the financial year from 1<sup>st</sup> April 2023 to 31<sup>st</sup> March 2024 (the monitoring period).
- 1.6 This AMR was published according to the December 2024 iteration of the National Planning Policy Framework.

### **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 help inform Councils if there is a need to undertake a partial or full update of the local plan, when carrying out a review at least every 5 years from the adoption date.

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<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) (part 1 of the Local Plan),
  - The Local Plan: Development Management Policies (part 2 of the Local Plan),
  - Residual policies of the Local Plan 2003 that were not superseded by parts 1 or 2 of the Local Plan,
  - 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 The Council decided to commence with an update to the Plan in February 2024, following a review of the current Local Plan. A report regarding timescales will be taken to Executive Council, outside the monitoring period covered in this AMR.
- 2.3 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>.
- 2.4 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>. 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.
- 2.5 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>. All policies from both parts of the Local Plan (Part 1: Strategy and Sites and Part 2: Development Management Policies) were given full weight as part of the development plan. The weight to be given to the residual policies from the Local Plan 2003 is set out in a note which is available on our website<sup>7</sup>.

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<sup>4</sup> NPPF Paragraph 2.

<sup>5</sup> NPPF Paragraph 49.

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

<sup>7</sup> See [www.guildford.gov.uk/guildfordlocalplan](http://www.guildford.gov.uk/guildfordlocalplan)

## 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 available to view at the following link: <https://www.guildford.gov.uk/lDs>. This is no longer up to date.
- 2.7 The Council made the decision to update the Local Plan: Strategy and Sites (2019) in February 2024<sup>8</sup>, which was within the monitoring period of this AMR. Following this decision, work has commenced on producing a new Local Plan and an updated LDS will be published in due course.

## Neighbourhood Development Plans and Orders

- 2.8 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.
- 2.9 Once they pass a local referendum, neighbourhood plans become part of the Council's Development Plan. They must be considered when planning decisions are made, along with the Local Plan and national planning policy.
- 2.10 The Council did not designate any new neighbourhood areas during the monitoring period. Ash was designated as a neighbourhood area on 26<sup>th</sup> April 2024, which is outside of the monitoring period. There are now 13 Neighbourhood Areas, covering the parishes of Ash, Albury, Artington, East Horsley, East 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).
- 2.11 During the monitoring period, the Council consulted on proposals to modify the Burpham Neighbourhood Area and the designation of a new Burpham Neighbourhood Forum. The consultation ran from 30<sup>th</sup> August 2023 to the 12<sup>th</sup> October 2023. As a result of the consultation, the Burpham Neighbourhood Area boundary was modified, and a new Burpham Neighbourhood Forum was designated.
- 2.12 The Neighbourhood Areas can be seen on the interactive map at: <https://www.guildford.gov.uk/neighbourhoodplanninginformation>
- 2.13 Five Parish Councils; Ash, 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

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<sup>8</sup> See <https://democracy.guildford.gov.uk/ieListDocuments.aspx?CId=159&MIId=1663>



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**

- 2.14 The Council adopted one Supplementary Planning Document ('SPD') during the monitoring period, the Green Belt SPD, which was adopted on the 23<sup>rd</sup> November 2023.
- 2.15 Outside of the monitoring period, the draft Special Protection Area Tariffs and draft Planning Contributions for Open Space SPDs were consulted upon during the period 8<sup>th</sup> May-12<sup>th</sup> June 2024. Following these consultations, the Planning Contributions for Open Space SPD was adopted at Executive on the 8<sup>th</sup> August 2024, which is outside of the monitoring period. The Special Protection Area Tariffs SPD was adopted at Executive on the 5<sup>th</sup> September 2024, also outside of the monitoring period.
- 2.16 Also outside the monitoring period, the draft updated Climate Change, Sustainable Design, Construction and Energy SPD was consulted upon during the period 5<sup>th</sup> July-9<sup>th</sup> August 2024. This SPD was adopted at Executive on the 3<sup>rd</sup> October 2024.

### 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. This figure reflected the Objectively Assessed Need for Guildford at the time the plan was examined.

3.3 The Town and Country Planning Regulations (2012) require that Authority Monitoring Reports outline progress against targets for the monitoring period (2023 – 2024).

Table 1\*: Previous Housing Completions (net)

Monitoring Period	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	Total
Completions	299	351	352	609	459	594	584	3,248

\*This table is for the completion of C3 dwellings. It does not include any contribution from student accommodation or other communal 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).

3.5 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.

3.6 The separately-identified student accommodation need for 428 C3 dwellings is included within the general housing need figure of 562 dwellings per annum.

3.7 The Manor Park Masterplan for the University of Surrey (02/P/02505) shows 145,200 square

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

metres of student and staff residential accommodation, which has capacity for approximately 4,171 bedspaces to be built. It is worth noting that 479 bedspaces in PBSA at Manor Park were completed by September 2018 and 669 completed by September 2019. On 20/05/2020 it was determined that prior approval was not required under Schedule 2, Part 11, Class B of the Town and Country Planning (General Permitted Development) Order 2015 (as amended) for the demolition of four student halls of residence with 224 bedspaces on the University Stag Hill campus; these halls are still in situ but unoccupied.

3.8 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 (2024)<sup>10</sup>.

Table 2a: Planning permissions for purpose-built student accommodation 1 April 2023 to 31 March 2024

Application Reference	Date Approved	Address	Proposal
22/P/02108	9/5/23	The Bridge (YMCA), Bridge Street, Guildford	Renovating 112 existing rooms plus 18 new studio flats.
21/P/02559	15/6/23	Jewsons, Walnut Tree Close, Guildford	84 studio flats plus 38 cluster units (261 cluster bedspaces) (with 54 non-student affordable flats).

3.9 To calculate the equivalent number of C3 bedspaces for off campus purpose-built student accommodation, 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 one C3 unit. This approach aligns to that outlined in the Delta User Guide: Housing Flows Reconciliation for purpose built purpose-built, separate homes (e.g. self-contained flats clustered into units with 4 to 6 bedrooms) for students.

3.10 Table 2b below shows the student bedspace completions for this monitoring period, and the equivalent number of C3 bedspaces.

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

Table 2b: Completions of purpose-built student accommodation 1 April 2023 to 31 March 2024

Application Reference	Site	Bedspaces	Equivalent C3 units
21/P/02296 variation to 18/P/02391	1 & 2 Ash Grove, Guildford	59 studio bedspaces & 20 two bed studios (40 bedspaces) = 99 bedspaces	79
22/P/02108	The Bridge (YMCA), Bridge Street, Guildford	Renovating 112 existing rooms plus 18 new studios.	18
<b>Total</b>	-	-	<b>97</b>

### Communal accommodation

- 3.11 Communal accommodation, which includes co-living and care homes and nursing homes, contributes towards our housing supply. To calculate the equivalent number of C3 bedspaces for co-living accommodation we use the ratio of 1:1 for larger self-contained studio flats and for the smaller units a ratio of 1:1.8 is used. For care and nursing homes the ratio of 1:1.8 is used. This approach aligns to that outlined in the Delta User Guide: Housing Flows Reconciliation (2023) More details are in the following section on ‘Housing for different groups in the community’.
- 3.12 Table 2c below shows the communal bedspace completions for this monitoring period, and the equivalent number of C3 bedspaces.

Table 2c: Completions of communal accommodation 1 April 2023 to 31 March 2024

Application Reference	Site	Bedspaces	Equivalent C3 units
18/P/01014	Silverbirch House, Land North of Keens Lane and Tangle Lane, Guildford	65	36
<b>Total</b>	-	-	<b>36</b>

### Total housing completions

- 3.13 The total housing completions figure for 2023/24 is 717 homes. This includes 584 C3 dwellings (see Table 1 above), along with 133 equivalent C3 units<sup>11</sup>.
- 3.14 Table 2d shows the total housing completions in the borough, including C3 equivalent units (comprised of purpose-built student accommodation and other forms of communal accommodation).

<sup>11</sup> The 97 units are composed of 97 student studio flats (see Table 2b)

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

Monitoring Period	2015/ 16	2016/ 17	2017/ 18	2018/ 19	2019/ 20	2020/ 21	2021/ 22	2022/ 23	2023/ 24	Total
<b>C3 Completions</b>	387	294	299	351	352	609	459	594	584	<b>3,542</b>
<b>C3 equivalent completions</b>	-	-	-	-	-	252	278	99	133	<b>762</b>
<b>Total Completions</b>	<b>387</b>	<b>294</b>	<b>299</b>	<b>351</b>	<b>352</b>	<b>861</b>	<b>737</b>	<b>693</b>	<b>717</b>	<b>4,691</b>

### Planning Permissions Granted for New Homes

3.15 Table 3 reflects the number of new homes granted permission in the borough on an annual basis. The figure for 2023/24 is slightly higher than the figure for the 2022/2023 period. The largest application that was approved during this monitoring period, and that makes up most of the new homes permitted, was application 23/P/01211: Land bounded by the Friary Centre Bus Station, North Street, Guildford, approved for 471 homes (net). It also worth noting that application 21/P/02232: Debenhams, Millbrook, Guildford was another large application permitted during the monitoring period, for 183 homes (initially approved for 185, but reduced to 183 via a non-material amendment).

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

Monitoring 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
2022 / 2023	594	253
2023 / 2024	1,052	219

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

<sup>12</sup> These figures include permissions that have since expired or have been superseded.

3.16 Table 4 (below) shows the proportion of new homes approved by site size. During the monitoring period, the largest percentage came from sites sized 51-200, which made up 45% of the homes approved during the period.

Table 4\*: Proportion of new homes approved by site size (net) <sup>13</sup>

Site size (Net number of homes)	2019/2020	2020/2021	2021/2022	2022/2023	2023/2024
Less than 5	9%	17%	3%	10%	10%
6 – 15	7%	10%	3%	8%	5%
16 – 50	15%	14%	6%	7%	3%
51 – 200	69%	22%	9%	13%	45%
200+	-	37%	79%	62%	37%

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

### Outstanding Capacity

3.17 ‘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 (2024) (‘LAA’). The LAA (2024) was published in September 2024 and can be viewed at: <https://www.guildford.gov.uk/article/25375/Land-Availability-Assessment>. A factual update was published in December 2024 and can be viewed at: <https://www.guildford.gov.uk/article/22879/Monitoring-the-Local-Plan>.

### Five-Year Housing Land Supply

3.18 As at 1 April 2024, the Council has a Five-Year Housing Land Supply position of 5.94 years, as confirmed in the Land Availability Assessment’s factual update in December 2024. Initially, the Council put forward a position of 6.64, but the position was reduced to 5.94 following the Inspector’s conclusions from the Hester’s Yard (planning ref: 22/P/01371) planning appeal. The appeal was decided in November 2024.

3.19 A new NPPF was published in December 2024. This re-introduced the need to provide a 5% buffer as part of land supply calculations (paragraph 78). These changes are both reflected in the Five-year Housing Land Supply – Factual Update December 2024 published on our website<sup>14</sup>. This reports the Council’s five-year housing land supply as 5.66 years.

3.20 Briefly, section 5 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

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

<sup>14</sup> Available online at: <https://www.guildford.gov.uk/article/22879/Monitoring-the-Local-Plan>.

Development.

### **Housing Delivery Test ('HDT')**

- 3.21 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: <https://www.gov.uk/government/collections/housing-delivery-test>
- 3.22 The Government published the Housing Delivery Test: 2023 measurement on the 13th December 2024, and this comprises the most recent HDT result. The 2023 HDT found we had delivered 153% of our housing requirement between 2020 and 2023. This figure is lower than the 2022 HDR measurement for GBC which was 171%.
- 3.23 The NPPF indicates at paragraph 79, 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. As Guildford's HDT is greater than this figure, no action plan is required.

Table 5: Guildford Housing Delivery Test Results

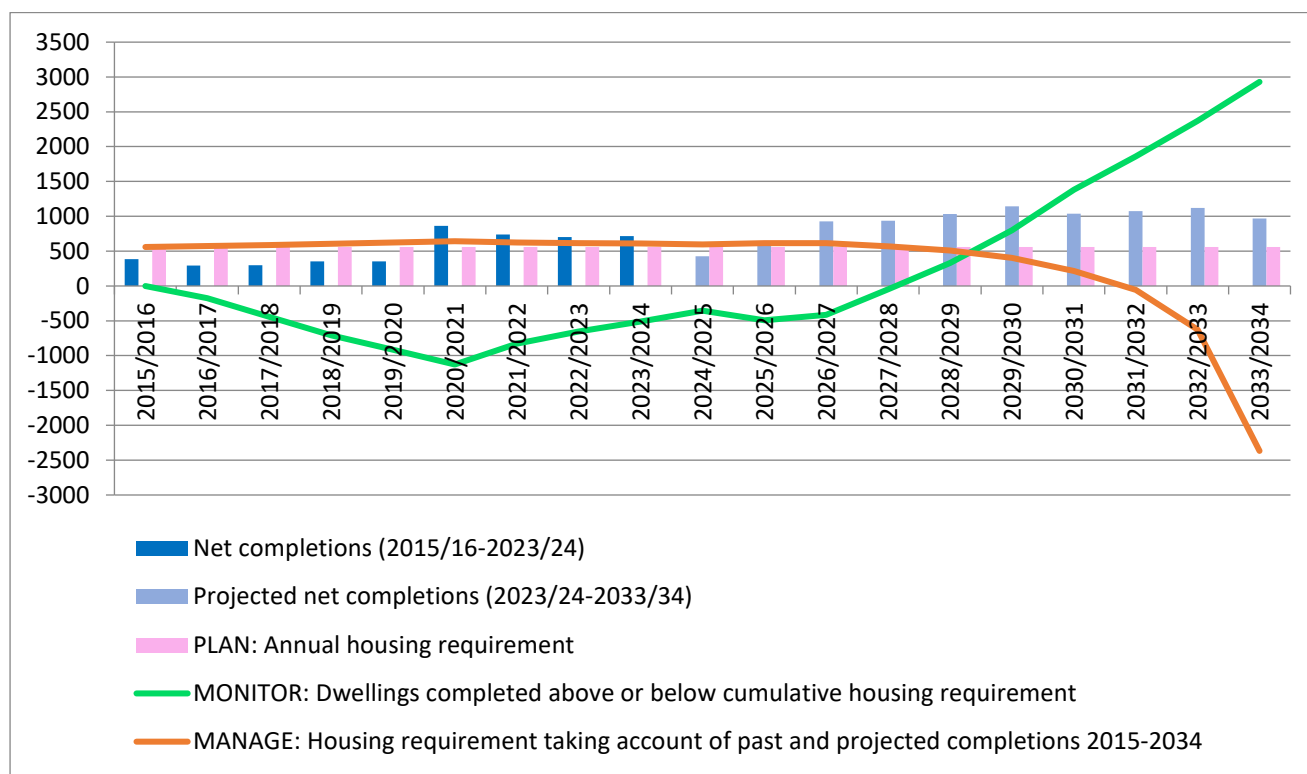
<b>Year</b>	<b>Measurement</b>
2018	75%
2019	83%
2020	90%
2021	144%
2022	171%
2023	153%

### **Housing Trajectory**

- 3.24 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 be delivered in the future.
- 3.25 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.

**Housing Trajectory Graph<sup>15</sup>**



**Provision of Affordable Homes**

3.26 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>16</sup>.

3.27 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>17</sup>.

<sup>15</sup> This table appears in the initial publication of the Land Availability Assessment, and is now out of date following the Hester’s Yard appeal decision. Please view this graph alongside the December 2024 Five Year Housing Land Supply factual update.

<sup>16</sup> The latest version of the NPPF is available online at: <https://assets.publishing.service.gov.uk/media/675abd214cbda57cacd3476e/NPPF-December-2024.pdf>

<sup>17</sup> Available online at: <https://www.guildford.gov.uk/article/25486/Strategic-Housing-Market-Assessment>



Table 6: Affordable homes completed in Guildford borough

Monitoring Period	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
2022 / 2023	40 <sup>18</sup>
2023 / 2024	121 <sup>19</sup>

### Brownfield land development ratio

3.28 Historically, the majority of housing completions have been developed on brownfield land in Guildford. This is 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 7\*: Ratio of completions on brownfield or greenfield land (gross)

Total Completions	Brownfield Land	Percentage (%) of total	Greenfield Land	Percentage (%) of total
593	340	57%	253	43%

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

3.29 Table 7 illustrates that in the monitoring period, there was more brownfield development in the borough. Application 14/P/02168: Guildford Railway Station, Station View, Guildford contributed the most to the number of brownfield land completions, providing 96 C3 units. For greenfield land, application 20/P/01615: Land at Manor Farm, The Street, Tongham provided the highest number of greenfield land completions, totalling 172 during the monitoring period.

3.30 The ratio of development on brownfield land is likely to decrease or become more even throughout the plan period, particularly as a result of the site allocations as set out in the

<sup>18</sup> This figure was derived from the affordable housing indicator H&J4 within the Corporate Performance Indicators publication. This is available online at: <https://democracy.guildford.gov.uk/documents/s30346/Item%2007%20-%20Appendix%201%20PMR%20Q1%2023-24%20-%20Final.pdf>

<sup>19</sup> This figure was derived from unpublished affordable housing completion figures, compiled by Guildford Borough Council's housing team. It is anticipated that these figures will be published officially via Guildford's corporate monitoring indicators in early 2025.

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**

- 3.31 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.
- 3.32 Part 1 of the most recently published Brownfield Land Register was published on the 3<sup>rd</sup> of October 2024, which was outside the monitoring period. The register contains 77 brownfield sites, in which 54 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 granted planning permission**

- 3.33 Table 8: Type of homes granted planning permission (Gross) (2023 / 2024)

Type of Home	Number of new homes (gross)	Percentage of new homes (gross)
House or Bungalow	380	29%
Flat or Studio	913	71%
Unspecified	-	-

- 3.34 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%

3.35 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 9 (below) identifies the mix of housing granted permission this monitoring year, which is not entirely out of line with the SHMA mix (particularly as regards the affordable housing mix), which itself is in any event not prescriptive. The greater number of smaller one- and two-bedroom market housing tends to reflect the character and location of the planning permissions granted during the monitoring period. These included larger scale Town Centre schemes such as at the former Debenhams site (21/P/02232) and North Street (23/P/01211) which reflected a comparatively greater number of one- and two-bedroom flatted development. The table does not represent the full granted applications for the year, as some units granted have yet to have a determined bedroom mix.

Table 9\*: Mix of housing sizes granted planning permission (gross) (2023 / 2024)

Type of homes	Affordable Housing (%) (gross)	Market Housing (%) (gross)
One Bedroom	41%	33%
Two Bedroom	36%	39%
Three Bedroom	21%	20%
Four Bedroom+	2%	8%

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

#### **Affordable provision on qualifying sites**

3.36 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.

3.37 During the monitoring period, 6 applications met the 11 dwelling threshold as set out in policy H2. In total, 4 of the 6 applications met the target as set out in policy H2. As shown in table 10 below, of the total 919 units provided by the qualifying sites, 157 of these units were affordable (or approximately 17% of the total).

3.38 In addition to this, application ref 21/P/02559 (Jewsons, Walnut Tree Close) delivered 54 affordable units, through a student accommodation scheme which does not require affordable housing. The site was allocated in the LPSS for 175 C3 units, which would have delivered 70 units. However, to make up for the loss of 70 affordable units that the allocated C3 scheme would have delivered, 54 affordable units are also being provided. As well as Jewsons, Guildford Borough Council delivered a 100% affordable housing scheme (application ref 21/P/01786; 51 Clover Road) of 8 homes. This application did not engage policy H2, as it delivered under 11 units, and so is not included in the total at table 10. In total, including these two permissions and those at Table 10, there were 219 affordable housing units approved in the monitoring year.

3.39 Table 10 (below) demonstrates qualifying sites where applications were approved during this monitoring period, and the total percentage of affordable units which were agreed. Where the development has not met the 40% target, an explanation is provided as to why this was not achieved.

Table 10: Percentage of affordable housing on qualifying sites (2023 / 2024) (gross)

Application Reference	Address	Total Units	Total Affordable Units	Affordable Percentage	Justification
21/P/02232	Debenhams, Millbrook, Guildford, GU1 3UU	185	5	3%	Viability concerns
22/P/01786	Weyside Urban Village (Slyfield Regeneration Programme), Slyfield Green, Guildford	81	32	40%	-
22/P/01083	Orchard Farm, Harpers Road, Ash, Guildford, GU12 6DE	51	21	41%	-
21/P/01211	Land at May and Juniper Cottages, Ash Green Road, Ash, Guildford, GU12 6JH	93	37	40%	-
23/P/01211	Land bounded by the Friary Centre Bus Station, North Street, Leapale Road, Guildford	471	47	10%	Viability concerns
21/P/01456	Land at Poyle Road, Tongham, Guildford.	38	15	40%	-
<b>TOTAL</b>	-	<b>919</b>	<b>157</b>	<b>Approx. 17%</b>	-

### The Loss of Homes

3.40 During the monitoring period, two planning permissions were granted which resulted in the net loss of at least one dwelling, without a replacement C3 unit. In total, three units were lost. The first application (22/P/01921) allowed the change of use from a single C3 residential dwelling to a C2 children's care home. The second application allowed for the demolition of two C3 residential dwellings for the erection a residential care home (23/P/00356). The number of residential losses during the monitoring period was higher than has tended to be the case. Generally, the number of homes lost through permissions remains low.

## **Housing for Different Groups in the Community**

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

- 3.41 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. Annex 2 of the NPPF 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.
- 3.42 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 counts toward the Council's housing supply in accordance with the Housing Delivery Test.
- 3.43 The West Surrey SHMA Guildford addendum Report (2017) identifies a need for 1,061 specialist homes (which includes extra care, sheltered and C3 use class homes) for older persons between 2015 - 34. This forms part of our overall housing need for C3 use class housing.

### **Planning permissions approved for specialist housing for older people and people with disabilities**

- 3.44 Table 11 (below) shows the planning permissions relating to C2 use housing for older people and people with disabilities that were approved in this monitoring period.

Table 11: Planning permissions for housing for older people and people with disabilities from 1 April 2023 to 31 March 2024

Application Reference	Date Approved	Address	Proposal	Bedspaces
22/P/00508	03/11/2023	Robertson Nursing Home, Priorsfield Road, Hurtmore, Godalming,	Demolition of existing building for the construction of new replacement Care Home comprising 52 bedrooms at the existing site of Robertson Nursing Home.	52 (15 net) nursing bedspaces
23/P/00356	19/03/2024	Land at Cothelstone and Field Fares, Clandon Road, Send.	Outline planning permission for a 74-bedroom C2 care home	74 residential care bedspaces
22/P/01636	09/10/2023	Land at Former Pond Meadow School, Park Barn	Proposed erection of a three-storey building comprising an extra care facility (Class C2) and associated access	59 extra-care bedspaces

### Housing for Students

- 3.45 Student accommodation is addressed within Section 3 ‘Monitoring Indicators’ of this report. The Council’s Land Availability Assessment (‘LAA’) (2024) Appendix 5 ‘Student and Co-living Accommodation’ sets out a detailed commentary. The LAA (2024) was published in September 2024 and can be viewed at: <https://www.guildford.gov.uk/article/25375/Land-Availability-Assessment>.

### Self-build and Custom House Build

- 3.46 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 (<https://www.guildford.gov.uk/article/24917/What-is-the-self-build-and-custom-housebuilding-register>). Local authorities must have regard to the register when carrying out their Planning, Housing, Regeneration and Land Disposal functions.
- 3.47 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.
- 3.48 In addition to the statutory criteria listed above, additional eligibility criteria apply to Part 1

of the register. Applicants must have lived in the Borough for at least five years prior to their application or 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.

### **Demand for self-build and custom housebuilding in Guildford borough**

- 3.49 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.
- 3.50 The figures for each base period reflect the numbers on the Register after the Council’s eligibility criteria were introduced in 2018 as this reflects 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. Please note that the AMR monitoring period (1 April to 31 March) differs from the Register base period (31 October to 30 October).

Table 12: Number of eligible applicants on Part 1 of the Self-build & Custom Housebuilding Register

<b>Part 1 of Register Base Period (BP)</b>	<b>Number of eligible applicants registering per base period</b>
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
BP6: 31 October 2020 – 30 October 2021	5
BP7: 31 October 2021 – 30 October 2022	4
BP8: 31 October 2022 – 30 October 2023	2

3.51 Table 13 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 13: 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 people registering per base period	Three-year period for meeting demand	Number of plots granted planning permission within three-year period	Cumulative shortfall/surplus of plots
BP1: 01/04/16 – 30/10/16	8	31/10/16 to 30/10/19	7 <sup>20</sup>	-1 shortfall (7 - 8 = -1)
BP2: 31/10/16 – 30/10/17	4	31/10/17 to 30/10/20	6 <sup>21</sup>	1 surplus (6 - 4 - 1)
BP3: 31/10/17 – 30/10/18	8	31/10/18 to 30/10/21	0	-7 shortfall (0 - 8 + 1)
BP4: 31/10/18 – 30/10/19	8	31/10/19 to 30/10/22	18 <sup>22</sup>	3 surplus (18 - 8 - 7)
BP5: 31/10/19 – 30/10/20	0	31/10/20 to 30/10/23	5 <sup>23</sup>	8 surplus (5 - 0 + 3)
BP6: 31/10/20 – 30/10/21	5	31/10/21 to 30/10/24	1 <sup>24</sup>	4 surplus (1 - 5 + 8)

### Planning permissions approved for self-build or custom build plots

3.52 There have been no planning approvals for self-build or custom housebuilding plots within this monitoring period. An outline/hybrid planning application on Land at the former Wisley Airfield (planning ref: 19/P/02223) was approved on 24 May 2024 outside the monitoring period. We have not included these 12 plots in Table 13 as they will not be available in the next few years. Once the phasing of the development is known we can include them in future calculations. There are also custom housebuilding plots at Garlicks Arch (approved 1/6/22) that will be delivered in phases, with 11 plots in Phase 1 (included in Table 13) and two other applications with approval for 4 plots and 1 plot in later phases. Planning permission has also been granted outside this monitoring period but within the three-year time period for granting sufficient planning approvals (31/10/21 to 31/10/24) for a self-build

<sup>20</sup> Keens Lane planning ref: 18/P/01014 approved 7 plots on 07/11/2018.

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

<sup>22</sup> Manor Farm, Horsley planning ref: 20/P/02067 approved 7 plots on 16/2/2022 and L/A Garlicks Arch, Send planning ref: 19/P/02223 approved 11 plots on 1/6/22 (Phase 1).

<sup>23</sup> Land at 408-410 Lower Road, Effingham planning ref: 21/P/01306 approved 4 plots on 28/11/2022 and Land to rear of 168 The Street, West Horsley planning ref: 22/P/00998 approved 1 plot on 2/3/23.

<sup>24</sup> 25a Dagden Rd, planning ref: 24/P/00765 approved 1 plot on 26/7/24.



dwelling at 25a Dagden Rd, planning ref: 24/P/00765 on 26/7/24.

### Preferences of people on the Self- Build and Custom Housebuilding Register

3.53 The preferences for plot location, plot size and number of bedrooms as provided by those individuals on the Self-Build and Custom Housebuilding Register are shown below. Please note that not everybody provides this information as it is voluntary, and some people provided more than one answer.

Table 14: Plot location preference of those on Part 1 and Part 2 of the Self-Build and Custom Housebuilding Register in 2024.

Locations	Number of people expressing a preference
Guildford (unspecified)	16
West of borough, with preferences including Ash, Onslow Village, Seale, Pirbright, Shalford, Tongham, Wanborough, Worplesdon.	8
East of borough, with preferences including Burpham, Charlottesville, Clandon, Gomshall, Horsley, Merrow, Ockham, Pewley, Shere.	10
Surrey	2
Near Godalming	2

Table 15: Plot size preference of those on Part 1 and Part 2 of the Self-Build and Custom Housebuilding Register in 2024.

Size of plot	Number of people expressing a preference
500 square metres or less	7
500 to 1000 square metres	2
1000 to 1500 square metres	3
1500 to 2000 square metres	3
2000 to 3000 square metres	0
3000 to 4000 square metres	5
4000 to 8000 square metres	0
8000 square metres and above	2

Table 16: Number of bedrooms preference of those on Part 1 and Part 2 of the Self-Build and Custom Housebuilding Register in 2024

Number of bedrooms	Number of people expressing a preference
1 bed	1
2 bed	1
3 bed	10
4 bed	13
5 bed plus	7

## Traveller Accommodation

- 3.54 There have been changes to planning policy this year that affect how we monitor the provision of traveller accommodation. An updated definition of gypsies and travellers for the purposes of planning policy was published in Planning Policy for Traveller Sites (PPTS) Annex 1 on 19 December 2023. Essentially, this change broadens the previous 2015 PPTS definition (which was limited to those travellers who had ceased to travel temporarily on grounds of their own or their family's or dependants' educational or health needs or old age) to also include those travellers who have ceased to travel permanently on the same grounds.
- 3.55 This is a significant change as it widens the scope of traveller accommodation needs that Councils are required to meet. The Council is in the advantageous position having assessed and planned for the needs of all travellers including the needs of settled travellers who have ceased to travel permanently and who may meet the updated PPTS definition, and those households of unknown planning status within the Guildford borough Traveller Accommodation Assessment (TAA) 2017.

### Identified traveller accommodation need and requirement

- 3.56 The Guildford borough Local Plan: strategy and sites (2015– 2034) Policy S2: 'Planning for the borough – our spatial development strategy' identifies a requirement of 4 permanent pitches for Gypsies and Travellers and 4 permanent plots for Travelling Showpeople (as defined by the older 2015 version of PPTS) between 2017 and 2034. It also seeks to make provision for 41 permanent pitches for Gypsies and Travellers and 4 permanent plots for Travelling Showpeople (as defined by the older 2015 version of PPTS) and 8 permanent pitches to meet the need of households of unknown planning status between 2017 and 2034.
- 3.57 In the context of the PPTS change to the definition of a traveller, it is considered appropriate to now use the combined figures of traveller accommodation needs as identified in the

adopted Local Plan as our locally set targets. This is considered a robust approach as the details provided within the 2017 TAA do not enable us to definitively confirm which travellers meet the new PPTS definition. The combined figures are 53 pitches for Gypsies and Travellers and 8 plots for Travelling Showpeople over the period 2017 to 2034.

- 3.58 The Council’s Land Availability Assessment (‘LAA’) (2024) Appendix 6 ‘Traveller and Travelling Showpeople Accommodation’ sets out a detailed commentary on the identified need for traveller accommodation, local plan provision, supply and trajectory, planning approvals, the current position and the next 5 years projected supply. The LAA (2024) was published in September 2024 and can be viewed at: <https://www.guildford.gov.uk/article/25375/Land-Availability-Assessment>. Please refer to LAA Appendix 6 for the further detail regarding the reported position.

### **Planning permissions approved for traveller pitches or plots**

- 3.59 During the monitoring period, temporary planning permission was issued on 21/2/24 for four private pitches at Ipsley Lodge. Due to their temporary nature the pitches do not count towards meeting the traveller accommodation target.

Table 17: Permission for Traveller pitches and plots (1 April 2023-31 March 2024)

<b>Application Reference</b>	<b>Date Approved</b>	<b>Address</b>	<b>Proposal</b>
22/P/00738	21/2/2024 (temporary planning permission)	Ipsley Lodge Stables, Hogs Back, Seale	4 Gypsy/Traveller pitches comprising the siting of 4 mobile homes, 4 touring caravans and the erection of 4 dayrooms.

### **Outstanding Capacity for traveller pitches or plots**

- 3.60 ‘Outstanding capacity’ refers to the number of pitches or plots on sites with planning permission that have not yet been built. Information regarding outstanding capacity is covered within the Land Availability Assessment (2024) (‘LAA’) Appendix 6<sup>25</sup>.

### **Five-year traveller land supply**

- 3.61 The Council’s Land Availability Assessment (‘LAA’) (2024) Appendix 6 includes an assessment of land available for traveller accommodation in the next 5 years. The PPTS change to the definition of a traveller and the consequential updated target has had an impact on the five-year traveller land supply. The Council currently has 2.5 years supply of Gypsy and Traveller pitches and 7.5 years supply of Travelling Showpeople plots.

<sup>25</sup> This can be viewed at: <https://www.guildford.gov.uk/article/25375/Land-Availability-Assessment>.

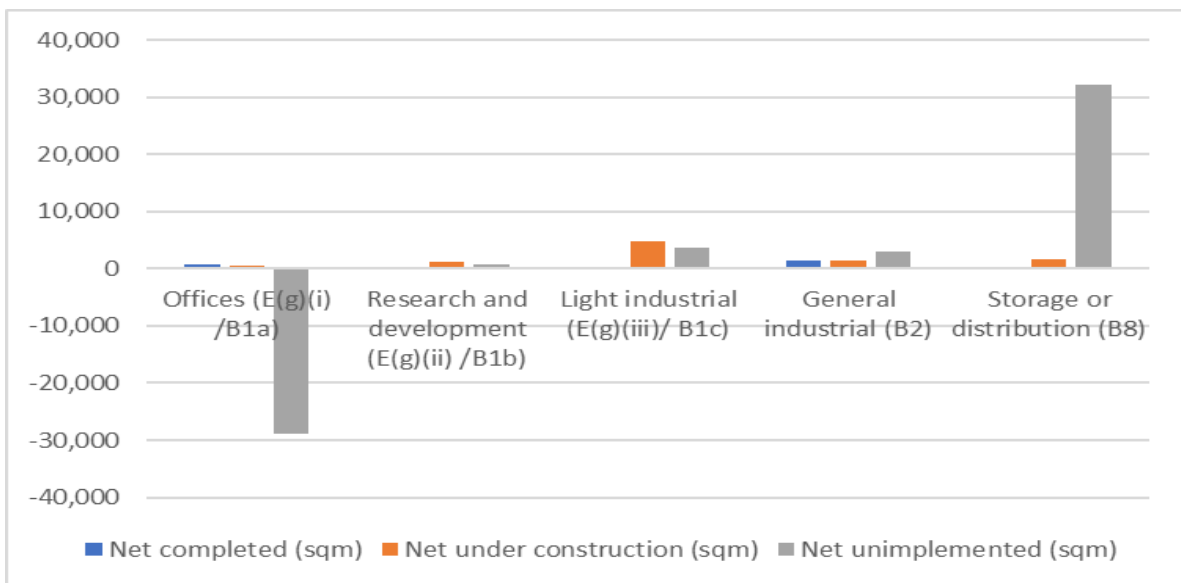
## Economic Development

3.62 The following section provides data in connection with monitoring indicators in the Local Plan Strategy and Sites (2019) relating to economic development and to retail and other main town centre uses.

### Employment Floorspace

3.63 LPSS Policy E1 sets a target for a net gain of between 36,100 and 43,700 sqm of office and research and development floorspace, and 3.7 to 4.1 ha of industrial land over the Local Plan period to 2034. Figure 1 and Table 18 below show the total net change (total gains and losses) of employment floorspace arising from approved planning applications across the borough that were either completed during the 2023-24 monitoring year (1 April 2023 to 31 March 2024), or that were under construction, or unimplemented, as of 31st March 2024<sup>26</sup>.

Figure 1: Net\* sqm change in employment (Class E(g)), B2 and B8 floorspace unimplemented<sup>29</sup>, under construction and completed, 1 April 2023 to 31 March 2024 (Borough-wide)



<sup>26</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 (1 April 2023 to 31 March 2024).

Table 18\*: Net completions and commencements for employment use classes<sup>27</sup> (1 April 2023 to 31 March 2024)

Use class	Net completed (sqm)	Net under construction (sqm)	Net un-implemented
Offices (E(g)(i))	804	566	-28,773
Research and development (E(g)(ii))	0	1,104	825
<b>Subtotal offices/R&amp;D</b>	<b>804</b>	<b>1,670</b>	<b>-27,948</b>
Light industrial (E(g)(iii))	-87	4,868	3,702
General industrial (B2)	1,338	1,390	3,025
Storage or distribution (B8)	0	1,679	32,192
<b>Subtotal industrial</b>	<b>1,251</b>	<b>7,937</b>	<b>38,919</b>

\* 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.

### Employment floorspace completed

- 3.64 Employment floorspace completed during the 2023/24 monitoring period resulted in an overall net gain of 804 sqm of office (class E(g)(i)) floorspace. This was primarily from three schemes: an increase of 1,635 sqm in new offices on the first floor of the White Lion Walk shopping centre, a gain of 1,600 sqm from refurbishment and a two-storey extension to the existing Connaught House offices at 255 High Street, Guildford, and a gain of 667 sqm as part of completion of the Halow charity headquarters, a two-storey mixed use building comprising boat hire, a café and office space. These developments were tempered by a scheme completed under prior approval<sup>28</sup> to convert 2,694 sqm grade A office floorspace at Gateway Guildford, Power Close, off Woodbridge Road into 54 flats.
- 3.65 A net total gain of 1,338 sqm Class B2 general industrial floorspace was completed during 2023/24. This included a gain of just over 950 sqm from construction of 20 new industrial units on the Council-owned Middleton Industrial Estate to replace two existing older and larger industrial buildings. It also included a loss of 210 sqm of general industrial use buildings, which were replaced by three dwellings on land adjacent to 29, Alexandra Road, Ash; and a gain of just over 520 sqm from the change of use of five former nursery buildings at Fernwood Nurseries, Tithebarns Lane, Send, to classic/specialist car repairs and restoration workshops.

<sup>27</sup> Use Classes B1(a), B1(b) and B1(c) were revoked from 1 September 2020 and replaced by Class E(g)(i), E(g)(ii) and E(g)(iii) respectively. See <https://www.planningportal.co.uk/permission/common-projects/change-of-use/use-classes> for details of the current and previous use classes.

<sup>28</sup> See application ref. 21/W/00041, approved under Schedule 2, Part 3, Class O of the Town and Country Planning (General Permitted Development) Order 2015 (as amended).

### **Employment floorspace under construction**

- 3.66 A net gain of 566 sqm office floorspace was under construction at the end of the monitoring year. Most of this was from a new 1,311 sqm office building at Charters Yard, Mary Road, Guildford. This gain was partly offset by a net loss of 1,189 sqm office floorspace at Lantern House, Walnut Tree Close, Guildford, which was being redeveloped with purpose-built student accommodation and ground floor office units<sup>29</sup>.
- 3.67 A new building comprising 4,170 sqm of flexible R&D, light industrial, general industrial and storage or distribution floorspace was under construction on land to the south end of Burnt Common Nurseries, London Road, Send<sup>30</sup>; and a new factory to replace the existing Vision Engineering Ltd factory in Send Road, Send (net gain of just over 3,270 sqm light industrial floorspace and 409 sqm each of office and R&D floorspace).

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

- 3.68 Approved schemes that had not started, or lapsed, at the end of the 2023-24 monitoring period (pipeline schemes) included an overall net loss of 28,773 sqm office (class E(g)(i)) floorspace. Most of this was set to arise from the proposed change of use under prior approval of 57 Ladymead to 108 residential units, leading to a loss of 14,384 sqm office space. Seven out of the 14 applications that made up this total loss were prior approval applications proposing conversion of offices to dwellinghouses under Class MA and Class O Permitted Development<sup>31</sup>, and in one case, of offices to a state-run school under Class T Permitted Development.
- 3.69 Unimplemented planning permissions for other uses included a commercial development at Burnt Common Nurseries comprising 3,300 sqm research and development, light industrial, general industrial and storage and distribution floorspace. There was also a proposed net gain of 6,600 sqm flexible employment space (light industrial, general industrial and storage or distribution) in addition to 30,000 sqm for a proposed new Council depot at the site of Weyside Urban Village (formerly Slyfield Area Regeneration Project, which is Site A24 in the Local Plan: Strategy and Sites).

### **Retail and Town Centre Use Floorspace**

- 3.70 The chart and table below show permitted total net gains and losses of floorspace in use as shops, financial, professional and other services, restaurants and cafes, drinking establishments and hot food takeaways (the former Use Class A uses) across the Borough during the monitoring period (1 April 2023 to 31 March 2024).

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<sup>29</sup> Application ref. 21/P/00956, approved on 9 March 2022.

<sup>30</sup> Floorspace recorded for monitoring purposes as split across use classes in the following proportions: E(g)(ii)/(iii) 695 sqm each; B2 and B8 1,390 sqm each.

<sup>31</sup> Class MA replaced Class O from 1 August 2021.

Figure 2: Net\* sqm retail (Class E(a)) and other former A-use class floorspace granted planning permission, under construction and completed, 1 April 2023 to 31 March 2024 (Borough-wide)

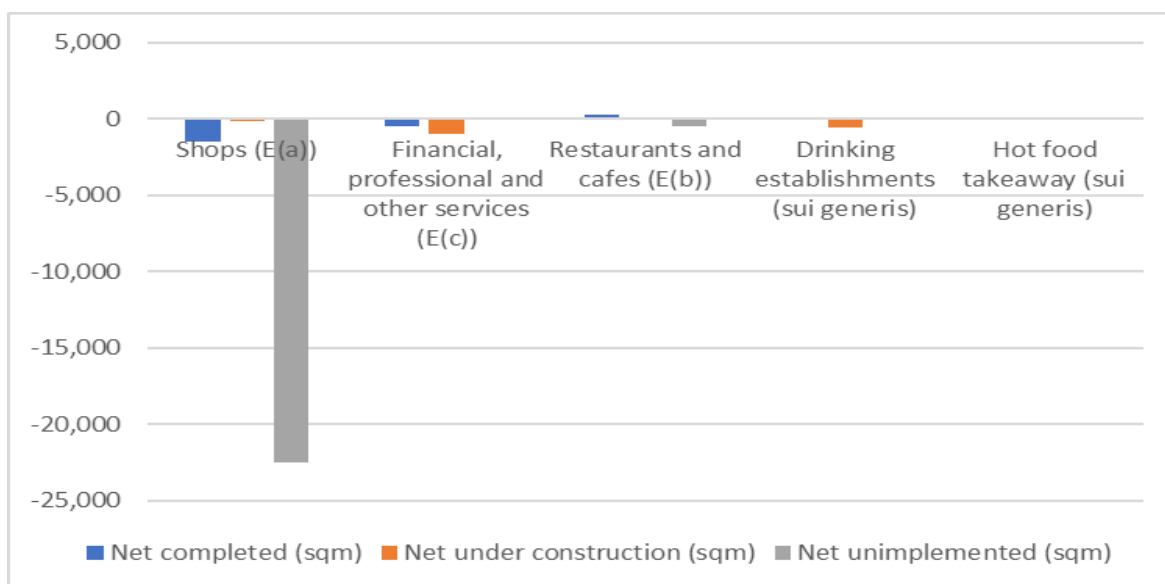


Table 19\*: Net change in retail (Class E(a)) and other former A-use class floorspace, 1 April 2023 to 31 March 2024 (Borough-wide)

Use class	Net completed (sqm)	Net under construction (sqm)	Net unimplemented (sqm)
Shops (E(a))	-1,450	-140	-22,492
Financial, professional and other services (E(c))	-500	-960	-50
Restaurants and cafes (E(b))	290	0	-509
Drinking establishments (sui generis)	0	-540	0
Hot food takeaway (sui generis)	0	0	0
<b>Total</b>	<b>-1,660</b>	<b>-1,640</b>	<b>-23,051</b>

\*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.

3.71 Use Classes A1, A2 and A3 were revoked from 1 September 2020 and replaced by Class E (a, b, c). For planning applications submitted from that date, Class A1/2/3 uses are treated as Class E and Class A4/5 uses are treated as sui generis<sup>32</sup>. Note that the data above may underrepresent the extent of loss of Class E floorspace from prior approval applications<sup>33</sup>, as information on the floorspace of existing uses does not have to be supplied by applicants for this type of application and in most cases is unavailable to the Council. However, where

<sup>32</sup> See <https://www.planningportal.co.uk/permission/common-projects/change-of-use/use-classes> for details of the new and revoked use classes.

<sup>33</sup> Under, for example, Class MA of Schedule 2, Part 3 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended).

possible in such cases the existing floorspace loss was estimated.

### **Retail Floorspace Completed**

- 3.72 There was a net loss of 1,450 sqm of Class E(a) shop floorspace completed during the 2023/24 monitoring year, all of which arose from the refurbishment of the White Lion Walk shopping centre, which was completed in summer 2023. There was also a net loss of 500 sqm financial, professional and other services (Class E(c)) floorspace completed. This was partly from a prior approval scheme proposing conversion of the first and second floors of Seymours Estate Agents in Station Parade, East Horsley, to residential use, under permitted development Class M, and partly from the approved subdivision and change of use of the ground floor of Connaught House, 255 High Street, Guildford, into 290 sqm of flexible Class E(a)/(b)/c floorspace<sup>34</sup>.

### **Retail floorspace under construction**

- 3.73 Retail floorspace under construction at the end of the 2023/24 monitoring period included a net loss of 140 sqm use class E(a) shops and a net loss of 960 sqm use class E(c) financial, professional, and other services floorspace. The net loss of class E(a) floorspace arose from a prior approval (Class MA permitted development) to change the use of 243 High Street, Guildford from a shop (125 sqm) to a new dwelling, in addition to an application to change the use and extension/alter part of the ground floor shop at 1 Cobham Way, East Horsley, to a flat. There was a net loss of 960 sqm financial, professional and other services floorspace under construction over four sites; the largest of these comprised 674 sqm within several buildings at Charters Yard, Mary Road, Guildford.

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

- 3.74 Approved schemes for which construction had not yet started at the end of the monitoring period involved a total permitted net loss of 22,492 sqm use class E(a) shop floorspace. This extensive loss was from a single scheme to redevelop the site of Debenhams in Millbrook to residential accommodation, flexible retail floorspace and a cinema. There was a proposed loss of 50 sqm E(c) financial/professional/other services from conversion of the unused rear part of an estate agent to a 1 bed flat, and a proposed loss of 509 sqm use class E(b) floorspace from a proposed redevelopment of Tillings Café at 55 Station Road, Gomshall to 13 flats and 2 pairs of semi-detached houses<sup>35</sup>.

### **Retail floorspace surveys**

- 3.75 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

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<sup>34</sup> The 290 sqm floorspace increase for this application was recorded as Class E(b) restaurant and cafés.

<sup>35</sup> Application ref. 21/P/01480



on an annual basis. For consistency of results these surveys normally take place close to the end of March. The latest surveys were undertaken in March 2024 and the results of these are presented and commented on below, alongside data for previous years from 2016 onwards<sup>36</sup>.

### Guildford Town Centre Primary Shopping Area (PSA)

Table 20: Breakdown and total of use classes in the Town Centre PSA, 2016-2024<sup>37</sup>

Use class	2016	2017	2019	2022	2023	2024
Shops – E(a)	269	263	261	245	245	243
Financial/professional/other services – E(c)	28	26	29	45	47	57
Restaurants and cafes – E(b)	38	39	39	48	48	47
Offices – E(g)(i)	5	5	9	3	3	3
Hotels – C1	1	1	1	1	1	1
Dwellinghouses – C3	4	4	6	7	7	7
Non-residential institutions**	7	7	8	N/a	N/a	N/a
Indoor sport and recreation – E(d)	1	0	0	2	3	2
Medical or health services – E(e)	N/a	N/a	N/a	7	6	6
Education – F.1(a)	N/a	N/a	N/a	1	1	1
Display of works of art – F.1(b)	N/a	N/a	N/a	1	1	1
Public or exhibition halls – F.1(e)	N/a	N/a	N/a	1	1	1
Halls or meeting places for community use – F.2(b)	N/a	N/a	N/a	1	1	0
Drinking establishments – Sui generis	9	8	7	8	8	8
Hot food takeaways – Sui generis	11	11	10	4	4	5
Other – Sui Generis	4	4	7	8	8	9
Vacant	22	27	27	62	61	54
Not surveyed	11	14	4	1	0	0
Total (not including residential units and units not surveyed)	395*	391*	398*	437	438	438

\*Tungate Quarter (formerly Shopping Centre) was excluded from the surveys in 2016 - 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 surveys from March 2022 onwards as its redevelopment was complete by then.

\*\*Use Class D1 was abolished in September 2020 and replaced by Use Classes E(e-f) and F1).

<sup>36</sup> See <https://www.guildford.gov.uk/article/22879/Monitoring-the-Local-Plan> for previous years' Authority Monitoring Reports.

<sup>37</sup> Note – N/a in this table indicates a use class that was introduced or replaced by the September 2020 amendments to the Use Classes Order. See <https://www.planningportal.co.uk/permission/common-projects/change-of-use/use-classes>.

Table 21: Number and percentage of Use Class E(a), E(b), and vacant units in the PSA, 2016-2024 (out of all surveyed ground floor non-residential units)

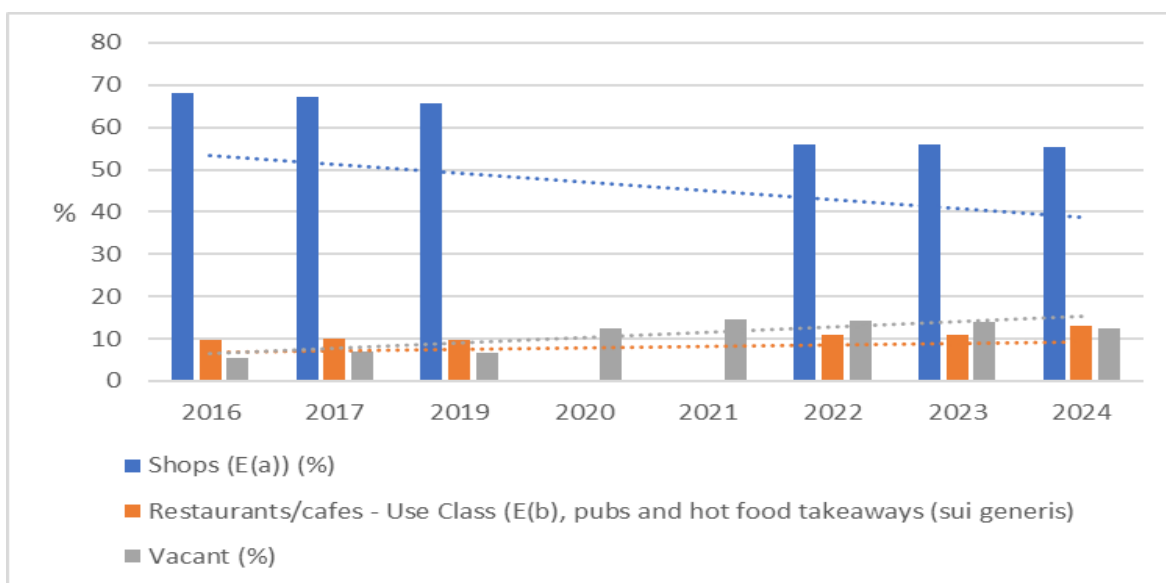
Use class	May 2016	May 2017	May 2019	Jul 2020	May 2021	Mar 2022	Mar 2023	Mar 2024
E(a) (%)	269 (68.1%)	263 (67.3%)	261 (65.6%)	**	**	245 (56.1%)	245 (55.9%)	243 (55.5%)
Restaurants/cafes (E(b) (%)	38 (9.6%)	39 (10%)	39 (9.8%)	**	**	48 (11%)	48 (11%)	57 (13%)
Vacant (%)	22 (5.6%)	27 (6.9%)	27 (6.8%)	12.4%*	14.7%*	62 (14.2%)	61 (13.9%)	54 (12.3%)

Note: The national town centre (high street, and overall) vacancy rate was 14% in the last quarter of 2023; Source: Local Data Company

\*Data from Experience Guildford

\*\* No comparative data available

Figure 3: Percentage of shops, food and drink uses, and vacant units in the Town Centre PSA, 2016-2024



3.76 Tables 20 and 21 and Figure 3 above indicate a fall in the proportion of vacant units across the Town Centre PSA between March 2023 (13.9%) and March 2024 (12.3%). This was more significant than the 0.3% fall between March 2022 and March 2023. The vacancy rate of 12.3% across the PSA at the end of March 2024 was below the national average high street vacancy rate, which rose to 14% in the last quarter of 2023<sup>38</sup>, from 13.8% in Q4 of 2022<sup>39</sup>. This was the first survey since May 2019 in which the proportion of vacancies in the town centre was recorded as lower than the national average and may be an early sign of recovery from the pandemic’s influence on consumer spending in ‘bricks and mortar’ stores,

<sup>38</sup> Source: <https://www.localdatacompany.com/blog/vacancyratemonitor>

<sup>39</sup> Source: British Retail Consortium and LDC: <https://www.localdatacompany.com/blog/press-release-retailers-cautious-to-invest-in-new-stores>

although it is likely to be too soon to draw firm conclusions.

- 3.77 The proportion of class E(a) retail units in March 2024 (55.5%) remained almost identical to March 2023 (55.9%)<sup>40</sup>. There was a slight increase in the proportion of restaurants and cafes (class E(b)), most of which reoccupied previously vacant units.

Table 22: Number/change in vacant units by street or shopping centre in PSA, 2023-2024

	Mar 2023	Mar 2024	Vacant gain (+) or loss (-)	Total units	Mar 2024 Vacant %
Angel Gate	0	0	0	6	0.0%
Castle Street	0	1	1	8	12.5%
Chapel Street	3	2	-1	19	10.5%
Chertsey Street	0	1	1	10	10.0%
Friary Street	2	1	-1	18	5.9%
High Street	20	17	-3	134	12.7%
Jeffries Passage	5	4	-1	12	36.4%
Leapale Road	0	0	0	1	0.0%
Market Street	2	0	-2	15	0.0%
Milkhouse Gate	1	0	-1	5	0.0%
North Street	8	6	-2	56	10.9%
Phoenix Court	1	0	-1	7	0.0%
Quarry Street	0	0	0	3	0.0%
Swan Lane	1	1	0	16	6.3%
The Friary Centre	5	7	2	55	13.2%
The Shambles	0	0	0	4	0.0%
Tunsgate	1	0	-1	15	0.0%
Tunsgate Quarter	3	6	3	23	24.0%
White Lion Walk	9	8	-1	21	38.1%
Woodbridge Road	0	0	0	10	0.0%
<b>Total in PSA</b>	<b>61</b>	<b>54</b>	<b>-7</b>	<b>438</b>	<b>12.3%</b>

- 3.78 As Table 22 (above) shows, the highest percentage of vacancies in the Town Centre PSA in March 2024 were in Jeffries Passage and White Lion Walk. This was the same situation at the time of the March 2023 survey, whilst the percentage of vacancies in the High Street fell by 2.2% between these two survey dates. The 8 vacant units (38.1%) in White Lion Walk (which the Policies Map designates as secondary frontage) may have artificially skewed the vacancy rate for the PSA upwards slightly, as most of the vacancies in this centre arose temporarily to enable the recent refurbishment of the centre to take place, which was approved under planning application reference 21/P00573 and completed in summer 2023.
- 3.79 Whilst several vacant ground floor retail units remain in White Lion Walk, at the time of writing there were new tenants lined up to occupy them.

<sup>40</sup> The fall in the number of E(a) shop uses and corresponding increase in E(c) financial/professional/other service uses in 2022 was primarily due to the September 2020 amendments to the Use Classes Order. This repositioned services that previously fell in Use Class A1, for example hairdressers and travel agents, into Use Class E(c)(i).

Table 23\*: Previous use\*\* of units recorded as vacant in March 2024 survey - for High Street, White Lion Walk and whole of PSA

Use Class	E(a)	E(b)	E(c)	E(d)	F2(b)	Vacant
High Street	5	0	0	0	0	11*
White Lion Walk	8	0	0	0	0	8*
PSA	11	1	4	1	1	34

\*Most of the vacant units in the High Street and across the PSA as a whole in March 2024 were also recorded as vacant in the March 2023 survey. \*\* as of March 2023.

3.80 Table 23 (above) shows the previous use of units recorded as vacant in March 2024 in the High Street, White Lion Walk and across the PSA. The majority of these units were also vacant in March 2023. Whilst there were still some vacancies in White Lion Walk, all of the vacant units were under offer.

3.81 There were even more positive signs for the High Street. Two of the 16 total vacant units in the High Street were due to be reoccupied or reopened imminently, according to on-site signage. Nine of the units that were vacant in March 2023 were reoccupied, whilst only 5 of the vacant units in March 2024 were 'newly vacant'.

3.82 The overall vacancy rate across the PSA – whilst lower than in May 2023 – remains above pre-pandemic level, which may reflect evidence of a corresponding increased market share from Internet-based sales outlets. Recent sales figures indicate that the online share of the percentage of total retail sales across the country declined steadily since the pandemic, from its highest level of 37.8% at its peak in January 2021, to 26.1% in April 2024<sup>41</sup> and now appears to be following its previous (gradual upward) trajectory.

3.83 There has been a steady increase nationally in footfall in high streets, retail parks and shopping centres, based on week-on-week data<sup>42</sup>.

## District and local centres

### District centres

3.84 Guildford's district and local shopping centres have over past years performed consistently well in terms of vacancy rates compared to the national average for town centres (which include district and local centres). This remained the case even at the height of the Covid-19 pandemic when many other centres experienced high vacancies resulting from a fall in consumer demand, as shoppers turned instead to the Internet for certain purchases,

<sup>41</sup> Source: Office for National Statistics – Internet sales as a percentage of total retail sales (ratio) (%): <https://www.ons.gov.uk/businessindustryandtrade/retailindustry/timeseries/j4mc/drsi>

<sup>42</sup> Source: Office for National Statistics – Economic activity and social change in the UK, real-time indicators: 5 April 2024: <https://www.ons.gov.uk/economy/economicoutputandproductivity/output/bulletins/economicactivityandsocialchangeintheukrealttimeindicators/28march2024>

particularly for comparison goods. The success of these centres could be partly because they tend to offer essential services that particularly benefit local residents (e.g., convenience food stores, takeaways and hairdressers). These may also have helped to support other businesses providing non-essential goods and services.

Table 24: Total and % of occupied and vacant non-residential units in district centres (March 2024)

Use Class	Wharf Road, Ash		Station Parade, E Horsley		Ripley	
	No. units	%	No. units	%	No. units	%
Shops - E(a)	15	53.6	13	43.3	14	35.9
Restaurants and cafes - E(b)	2	7.1	4	13.3	4	10.3
Financial/professional/ other services - E(c)	5	17.9	8	26.7	11	28.2
Medical/health services - E(e)	0	0	1	3.3	1	2.6
Offices - E(g)(i)	0	0	0	0	0	0.0
Public library - F1(d)	0	0	1	3.3	0	0.0
Sui generis – Pubs	0	0	0	0	4	10.3
Sui generis – Hot food takeaways	3	10.7	1	3.3	1	2.6
Sui generis (not inc. pubs/HFT)	3	10.7	0	0	2	5.1
Vacant*	0	0	2	6.7	2	5.1
Residential - C3	1	N/a	0	N/a	15	N/a
<b>Total not inc. residential</b>	<b>28</b>	<b>100</b>	<b>30</b>	<b>100</b>	<b>39</b>	<b>100</b>

\*Note: The national town centre vacancy rate was 13.8% in March 2023. Source: British Retail Consortium and LDC

3.85 Table 24 (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 2024. Few changes of use had taken place in the district centres (none in Ash district centre) since the date of the previous survey in March 2023.

3.86 There were zero vacant units in Ash district centre, a situation which has remained unchanged since May 2022. The 5.1% vacancy rate (2 units) in Ripley district centre reflects an improvement from 12.8% (5 units) in March 2023, whilst the 6.7% vacancy rate (2 units) in East Horsley district centre shows a very slight increase as there were no vacant units in the centre in either of the previous two survey years. Whilst slightly above that of Ash district centre, the latest recorded vacancy rates for East Horsley and Ripley are well below the national town centre vacancy rate, which was 14% in the last quarter of 2023<sup>43</sup>.

<sup>43</sup> Source: <https://www.localdatacompany.com/blog/vacancyratemonitor>

## Local Centres

Table 25: Total and percentage of vacant non-residential units in local centres (March 2024)

Local centre	Total units	No. units vacant	% vacant
Aldershot Road Westborough	10	0	0
Ash Vale	14	3	21.4
Stoughton Road, Bellfields	5	0	0
Bishopsmead Parade	13	1	7.7
Collingwood Crescent	7	0	0
Effingham	6	0	0
Epsom Road, Merrow	17	0	0
Fairlands	9	0	0
Jacobs Well	5	0	0
Kingfisher Drive, Merrow	4	0	0
Kingpost Parade, Burpham	17	0	0
Madrid Road, Guildford Park	8	0	0
Send	7	0	0
Shalford	7	0	0
Shere	6	0	0
Southway, Park Barn	5	0	0
The Square, Onslow Village	6	0	0
The Street, Tongham	9	0	0
Woodbridge Hill, Guildford	29	0	0
Woodbridge Road, Guildford	14	0	0
Worplesdon Road, Stoughton	13	1	7.7

- 3.87 Table 25 (above) shows the number and percentage of vacant non-residential units in the borough's local centres as of March 2024.
- 3.88 Like the district centres, the borough's local centres have performed consistently well for many years and the percentage of vacant units has remained considerably below the national town centre average. There was very little overall change in the total and proportion of vacant units since a year ago and, in most of centres, there were no vacant units at all. Four centres had fewer vacancies than a year ago, whilst one had higher vacancies. The highest vacancy rate recorded in an individual centre, 21.4%, was noted in Ash Vale, which had three vacancies out of a total 14 units.
- 3.89 The churn in the occupation of some retail units over previous years suggests that where vacancies in local centres exist, they tend not to persist in the long term. This will however continue to be monitored.

## 4. Planning Contributions

### Community Infrastructure Levy ('CIL')

- 4.1 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.
- 4.2 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.
- 4.3 The CIL must be based on Local Plan development and infrastructure, and CIL rates are informed by viability evidence.
- 4.4 The Government has proposed the introduction of a new consolidated 'Infrastructure Levy' to replace the existing parallel regimes for securing developer contributions. This was progressed via the Levelling up and Regeneration Act which achieved Royal Assent in October 2023. However, following the end of this monitoring period, the Government indicated that they intend to focus on improving the existing system of developer contributions, which means the Government is not implementing the Infrastructure Levy as introduced in the Levelling-up and Regeneration Act 2023.

### Section 106 Annual Review

- 4.5 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.
- 4.6 Section 106 figures are published via Guildford Borough Council's Annual Infrastructure Funding Statement. The IFS reflecting information for 2022/23 is available to view at: <https://www.guildford.gov.uk/article/24697/What-are-planning-obligations>. At the time of

publication for this AMR, the figures for 2023/24 had not yet been published.

## Thames Basin Heaths Special Protection Area

- 4.7 The Thames Basin Heaths Special Protection Area (the 'SPA') Avoidance Strategy 2017 Supplementary Planning Document ('the SPA strategy') was adopted in July 2017<sup>44</sup>. The SPA strategy enables residential development to take place that would otherwise be prevented by legislation that prevents adverse impacts on the SPA.
- 4.8 Under the SPA strategy, net new residential development within 5km of the SPA must:
- fund or provide Suitable Alternative Natural Greenspace ('SANG') to attract visitors away from the SPA, and
  - fund Strategic Access Management and Monitoring ('SAMM'), a programme of visitor management and monitoring on the SPA.
- 4.9 See the SPA Strategy for more information about these measures.

### Implementation and Monitoring

- 4.10 Officers from the Planning Policy, Development Management, Parks and Countryside and Financial Services teams meet periodically to assess the progress and to identify and address implementation issues as they arise.
- 4.11 The Joint Strategic Partnership<sup>45</sup> ('JSP') is responsible for monitoring the effectiveness of SANG and SAMM. The JSP organises and funds visitor surveys on fully allocated SANGs across the TBH SPA 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 TBH SPA despite an increase in the number of homes within its vicinity<sup>46</sup>. Evidence continues to be collected through the SAMM project.
- 4.12 We report on an annual basis to the JSP Board on SANG delivery and capacity, housing delivery within SPA zones, and monitoring and financial data relating to the SAMM project.

### Financial Situation

- 4.13 The financial position for each of the operational SANGs at the end of March 2024 is shown in the following table. We have changed the data that we provide in this section since the 2023 AMR so that it only includes data relevant for planning.

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<sup>44</sup> Available online at: <https://www.guildford.gov.uk/article/25055/Thames-Basin-Heaths-special-protection-area-SPD>.

<sup>45</sup> For more information about the JSP visit <https://www.surreyheath.gov.uk/planning-and-building-control/planning-policy/thames-basin-heaths-special-protection-area/joint-strategic-partnership>

<sup>46</sup> See Natural England Commissioned Report NECR136  
<http://publications.naturalengland.org.uk/publication/4514481614880768>



Table 26: SANG financial position at 31<sup>st</sup> March 2024.

SANG Site	Planning contributions* 1 April 2023 to 31 March 2024	Balance at 31 March 2024
Chantry wood and Tyting Farm	£58,231.05	£6,374,795.96
Effingham Common	£567,597.24	£4,148,087.36
Lakeside Nature Reserve	£35,469.61	£579,395.37
Riverside Nature Reserve and Parsonage Watermeadows	£193,077.46	£3,335,676.69
Totals	£1,087,235.82	£14,437,955.38

\* This data is for planning contributions and excludes income from interest and licencing payments.

4.14 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 monitor capacity in those SANGs (see the next section).

### Current SANG capacity

4.15 We closely monitor the amount of SANG capacity that is allocated to housing developments to make sure that enough capacity is available. The table below sets out the position at the start of August 2024.

Table 27: Current capacity on SANG sites at August 2024.

SANG Site	Total amount of SANG (hectares)	SANG already allocated (hectares)	Remaining SANG (hectares)
Riverside Nature Reserve/Parsonage Watermeadows	24	23.95	0.05
Effingham Common	34	18.59	15.41
Lakeside Nature Reserve	4	3.91	0.09
Chantry Wood and Tyting Farm	51	47.16	3.84
Ash Green Meadows (inc. Bin Wood)*	26.17	21.14	5.03
Runfold Bridge (Manor Farm)*	17.7	8.16	9.54
Horsley Meadows*	24	6.65	17.35
Oldlands Copse*	TBC	TBC	TBC
Remaining overall			51.31

Figures may not sum due to rounding.

\*These SANGs are outside Council ownership.

4.16 Developments are allocated capacity in a specific SANG when they get planning permission. If a development does not pay the SANG tariff and the planning permission expires, the SANG allocation will be withdrawn and the capacity will be made available for other developments.

4.17 SANG is provided at a minimum of 8 hectares per thousand people. Homes across the SPA region average 2.4 occupants. This equates to 0.0192 hectares of SANG per average house. The unallocated SANG capacity of 51.31 hectares would therefore provide mitigation for

around 2,672 new homes, though the exact amount depends on the mix of home sizes that is delivered. Many of the homes that make up our annual housing delivery figures (set out in the annual Land Availability Assessment) are already permitted and have been allocated SANG capacity, and a large number of proposed homes are on strategic sites that will provide their own bespoke SANG. These homes will not draw on the remaining SANG capacity set out in the table above.

- 4.18 Alongside the SANGs in the table above, Eashing Fields SANG near Eashing at the southern boundary of Guildford Borough is also operational. It is within Guildford borough but has been brought forward by the developer of a housing site in Waverley to provide mitigation for developments that would impact the Wealden Heaths SPA. The SANG is unlikely to provide mitigation for developments in Guildford borough because major development within its catchment in Guildford borough is not planned.

### **Future SANG capacity**

- 4.19 There are a number of new SANGs and phases expected to come online in the near future.
- Council owned Tyting Farm to the southeast of Guildford is an extension to the existing SANG at Chantry Wood. The first tranche of 13ha came online early in 2024 but works to deliver the remainder of the site were delayed initially due to Covid and later due to the need for Thames Water to lay a pipeline through the site. The next tranche of the SANG is now due to open by 2025. The whole site will provide around 40 hectares of SANG. 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 SANG works have been undertaken. The SANG is privately owned and has a total capacity for approximately 1,770 homes, with a catchment stretching from Guildford to Ash. The site owner is discussing with the Council how the SANG can be brought online.
  - Benswood SANG in West Horsley parish is close to completion. The Council expects to take ownership of the SANG once works are signed off. It is a small SANG with limited capacity and most of its capacity will be used for a nearby development, but a small amount of capacity is expected to be available for other developments (to be determined). It is close to Horsley Meadows SANG and is expected to form part of its network so they can share the extended catchment.
- 4.20 Wood Street Knoll and the remainder of Tyting Farm together would provide around 61 additional hectares of SANG, enough land for around 3,172 homes.
- 4.21 Further SANGs are expected to become available at some point in the future. Burpham Court Farm is a Council owned site to the northeast of Guildford. The Council has received

planning permission for change of use to create new open space and a Nature Reserve covering 45.9 hectares. It is not clear at this stage how much of that land will be available for use as SANG and how much will be left over after mitigating the Council's own Weyside Urban Village development.

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

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

- We work 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)**

4.24 Since 2011, and up to the end of March 2024, we have passed £3,425,115.68 to Hampshire County Council for the purpose of funding the SAMM project. The JSP delivers the SAMM project and makes decisions on spending while Hampshire County Council hosts the SAMM project.

## 5. Duty to Cooperate

- 5.1 The duty to cooperate ('DtC') was introduced by the Localism Act 2011<sup>47</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.
- 5.2 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.
- 5.3 During the monitoring period, the Council undertook a duty to cooperate exercise in October 2023 in preparation for a review of the Local Plan. Neighbouring authorities and prescribed bodies were contacted with regards to any strategic issues which would be relevant to the review.
- 5.4 During the monitoring period, the Council also responded to all relevant consultations received by the prescribed bodies.

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<sup>47</sup> Available online at: <http://www.legislation.gov.uk/ukpga/2011/20/contents/enacted>.

## 6. Evidence Base

- 6.1 Paragraph 32 of the NPPF states that: The preparation and review of all policies should be underpinned by relevant and up- to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.
- 6.2 The full list of supporting evidence-base documents submitted for the Local Plan Part 1: Strategy and Sites Examination in Public is available online at:  
[https://www.guildford.gov.uk/newlocalplan/media/26763/Submission-core-and-supporting-documents/pdf/Submission\\_core\\_and\\_supporting\\_documents.pdf](https://www.guildford.gov.uk/newlocalplan/media/26763/Submission-core-and-supporting-documents/pdf/Submission_core_and_supporting_documents.pdf).
- 6.3 The evidence-base documents that support the Local Plan Part 2: Development Management Policies are available to view online at:  
<https://www.guildford.gov.uk/localplanpart2examdocuments2>

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

	Housing	Gypsies and Travellers	Employment and retail	Transport	SPA / SANG	Green Belt	AONB	Infrastructure (incl. health & schools)	Flooding and waterways	Waste	Natural environment & open space
<b>Surrey County Council</b>	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Elmbridge Borough Council	✓	✓		✓	✓	✓		✓	✓		✓
Epsom and Ewell Borough Council		✓									
Mole Valley District Council		✓				✓	✓	✓	✓		✓
Reigate and Banstead Borough Council		✓					✓				
Runnymede Borough Council	✓	✓			✓						
Spelthorne Borough Council		✓									
Surrey Heath Borough Council	✓	✓			✓	✓		✓			✓
Tandridge District Council		✓					✓				
Waverley Borough Council	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
Woking Borough Council	✓	✓	✓	✓	✓	✓		✓	✓		✓
<b>Hampshire County Council</b>				✓	✓			✓	✓	✓	
Hart District Council					✓						
Rushmoor Borough Council	✓	✓	✓	✓	✓			✓	✓		✓
<b>Prescribed Bodies</b>											
Civil Aviation Authority				✓							
Surrey Heartlands Integrated Care Board								✓			
Environment Agency									✓	✓	✓
Enterprise M3 LEP	✓		✓	✓				✓			
National Highways				✓							
Historic England	✓		✓								
Homes and Communities Agency	✓	✓									
Mayor of London	✓	✓	✓			✓					
National Health Service Commissioning Board								✓			
Natural England					✓		✓				✓
Office of Rail and Road				✓							
Surrey Nature Partnership											✓
Transport for London				✓							