

Topic Paper: Housing Delivery

December 2017

To accompany Guildford borough Submission Local Plan: strategy and sites



GUILDFORD
BOROUGH

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Topic Paper:

1. Purpose of this topic paper

- 1.1 This topic paper is one in a series, which sets out how we have developed the key strategy within the Guildford borough Submission Local Plan: strategy and sites document. Each topic paper will look at the relevant national and local guidance that informs the Submission Local Plan. Topic papers explain how the strategy has developed, in addition to the information, evidence and feedback that have informed the choices made in formulating the policies.
- 1.2 The intention of the topic papers is to provide background information; they do not contain any policies, proposals or site allocations. Topic papers have been produced to accompany the Submission Local Plan to the Secretary of State for examination.
- 1.3 The main areas covered by this topic paper are:
 - Objectively assessed housing need
 - Applying constraints (Green Belt, landscape, flood risk)
 - Spatial hierarchy and site allocations
 - Windfall Sites
 - Housing provision and flexibility
 - Ability to contribute towards unmet needs
 - Housing number and trajectory
 - Five year housing land supply
- 1.4 This topic paper explains the development of the Submission Local Plan: strategy and sites, in particular Policy S2 and Site Policies A1 - A59.

2. Policy Context

National context

- 2.1 Our policies must be positively prepared, justified, effective and consistent with national policy and legislation. The National Planning Policy Framework (NPPF) sets out the overarching planning policy framework, supported by National Planning Practice Guidance (NPPG).
- 2.2 The NPPF (paragraphs 47-55, 156 and 159) focuses on delivering a wide choice of high quality homes, significantly boosting housing supply, delivering sustainable, inclusive and mixed communities and meeting the needs of different groups in the community.
- 2.3 The NPPF requires that Local Plans attempt to meet objectively assessed housing needs, and should identify a five-year supply of deliverable housing land, and identify sufficient developable land to meet the housing number for years 6-10 and 11-15 of the plan. Failure to demonstrate a five year supply of deliverable housing land results in relevant policies for the supply of housing not being considered up-to-date (para 49). To ensure there is a realistic prospect of achieving the planned supply, the

NPPF requires a buffer of 5 or 20% (depending on past rates of delivery) to be moved forward from later years into the first five years of the plan.

- 2.4 The NPPF acknowledges that sometimes the supply of new homes can be best achieved through planning larger scale development, considering whether this is the best way to achieve sustainable development (para 52).
- 2.5 In order to have a clear understanding of housing needs in the area, local authorities should prepare a Strategic Housing Market Assessment (SHMA) and Land Availability Assessment (LAA). The guidance for the preparation of these documents is set out in the NPPG. The SHMA should identify the scale and mix of housing and the range of tenures the local population is likely to need over the plan period. The LAA is used to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period.
- 2.6 National policy does allow for the review of Green Belt boundaries in exceptional circumstances, through the preparation of a Local Plan (paragraph 83).

Local context

- 2.7 Housing delivery is a key issue of significant importance for our borough, as there is a history of significant under delivery of housing, leading to affordability issues. We have published a joint West Surrey SHMA (2015) with Waverley and Woking borough councils with a subsequent Guildford addendum (2017). Sitting alongside both is the Review of Housing Needs Evidence across West Surrey HMA. We have also prepared an LAA (2017) to inform our understanding of sites which are considered to be suitable, available and achievable for housing. These documents will be addressed in greater detail in the sections below.
- 2.8 An overarching local approach to housing delivery is set out in the Guildford borough Corporate Plan 2015-20. Under the theme of our borough and environment, our priorities are to:
- Provide a range of housing to meet need
 - Protect green space and limit encroachment into the countryside
 - Sensitively integrate development in existing communities
 - Protect and improve our environment

Neighbourhood Plans

- 2.9 Neighbourhood Planning enables Neighbourhood Forums and Parish Councils to develop a vision and planning policies for their designated neighbourhood area. Those 'Neighbourhood Plans' which are successfully adopted will form part of the statutory development plan for the area that they cover. Where a Neighbourhood Plan is adopted or emerging before an up-to-date Local Plan is in place, the local planning authority should take it into account when preparing the Local Plan policies.
- 2.10 There is currently one adopted Neighbourhood Plan (Burpham), one emerging, post-examination Neighbourhood Plan (Effingham), and one progressing towards examination (East Horsley) within the borough. Six other Parish Councils are also currently producing Neighbourhood Plans.

- 2.11 Burpham Neighbourhood Plan policy B-FD4 requires new developments to consider water supply and flood risk. Local Plan Strategy and Sites policies D2 and P4 address these issues and do not conflict with the adopted neighbourhood plan. Burpham neighbourhood area covers part of Gosden Hill Farm and its policies would therefore carry weight here.
- 2.12 The weight given to an emerging plan will depend on, among other things, the extent to which there are unresolved objections to the plan (NPPF paragraph 216). Therefore, an emerging neighbourhood plan will pick up weight once evidence of consultation is published and the level of unresolved objection is known. At time of writing, the Effingham Neighbourhood Plan has been through examination, which has resolved any remaining objections, and is progressing towards a referendum. The East Horsley neighbourhood plan is progressing towards examination and is accorded very little weight at this stage.
- 2.13 All proposed allocations within the Effingham Neighbourhood Plan are included within the LAA 2017. In relation to East Horsley, the emerging Neighbourhood Plan allocates the Thatcher's Hotel site for 22 homes. This site was removed from the Submission Local Plan following an unsuccessful appeal for the replacement of the hotel with 49 homes. This allocation therefore conflicts with Policy E6 which protects hotels, however the neighbourhood plan currently carries very little weight.
- 2.14 Details are available at <http://www.guildford.gov.uk/neighbourhoodplanninginformation>

3. Evidence base

- 3.1 The National Planning Policy Framework requires us to develop policies based on up to date evidence. Our evidence base comprises documents that have helped inform past and current stages of our Local Plan policy development; emerging evidence will help inform future development of policies for the Local Plan.
- 3.2 The key pieces of evidence base relevant to housing delivery are:
- West Surrey Strategic Housing Market Assessment (SHMA) (2015), West Surrey SHMA: Guildford Addendum Report (2017) and A Review of Housing Needs Evidence across West Surrey Housing Market Area (2017)¹
 - Green Belt and Countryside Study (GBCS) Volumes I – VI ²
 - Land Availability Assessment (LAA) (2017)³

- 3.3 The NPPF (paragraph 14) states:

“At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking. For plan-making this means that:

- *local planning authorities should positively seek opportunities to meet the development needs of their area;*
- *Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:*

¹ Available online at: www.guildford.gov.uk/newlocalplan/shma

² Available online at: www.guildford.gov.uk/newlocalplan/gbcs

³ Available online at: www.guildford.gov.uk/newlocalplan/landavailabilityassessment

- *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*
- *specific policies in this Framework indicate development should be restricted*

3.4 The NPPF (paragraph 159) goes on to say:

“Local planning authorities should have a clear understanding of housing needs in their area. They should:

- *prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The Strategic Housing Market Assessment should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:*
 - *meets household and population projections, taking account of migration and demographic change;*
 - *addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); and*
 - *caters for housing demand and the scale of housing supply necessary to meet this demand;*
- *prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period.”*

3.5 The SHMA forms part of our evidence base and is an assessment of future needs for both market and affordable housing, the type and mix of homes required and the needs of specific groups.

3.6 The assessment covers the West Surrey housing market area, which includes Guildford, Waverley and Woking. People are not constrained by administrative boundaries when moving home or looking for job opportunities so it is important to reflect the particularly strong flows of people moving home or commuting between these three boroughs.

3.7 Whilst the West Surrey authorities share the strongest relationships, there are clearly linkages with the wider area and the SHMA notes that these are relatively strong with adjoining areas, notably Rushmoor, East Hampshire and Runnymede.

3.8 The West Surrey SHMA: Guildford Addendum Report (2017) provides an update to the West Surrey SHMA (2015). The Addendum sits alongside and supplements the West Surrey SHMA. It takes account of the latest population and household projections, the latest post-Brexit economic projections and the latest 2015 mid-year population estimate. This informed the updated Regulation 19 Local Plan (2017), and ensured that the emerging plan was based on the most up-to-date evidence. This update reduced the Objectively Assessed Need (OAN) for Guildford from 693 homes per year (2013 – 2033) to 654 homes per year (2015 – 2034). The base-date for the OAN (and start of the plan period) is the 2015 mid-year population estimates. The end of the plan period is set at a date that would give us a 15 year time period from date of adoption (as recommended by para 157 of the NPPF). This therefore runs to

2034. Over the revised plan period, this therefore equates to a reduction of approximately 1,400 homes.

- 3.9 As part of the examination process into Waverley Borough Council's Local Plan Part 1: Strategic Policies and Sites, the inspector's initial view was that Waverley's OAN (and housing requirement) should be increased. This is in response to a consideration of the latest population/household projections, a greater uplift for affordability factors and London migration, and to meet half of Woking's unmet need.
- 3.10 In order to bring these various strands of evidence together, a 'Review of Housing Needs Evidence across West Surrey HMA' has been prepared. This report sits alongside the West Surrey SHMA: Guildford Addendum and was commissioned in the context set out in Paragraph 2a-007 of Planning Practice Guidance on Housing and Economic Development Needs Assessments, which outlines the following:
- "Local planning authorities should assess their development needs working with the other local authorities in the relevant housing market area ... in line with the duty to cooperate. This is because such needs are rarely constrained precisely by local authority administrative boundaries.*
- Where Local Plans are at different stages of production, local planning authorities can build on the existing evidence base of partner local authorities in their housing market area but should co-ordinate future housing reviews so that they take place at the same time."*
- 3.11 This report considers whether a similar set of circumstances to Waverley exists within Guildford borough that may justify a similar increase for affordability and London migration factors. The review concludes that the uplift applied to Guildford above the demographic baseline is commensurate to the affordability ratio in Guildford when benchmarked against uplifts that have been applied in other areas. In relation to London migration, analysis indicates that the 10 year migration trends that have informed the emerging Local Plan Review are broadly aligned with the population projections used to inform Guildford's OAN. For these reasons, a further uplift above that already made is not considered appropriate. Our ability to meet the remaining 50% of unmet need arising from Woking is discussed in more detail below.
- 3.12 The NPPF states that the SHMA should provide an objective assessment of the full need for market and affordable housing within the housing market area. The SHMA does not set housing targets, as the SHMA itself must not apply constraints relevant to the borough. It is a 'policy off' assessment which forms the starting point for identifying a 'policy on' housing target that takes account of constraints to development.
- 3.13 When developing new Local Plans, the Councils must weigh up the constraints and test different options regarding how much development can be accommodated. For Guildford these include the Surrey Hills Area of Outstanding Natural Beauty, the Thames Basin Heaths Special Protection Area, Green Belt, flood risk and infrastructure capacity, such as the road network.
- 3.14 The Green Belt and Countryside Study (GBCS) assesses all Green Belt and countryside land beyond the Green Belt and identifies Potential Development Areas (PDAs) and Potential Major Development Areas (PMDAs) that could potentially be developed should there be insufficient land within the urban areas to meet identified needs, without harming the overall main purpose of the Green Belt. The purpose of

this study was to identify a wide range of spatial options that we could consider for allocation through the Local Plan process against a wider set of planning and sustainability considerations, subject to the existence of exceptional circumstances.

- 3.15 The study consists of a number of volumes. Stage one of the GBCS process was to sub-divide the borough into land parcels. These land parcels were identified on the basis that they were physically and visually contained with strong defensible boundaries. Each land parcel was then assessed against the four relevant purposes of the Green Belt (Purpose 5: to assist in urban regeneration is considered to apply equally to all land parcels). Relevant to this topic paper are Volume II which identifies PDAs around the urban areas, Volume III which identifies small-scale PDAs around the villages, Volume IV which recommends which villages should be inset and Volume V which identifies major PDAs around villages, a potential new settlement at former Wisley airfield and reconsiders Countryside beyond the Green Belt.
- 3.16 Elements of the GBCS were still being prepared as the draft Local Plan (2014) was being taken through the committee process and so were not fully able to inform this version. In particular was Volume II addendum which was produced in response to the Joint Scrutiny Committee review of the evidence base (January 2014). This review involved a forum with residents and other stakeholders, during which they raised concerns or issues with methodologies of a range of evidence base documents, including the GBCS.
- 3.17 Volume II addendum amended the way in which the land parcels were assessed in relation to two Green Belt purposes. It also reconsidered the identification of PDAs around Guildford urban area. Volume II involved a sieve mechanism, whereby those parcels that were assessed as being the most sensitive against Green Belt purposes were not considered appropriate for development. Given the sustainability merits of development around the urban area, Volume II addendum provided a more detailed consideration of the development potential of all urban edge parcels. Decisions regarding the plan's spatial strategy could then be informed against a wider set of considerations.
- 3.18 This update also included the production of the Green Belt sensitivity map. Each land parcel was colour coded according to the extent to which the land parcel scored against the four Green Belt purposes - green meant it scored 1/4 Green Belt purposes, yellow meant it scored 2/4 and red meant it scored 3/4 or 4/4. This further work helped inform the Regulation 19 Proposed Submission Local Plan (2016) and the subsequently updated Regulation 19 Local Plan (2017).
- 3.19 The LAA assesses land availability for housing and economic development uses. There are three primary roles of the LAA.
- To identify sites and broad locations with potential for development for housing and economic development over the plan period
 - Assess their development potential
 - Assess their suitability for development and the likelihood of development coming forward (availability and achievability)
- 3.20 The LAA has been prepared using the methodology set out in the NPPG. Previous SHLAAs did not use a site size threshold but for subsequent LAAs, the recommended size threshold of five or more homes has been used.

- 3.21 The LAA is important evidence but it does not itself determine whether a site should be allocated for development, nor does it give a site planning permission. The LAA was not updated in full for the Regulation 19 Local Plan (2017), instead an addendum was prepared which provided a factual update and information on the changes to the site allocations. The LAA (2017) provides a full update and is published to accompany the Submission Local Plan. We have used the LAA (2017) to inform housing supply from non-allocated sites in the housing trajectory.
- 3.22 Further information and copies of the evidence base documents are available on the Councils website at: www.guildford.gov.uk/newlocalplan/evidencebase

4. Appraisal

- 4.1 The following section brings together relevant legislation and key evidence base findings where appropriate. It also highlights key consultation feedback from the previous consultations. It highlights the main areas relevant to formulating a Local Plan policy approach for Green Belt and countryside in our borough.

Consultation feedback

- 4.2 As part of developing the Local Plan we have consulted at the following main stages:
- Regulation 18 Issues and options (October 2013) – which identified a range of issues and potential options for how we should plan for Guildford borough
 - Regulation 18 Draft Local Plan (July 2014) – which outlined our preferred approach for planning for Guildford borough
 - Regulation 19 Proposed Submission Local Plan (June 2016) – which included the policies and sites that we had intended to submit for examination
 - Regulation 19 Proposed Submission Local Plan (June 2017) – a targeted consultation on proposed changes to policies and sites
- 4.3 Comments received as part of the consultation stages have been taken into account in the preparation of the Local Plan. The main issues raised in all four consultations, together with our response, is set out in the accompanying Consultation Statement.

Objectively assessed need

- 4.4 The NPPF requires that we have a clear understanding of the housing needs in our area (paragraph 159). This is achieved through the preparation of a Strategic Housing Market Assessment (SHMA) which assesses the full objectively assessed need (OAN) for market and affordable homes across the housing market area (HMA) and identifies the type and mix of homes required including the needs of specific groups in the community.
- 4.5 The final West Surrey SHMA, covering the identified core housing area of Guildford, Waverley and Woking borough councils, was published in September 2015. This incorporates the Office for National Statistics (ONS) 2012 sub-national population projections and Communities and Local Government (CLG) 2012 household projections. It identifies the OAN for each authority between 2013 and 2033. The OAN for Guildford borough is identified as 693 homes per annum or 13,860 over this time period. The West Surrey SHMA: Guildford Addendum Report (2017) which provides a update for Guildford borough and incorporates the latest data available at that time, identifies that the OAN is 654 homes per annum between 2015 and 2034.

- 4.6 Through each of the consultations, objections have been raised in relation to the identified OAN. Independent reviews have been undertaken by David Reeve and Neil McDonald (NMSS) arguing the OAN is too high and the reduction set out in the west Surrey SHMA: Guildford Addendum is too low. Conversely a number of organisations in the development industry, including an independent review by Lichfields, argue that the OAN should be increased further.
- 4.7 GL Hearn, who prepared the SHMA evidence, have reviewed the representations submitted, and consider that the evidence remains robust and the OAN is appropriate. The SHMA has been prepared in accordance with the NPPF and NPPG. This states that the ONS population and CLG household projections form the starting point and based on nationally consistent assumptions. The methodology detailing how the uplifts have been calculated are set out in the SHMA with data clearly sourced.

Unmet needs across HMA

- 4.8 The NPPF requires that we prepare local plans that seek to meet OAN, including unmet needs from neighbouring authorities, where it is reasonable to do so and consistent with achieving sustainable development (paragraph 182).
- 4.9 There is currently unmet need arising within our HMA from Woking Borough Council. Woking has an adopted Core Strategy (2012) which includes an annual target of 292 homes per annum between 2010 and 2027. There is therefore an identified shortfall against their OAN although this is quantified only until 2026/27, the end of their current plan period. Woking is currently preparing a Site Allocations DPD to allocate additional sites to meet their Core Strategy target. The preparation of the Site Allocations DPD has been delayed and has increased the degree of uncertainty in relation to their approach.
- 4.10 The delay is primarily as a result of an alternative spatial option in relation to the location of potential safeguarded land. This was subject to a further Regulation 18 consultation in early 2017, the representations received informing the forthcoming Regulation 19 consultation. Given this uncertainty the extent to which unmet needs remain beyond the plan period will need to be assessed again in light of the contribution that any identified safeguarded land can make to meeting future needs. Therefore for the purposes of its plan-making process, we have assumed an unmet need of 3,150 homes in total arising from Woking (2013/14 – 2026/27).
- 4.11 Waverley Borough Council submitted their Local Plan Part 1 in December 2016. This sought to meet their OAN, as identified in the West Surrey SHMA (2015). Following an initial series of hearing sessions, Waverley consulted on a number of main modifications required to make the plan sound in September/October 2017. This included a revised housing target that seeks to provide for the updated OAN (as set out above) including 50% of the unmet need arising from Woking.
- 4.12 As a result, 50% of Woking's unmet need remains which equates to 1,575 homes to 2026/27. In accordance with the NPPF, we are required where possible to meet full OAN including unmet needs elsewhere in the HMA. We have sought to assess whether we are able to sustainably accommodate the remaining unmet need. This analysis is set out in this topic paper.

Meeting OAN

- 4.13 The NPPF is clear that we should, through our Local Plan, meet OAN unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, or specific policies in the Framework indicate development should be restricted (paragraph 14).
- 4.14 This is reaffirmed in the NPPG which states that assessing need is just the first stage in developing a Local Plan. Once the need has been assessed, we should take account of any constraints, which indicate that development should be restricted and which may restrain our ability to meet OAN.
- 4.15 There are a number of constraints which we have taken account of as we have sought to assess whether we are able to accommodate our OAN. This includes:
- The Thames Basin Heaths Special Protection Area (SPA) which covers the northern parts of our borough,
 - The Surrey Hills Area of Outstanding Natural Beauty (AONB) which covers the southern half of the borough,
 - The Metropolitan Green Belt which covers 89 per cent of the borough,
 - Flood risk across the borough, and which is high within areas of our town centre,
 - Infrastructure capacity where appropriate mitigation is not possible or the delivery of development is contingent upon the timing of the necessary infrastructure upgrades
- 4.16 Our spatial strategy has always sought to meet Guildford's OAN with an appropriate buffer. Provision of a buffer ensures that we are able to meet objectively assessed needs with sufficient flexibility to adapt to rapid change, as required by paragraph 14 of the NPPF. It also provides a robust supply of housing sites to ensure that the housing requirement is met reflecting the uncertainties related to the delivery of certain key infrastructure that is considered necessary to ensure the planned growth is sustainable. In particular, a number of our strategic sites are dependent upon the delivery of Highways England's A3 Guildford scheme. Due to the completion of the scheme only being expected by 2027, a proportion of the supply is assumed to be built after this date.
- 4.17 The West Surrey SHMA: Guildford addendum identifies a lower OAN for Guildford borough (654 homes per year 2015 to 2034 or 12,426 homes over the plan period). This represents a reduction of 1,400 homes. Prior to removing sites from the emerging plan, we explored whether all or part of the 1,400 homes over and above Guildford's OAN could be retained in order to meaningfully contribute towards meeting the unmet needs arising from elsewhere within the HMA. However, having undertaken the exercise we continue to consider that these sites are not appropriate for allocation and should continue to be removed for good planning reasons. This assessment is based on either new evidence or changing circumstances that was not available or known when decisions were taken to include them as proposed site allocations in the Regulation 19 Local Plan (2016). The reasons why these sites are no longer considered suitable for allocation is set out in more detail below.
- 4.18 The other key issue affecting our ability to meet OAN relates to delivery in the early part of the plan period. Whilst every effort has been made to maximise sustainable sites that are able to deliver in the first five years, there remains a significant shortfall when taking account of the deficit accrued since 2015 and the 20% buffer brought

forward from later in the plan period⁴. The Submission Local Plan therefore continues to propose a phased target which begins at a relatively low level in the early years and increases thereafter in line with the expected delivery of infrastructure and strategic sites.

- 4.19 The NPPF requires that we boost significantly the supply of housing (paragraph 47) whilst the NPPG states that local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible (Paragraph: 035 Reference ID: 3-035-20140306). However, this is not possible with Guildford borough, primarily due to the infrastructure that is necessary to support the level of growth that would be required to achieve this. The justification for the phased target is discussed in more detail later in this topic paper. Given this shortfall in the early years, if it were considered appropriate and sustainable to allocate further Green Belt sites to achieve additional early delivery, we would have done so to benefit Guildford's Local Plan. Our own continued shortfall in the early years therefore further reinforces the inability to meet unmet needs arising from within the HMA, which is only identified until 2026/27. This is the same period during which the delivery in Guildford is significantly constrained.
- 4.20 Opportunities to meet unmet needs have however been assessed as part of the Sustainability Appraisal (SA) process. The SA tests a number of reasonable alternative spatial strategy options, one of which seeks to meet approximately 50% of the unmet housing need arising from Woking. This is consistent with the SA testing undertaken to support Waverley Borough Council's emerging plan and the modified housing target based on their inspector's initial view. However, as set out in more detail below, we consider that there are valid planning reasons, such as new evidence or a change in circumstance, which mean they are not able to contribute towards meeting unmet needs in the HMA.
- 4.21 We consider issues of unmet need and early delivery warrant further explanation, particularly in light of recent Inspectors' decisions on other local plan examinations, notably St Albans and Castle Point. In both instances the inspectors considered that insufficient evidence had been prepared to demonstrate whether rigorous and detailed consideration had been given to helping meet the development needs of nearby local planning authorities in a sustainable way, bearing in mind the environmental and other constraints that exist. This topic paper attempts to pull this information together in a coherent way.
- 4.22 In total the Regulation 19 Local Plan (2017) reduced the overall housing supply by approximately 2,000 homes when compared to the Regulation 19 Local Plan (2016). Approximately 1,400 homes were lost through the removal of sites that are no longer considered suitable for allocation for a variety of planning reasons, irrespective of OAN. These are discussed in more detail below. The remaining 600 homes are as a result of a more realistic phasing assumption on two strategic sites, with some delivery expected post plan period, also discussed below.

Assessment of whether surplus sites due to the lower OAN could be used to meet unmet needs

Site allocation A4: Telephone Exchange, Leapale Road, Guildford

⁴ As required by NPPF paragraph 47, bullet 2 which states: 'Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land'

- 4.23 The site is in Guildford town centre and was allocated for 100 homes. The LAA acknowledged that the site was not available presently but identified it as having potential for redevelopment towards the end of the plan period given its location in the town centre. There has since been confirmation that the current lease agreement extends to 2031. The intention is to extend occupation beyond this date as the site is an important node for BT. The site is therefore no longer considered to be developable within the plan period.

Site allocation A18: Land at Guildford College, Guildford

- 4.24 The site is in Guildford urban area and was allocated for 100 homes. There has since been confirmation from the site promoters that the site is only available for student accommodation rather than general housing. This is evidenced by the most recent planning application (17/P/00509) which proposed a student accommodation scheme. Whilst this application was refused, it was not done so on the basis of the principle of student accommodation on this site.

Site allocation A34: Broadford Business Park, Shalford

- 4.25 This site is previously developed land in the Green Belt and was allocated for 100 homes. We have since reconsidered how best to meet both housing and employment needs. Given the loss of employment sites to housing that has already occurred due to permitted development rights, which is expected to continue, we are concerned at the ability to provide sufficient and varied office floorspace. Broadford Business Park is an established business park and, whilst not sequentially preferable, is considered suitable given the inability to identify sufficient sequentially preferable sites. It provides a mix of industrial and office space. It is home to companies such as Gordon Murray Design, a British visionary design and engineering company and Surrey County Council. It is not grade A space and consequentially meets the need for lower cost employment space in the borough. The vast majority of the office floorspace need is proposed to be met within the Submission Local Plan on the extension to the Surrey Research Park – retention of this site would therefore help provide a variety and mix of floorspace.

Site allocation A36: Hotel, Guildford Road, East Horsley

- 4.26 This site is on land proposed to be inset from the Green Belt and was allocated for 48 homes. A planning application was submitted for the loss of the hotel and redevelopment for up to 49 dwellings (15/P/02354) which was refused and subsequently dismissed at appeal. As part of his decision, the inspector concluded that insufficient evidence had been prepared to justify the loss of the hotel. For this reason, it was considered that the site should be removed from the plan and continue to be protected as a hotel until such time as further evidence is presented that satisfactorily demonstrates that the loss would be in accordance with current planning policy.

Site allocation A41: land to the south of West Horsley

- 4.27 This site is an extension to a village that is proposed to be inset from the Green Belt and was allocated for 90 homes. Representations to the Regulation 19 Local Plan (2016) confirmed that the landowner of the majority of the site wishes to gift the land necessary to relocate the existing Raleigh School and associated playing fields onto this site.

- 4.28 At present, there is considerable uncertainty regarding the deliverability of this proposal. Furthermore, Surrey County Council, as the Education Authority, is not looking to expand the school currently. They are also not in a position to either support or progress the relocation of the school. For these reasons, the exceptional circumstances to justify its removal from the Green Belt do not exist. Should this situation change in the future then this proposal could be progressed outside of the Local Plan through the planning application process, accepting there is the requirement to demonstrate very special circumstances.

Site allocation A46: land to the south of Normandy and north of Flexford

- 4.29 This site is an extension to two villages that are proposed to be inset from the Green Belt and was allocated for 1,100 homes. It is a high sensitivity Green Belt site which was only proposed to be allocated previously on the basis of its ability to provide the secondary school required to meet the education needs arising from development in the west of the borough. Since then, the promoters of Blackwell Farm have confirmed that they are willing to provide a secondary school on their site. Blackwell Farm is a preferable location in relation to both school place planning and sustainability perspectives, and was only discounted previously on the basis that the site was not available for education provision.

- 4.30 The site consists of the whole land parcel assessed to be of high sensitivity so the allocation of this land would result in significant harm to the Green Belt. However great weight was given to allocating a site that could provide an eight form entry secondary school in the west of the borough. Whilst there would continue to be some sustainability benefits associated with the allocation of the site in relation to other services that the site could provide, without the secondary school these do not outweigh the harm of locating this scale of development in a relatively unsustainable location.. Additionally whilst the site is close to an existing train station, the service is currently infrequent and, without the new secondary school, there is may not be sufficient justification for an increase in service frequency.

Site allocation A47: Land to the east of the Paddocks, Flexford

- 4.31 This site is an extension to a village that is proposed to be inset from the Green Belt and was allocated for 50 homes. The site is currently designated as a Site of Nature Conservation Interest (SNCI). It has been resurveyed and is considered to still be worthy of the SNCI status. Whilst it is possible on certain SNCIs to carry out some development while maintaining the features of interest, it is not the case here. It is considered that most types of development would lead to a direct loss of part of the interest feature (unimproved grassland). Given this habitat has declined dramatically, about 97% has been lost in England in the last 60 years, it is considered important and worthy of continued designation and protection.

Delivery on strategic sites within the plan period

- 4.32 Since the consultation of the Regulation 19 Local Plan (2016), we have also reconsidered the delivery profile for the strategic urban extensions around Guildford urban area, namely Blackwell Farm and Gosden Hill. One of the key reasons for providing a buffer over and above the housing requirement is to ensure delivery of the proposed housing target should some sites not deliver in full during the plan period. There was always some uncertainty regarding the delivery rates assumed on these sites given their dependency on the Department for Transport's A3 Guildford

scheme and the expected timescales for implementing it. With this in mind, and through continued discussions with the site promoters, we considered the more robust approach would be to assume more realistic phasing, with delivery of part of these sites beyond the plan period (300 homes on each site).

- 4.33 It is worth noting that assuming a longer phasing profile beyond 2034 has not reduced the supply expected to come forward from these sites in the early years of the plan period. It is also important to note that whilst we are assuming a more conservative and realistic delivery rate in the housing trajectory, there is no attempt to artificially constrain each site's delivery should the market and the necessary infrastructure improvements enable them to be built earlier. They are not proposed to be designated as 'safeguarded' land, which would require a Local Plan review to bring forward the additional land.
- 4.34 Given the identified unmet need arising from Woking is up until 2026/27, the potential surplus from these sites cannot contribute towards meeting it as all the units being delivered prior to 2026/27 are necessary to meet Guildford Borough Council's OAN.

Applying constraints

- 4.35 The preparation of the new Local Plan has been an iterative process. As a result, there are inevitably significant changes between the different consultation versions to reflect updated evidence base, ongoing cooperation with our partners and consideration of consultation responses. The changes are also a result of a greater understanding of constraints, which limit or shape development opportunities and influence our overall spatial strategy.
- 4.36 The draft Local Plan (July 2014) included the preferred spatial hierarchy as part of Policy 2. This set out the order of preference in terms of the type of locations we would wish to direct growth to. This hierarchy remains the most sustainable options for growth and has therefore remained the hierarchy through to the Submission Local Plan.
- 4.37 It is important to note that whilst we have sought to maximise development opportunities higher up the hierarchy, there is a point within each option when the harm associated with providing additional development significantly and demonstrably outweighs the benefits of providing more homes within this type of location. This can be due to the impact that it might have on character or the ability of the supporting infrastructure to cope with additional growth. At this point, it is considered more sustainable to move to the next spatial option down the hierarchy and once again assess the contribution that it could make to meeting our development needs before the harm once again outweighs the benefits.
- 4.38 Our spatial hierarchy identifies a brownfield first policy including, where appropriate, previously developed land in the Green Belt. The following spatial options are considered to be the most sustainable locations:
- Guildford town centre
 - Guildford, and Ash and Tongham urban area
 - Inset villages
 - Identified Green Belt villages
 - Rural exception housing
- 4.39 Should these options provide insufficient land to meet our OAN, then these would represent the next options which we would choose to explore:

- Countryside beyond the Green Belt
- Guildford urban extensions
- New settlement at the former Wisley airfield
- Development around villages

- 4.40 We received a considerable level of feedback to the draft Local Plan (2014) consultation which referred to insufficient consideration being given to the harm associated with development and the need for a more stringent application of constraints. In particular, the extent to which Green Belt, flood risk, infrastructure (notably transport) and landscape were capable of being constraints to meeting OAN. As part of preparing the revised LAA that accompanied the Regulation 19 Local Plan (2016), we re-appraised all sites in light of constraints and reconsidered our spatial strategy.
- 4.41 Whilst only sites that are key to the delivery of our strategy are allocated, as required by the NPPF, the LAA identifies all sites that are suitable, available and achievable for housing and economic development uses over the plan period. As a general principle, we consider that sites key to delivering our strategy are those that are in excess of approximately 25 homes or are delivering other specific use classes. Allocation policies provide the opportunity to set out specific requirements and opportunities taking account of the LAA, and other evidence base. Whilst they are not all formally allocated in the Submission Local Plan, all homes identified in the LAA (the LAA has a threshold of five homes or more) have been counted in terms of calculating our supply. In addition to this, our supply also includes assumptions on non-site specific sites, namely windfall and Rural Exception Sites, and information on outstanding permissions and completions.
- 4.42 The Regulation 19 Local Plan (2016) site allocations excluded land that had been granted planning permission. A key change in the Regulation 19 Local Plan (2017) was that site allocations were retained where those sites had planning permission but had not yet commenced construction. The reason for doing so is to ensure that the policy context for these sites is clear should the current planning permission expire or another planning application be submitted. It provides greater certainty for the uses proposed on the site and our ability to count this as part of our supply. It is also more transparent for relevant stakeholders to understand where development is planned to occur.
- 4.43 The NPPF requires us to “boost significantly the supply of housing” (para 47), and “deal with undersupply within the first five years of the plan period where possible” (NPPG, Paragraph: 035 Reference ID: 3-035-20140306). As set out above we do not consider this is possible in Guildford. However, in order to demonstrate that we have sought every opportunity to do so, we set out below why the remaining potential sites options that were previously discounted through the LAA process are not appropriate for additional development.

Green Belt

- 4.44 As set out above, an update to the GBCS included the production of the Green Belt sensitivity map. Each land parcel was colour coded according to the extent to which the land parcel scored against the four Green Belt purposes. The sensitivity map has been used as a starting point for helping to inform the proposed site allocations.
- 4.45 We consider that in general terms there are exceptional circumstances that justify the amending of Green Belt boundaries in accordance with the NPPF, paragraph 83. Our

evidence base identifies a high level of need for market and affordable housing (including traveller accommodation) and employment. Given the extent of Green Belt across the borough (89 per cent) and the lack of sufficient suitable and deliverable sites located outside the Green Belt, to not amend boundaries would lead to a significant undersupply of homes compared to the identified needs – approximately half. The consequences of this within Guildford would be to exacerbate the existing affordability issues and have an adverse impact on economic growth in the area, which would lead to unsustainable commuting patterns. Each addition or removal to the Green Belt is also separately considered below and in the Green Belt and Countryside topic paper.

- 4.46 The draft Local Plan (2014) treated all PDAs as reasonable options for development regardless of the extent to which the land parcel within which it sits scored against Green Belt purposes (as shown on the sensitivity map). However, following the feedback from consultation and the new evidence available, we reconsidered how Green Belt is used as a constraint. The Regulation 19 Local Plan (2016) sought to give weight to the sensitivity of the Green Belt parcel within which each PDA is located. Whilst PDAs have been identified on the basis that they would not fundamentally harm the main purposes of the Green Belt, there would nevertheless be, in relative terms, more harm caused by allocating sites within land parcels assessed as contributing more towards the purposes of the Green Belt than those judged to be of lesser Green Belt value. In giving greater weight to the sensitivity of the Green Belt, we have therefore sought to ameliorate the consequent impacts on the Green Belt as much as is reasonably possible.
- 4.47 However, given the shortfall early in the plan period and unmet needs within the HMA, we consider that it is still necessary to consider the potential of each PDA regardless of its Green Belt sensitivity. This is discussed further below.

Landscape

- 4.48 The southern half of the borough is designated as part of the Surrey Hills Area of Outstanding Natural Beauty (AONB). The NPPF affords this land the highest status of protection (paragraph 115). There is also land adjacent to the AONB that is currently designated as an Area of Great Landscape Value (AGLV). This designation stretches across Surrey. As part of applying constraints, we have considered both the AONB and AGLV, and the impact that development might have on them.
- 4.49 There is a current commitment by Natural England to undertake an AONB boundary review. A study has been undertaken by landscape consultants Hankinson Duckett Associates, through Surrey County Council, reviewing the Surrey Landscape Character Assessment and looking for candidate areas within the AGLV that contribute to natural beauty. The study identifies a number of recommended additional areas of Surrey Hills AONB and one secondary potential additional Area of Surrey Hills AONB within Guildford borough. Whilst the identification of the candidate areas do not result in this land having increased AONB status, it does nevertheless indicate the likely areas which are of high value and may potentially in the future benefit from increased protection. However, it is important to note that the candidate areas and individual boundaries should not be considered definitive until the review has been formally progressed through the statutory process. The AGLV designation, and the level of protection this affords, will therefore remain until such time as the review is complete. None of the proposed site allocations are located in candidate AONB areas.

- 4.50 The NPPF states at paragraph 116 that *“Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:*
- *the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;*
 - *the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and*
 - *any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.”*

4.51 Further discussion regarding how landscape considerations have influenced the proposals within the Submission Local Plan (2017) is set out below.

Flood risk

4.52 The NPPF and NPPG require sequential and, if necessary, exception tests to be carried out when development needs cannot all be accommodated in areas at low risk of flooding (flood zone 1). As shown in the flood risk sequential test (see Level 1 SFRA), we are not able to meet our development needs using only land in flood zone 1.

4.53 If, having considered spatial options in the Sustainability Appraisal, some development has to be located in areas at medium or high risk to meet development needs, the exception test is applied, where required.

- 4.54 For the Exception Test to be passed:
- 1) it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by a Strategic Flood Risk Assessment where one has been prepared; and
 - 2) a site-specific flood risk assessment must demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall

4.55 The exception test is applied at this stage, however, it is considered in full during the determination of a planning application, and passed at that stage. Part 1 has regard to the SFRA and the Sustainability Appraisal, and is considered at this stage. It is passed upon adoption of the Local Plan. Part 2 is a technical assessment for which the Level 2 SFRA provides information and an indication of the likelihood of a development proposal being able to pass the exception test. The detail is considered when a development proposal is submitted for determination.

4.56 Some types of development are simply not appropriate in areas of high flood risk. The table below is an extract from the NPPG

Flood zones	Flood risk vulnerability classification				
	Essential infrastructure	Highly vulnerable	More vulnerable	Less vulnerable	Water compatible
Zone 1	✓	✓	✓	✓	✓

Zone 2	✓	Exception Test required	✓	✓	✓
Zone 3a	Exception Test required †	X	Exception Test required	✓	✓
Zone 3b	Exception Test required *	X	X	X	✓*

✓ Development is appropriate

X Development should not be permitted.

Further criteria apply (* and †), which can be viewed in the NPPG (Paragraph: 067 Reference ID: 7-067-20140306).

- 4.57 Any development proposals in flood zone 2 and 3 are subject to sequential testing, even though the development proposals may be appropriate (in accordance with the table above). Para 101 of the NPPF says, “*The aim of the Sequential Test is to steer new development to areas with the lowest probability of flooding. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding.*”
- 4.58 New homes are a more vulnerable use, and this table clearly states that new homes in flood zone 3b should not be permitted. Regardless of any design solutions, this is an in principal policy objection. Equally, proposals for new homes in Flood zone 3a would be subject to the sequential and exception test, demonstrating in essence that there are no reasonably available appropriate alternative sites at less risk of flooding, that there are wider sustainability benefits of the development to the community that outweigh flood risk, and that the development will be safe for its lifetime, without increasing flood risk elsewhere.
- 4.59 Avoiding release of Green Belt land is not a justified reason to provide development in areas of high flood risk. This is well documented in the inspector’s report of the examination of Doncaster LDF Sites and Policies Development Plan Document (2014).

“From the evidence before me, it is difficult to avoid the conclusion that the Council has chosen for allocation a number of sites to which it has a long-term commitment for the delivery of its regeneration efforts and has simply decided that these sites are so important to its efforts that this, by itself, is sufficient to provide the wider sustainability objectives and benefits required by the NPPF tests. I do not consider that this can be assumed. The NPPF tests ‘set a high bar’. It is only where it is ‘not possible’ to direct development to areas of lower flood risk that the Council can move on to apply the Exceptions Test. The test is not that it would be preferable to locate development in the areas of highest risk of flooding but that it should be impossible to do otherwise.

There may be circumstances where it is genuinely ‘not possible’ to avoid allocating land which is subject to a high probability of flood risk if the settlement-specific strategy of the Core Strategy is to be followed. However, even in the rare instances where this may be the case, I would suggest that this could be an indicator that the strategy could need some re-assessment rather than that sites at risk of flooding should be selected.

In my opinion the Council's approach to the selection of sites in areas of higher probability of flooding has been too inflexible. It has not given due consideration to the alternatives of developing in the countryside or even in the Green Belt in order to avoid making allocations in areas of flood risk. Overall, I do not consider that the Council has made a proper and thorough examination of the issue of flooding before deciding that the risks involved are outweighed. In any event, the Exceptions Test has not been applied in that a site-specific flood risk assessment has not been undertaken as is required by the NPPF." (paragraphs 44-46).

- 4.60 The Level 2 SFRA identified two site allocations at most concern from flood risk – however these are not proposed for new homes, and more commentary is provided in the Flood Risk topic paper. The scores for sites allocated for new homes ranged from 3-5 (medium to low concern).
- 4.61 The Submission Local Plan has given due regard to national flood risk policy, and has not allocated land for housing development that does not accord with the flood risk compatibility table, or pass the sequential test. Whilst further consideration of the exception test is needed at planning application stage, the exception test at this stage has been applied.
- 4.62 This process has resulted in sites that were proposed to be allocated in the draft Local Plan (2014) not being allocated in the Submission Local Plan. This is primarily because they have not passed the sequential test, and that there are reasonably available appropriate alternative sites at less risk of flooding, to provide sufficient development to meet identified needs, and/or the proposed use does not accord with NPPG Table 3 (Flood risk vulnerability and flood zone compatibility).
- 4.63 For information on Policy P4 Flood Risk, see the Flood Risk topic paper.

Guildford town centre

- 4.64 Guildford town centre is a sustainable location for development, and is at the top of our spatial hierarchy. In total, we consider that this source of supply is likely to generate 1,221 homes to 2034.
- 4.65 The quantum of homes is less in Guildford town centre in the Proposed Submission Local Plan, than in the draft Local Plan (2014). This is following a re-appraisal of sites in light of constraints, particularly with regards to flood risk (as documented above) which has impacted on the inclusion of sites close to the River Wey, in the Walnut Tree Close area. Whilst wider Council work continues in partnership with the Environment Agency, to consider flood risk alleviation schemes for Guildford town centre, and flooding solutions for specific sites, at present, there is not a viable and deliverable alleviation scheme that could lessen the flood risk in these areas. Outside of the Local Plan process, we have a Major Projects team who are working to unlock the potential delivery of further sites through the Council's Regeneration Strategy (2017). Additionally allocations could be made through a Town Centre Area Action Plan (which the Council is considering preparing should it be needed), or a partial review of the Local Plan. However, given the timescales involved, this is not imminent. Further, should new homes be delivered on land that is at high risk of flooding through a planning application or prior approval, the homes would contribute towards supply as windfall. There are subtle differences between the tests for planning applications and prior approvals in relation to flood risk, than allocation of

sites in the Local Plan, and there remains the possibility of windfall development on sites that are considered unsuitable for allocation in the Local Plan.

- 4.66 There are also deliverability concerns on some sites which have been removed from the plan. For example, Guildford library as the loss of this use would not be acceptable without a suitable alternative available site that would meet the specific requirements of this facility. In addition to this and as set out above the Telephone Exchange has also been removed on the basis of availability and deliverability concerns.
- 4.67 Also, since 2014 some sites have been permitted or developed, for example, 1-2 Station View, Guildford Park Car Park and Buryfields House, and therefore these homes are counted in the housing trajectory as completions since 2015 or outstanding permissions.
- 4.68 To further maximise delivery in this sustainable location we have increased the allocation in the Regulation 19 Local Plan (2017) for a number of sites including North Street (200 homes to up to 400 homes), The Plaza (70 up to 90) and Jewsons (125 up to 175). Furthermore, another significant change within this spatial option is that the LAA (2017) now identifies a further development opportunity at White Lion Walk (LAA site number 2370) for 50 homes.

Guildford urban area

- 4.69 Guildford urban area is a sustainable location for development, and is a preferred area to focus growth in our spatial hierarchy. In total, we consider that this source of supply is likely to generate 1,399 homes to 2034 (including Slyfield Area Regeneration Project, but excluding Guildford town centre).
- 4.70 The quantum of homes is less in Guildford urban area in the Submission Local Plan, than in the draft Local Plan (2014). This is following a re-appraisal of sites in light of constraints. As documented above, flood risk constraints apply in Guildford urban area too, as one of the areas of likely future change (Walnut tree Close) is partially at high risk of flooding, and is part within Guildford town centre and part Guildford urban area (as one travels north). A further loss in the Regulation 19 Local Plan (2017) is the site at Guildford College for 100 homes. As set out above this site is now being progressed for student accommodation instead.
- 4.71 The Council carried out a comprehensive review of all HRA land (Housing Revenue Account) in the borough, with a particular focus on garage sites, to assess the potential for housing development (including traveller accommodation). A total of 100 Council owned sites were assessed; first as a desk top exercise, and then via site visits to 28 sites which, following the desk top exercise, were considered to have development potential. Following the site visits, a further 12 sites were rejected. The SHLAA (2014) included garage sites as potential development sites. However, since then, some have gained planning permission and others have been rejected.
- 4.72 There are a range of reasons that sites are considered unsuitable or unachievable, many of which are specific to that site. This is particularly more common on previously developed sites in already developed areas. An example is Merrow depot which was previously listed as available for development, but is required to accommodate its current use and without a suitable relocation option that could meet the specific requirements of this facility, is not a deliverable site for new homes.

- 4.73 The primary need for development over the plan period is housing (C3 use). Where suitable sites exist in sustainable locations, particularly those in the town centre or urban area at low risk of flooding, the priority is the provision of new homes (C3 use) as this is considered a higher priority than the provision of purpose built student accommodation (sui generis use). Some sites in Walnut Tree Close are being promoted by developers/land owners for purpose built student accommodation due to the road's close proximity to the university. However, given the recent completion of student accommodation in this area we consider that the priority, where possible, is for C3 housing, which does not preclude occupation by students. The need for further general market housing due to student growth (as identified in the SHMA) is included in our objectively assessed housing figure and is being met in the Submission Local Plan through the delivery of C3 housing.

Slyfield Area Regeneration Project (SARP)

- 4.74 This site has been identified as a proposed allocation in each version of the plan. This is a proposed strategic development site, delivering approximately 1000 homes on a previously developed site in Guildford urban area. Consistent with the approach taken with Blackwell Farm and Gosden Hill, described above, this site has an overall capacity of approximately 1,500 homes, but these are likely to be delivered beyond this plan period. The delivery of this site is dependent upon the relocation of the current Sewage Treatment Works and for this reason is not expected to begin delivering homes until the latter part of the plan period.

Ash and Tongham urban area

- 4.75 Ash and Tongham urban area is a sustainable location for development, and is a preferred area to focus growth in our spatial hierarchy. However, this area is already very developed with primarily residential uses, and there are very limited opportunities for growth. This is reflected in the total that this source of supply is likely to generate; 54 homes to 2034.
- 4.76 The draft Local Plan (2014) Table 1 did not distinguish between Ash and Tongham urban area and Ash and Tongham strategic location of growth. Therefore the figures are not comparable. However, there were two proposed site allocations in Ash and Tongham urban area in the draft Local Plan (2014) which do not feature as site allocations in the Submission Local Plan. One is Ash Vehicle Centre, for which there are availability concerns (the site is occupied by businesses and is not currently known to be available for development). The second is the Public House, Oxenden Road, Tongham, which remains a realistic candidate for development in the LAA, but is not of a sufficient size to warrant allocation.
- 4.77 Small development sites that are not identified in the LAA may continue to come forward in this area and provide new homes over the plan period. If so, they will count as windfall.
- 4.78 Sites were discounted in this area primarily due to proximity to the Thames Basin Heaths SPA (within 400m where residential development is not suitable) and the identification as a strategic employment site in the ELNA, recommending their retention for that use, rendering a change to residential use unsuitable.

Inset villages and infill development within identified Green Belt villages

- 4.79 Previous Green Belt policy was contained within Planning Policy Guidance 2 (PPG2). This has been superseded by the NPPF. Whilst the NPPF broadly represents a continuation of previous policy, there has been a significant change in the policy approach to villages. PPG2 had previously enabled a choice to be made as to whether villages should remain washed over by the Green Belt or whether they should be inset (or removed) from the Green Belt. This is in contrast to the NPPF, which requires all those villages that do not contribute towards the openness of the Green Belt to be inset (paragraph 86, see below). Insofar as exceptional circumstances are required in order to amend Green Belt boundaries, the change in policy approach together with the detailed consideration of each village provides the justification for this. A number of authorities have already chosen to inset their villages under the previous policy although Guildford did not. Given that this flexibility in approach has now been removed, we must consider this requirement as we prepare our new Local Plan.
- 4.80 NPPF, paragraph 86 states:
- “If it is necessary to prevent development in a village primarily because of the **important contribution** which **the open character of the village** makes to the **openness of the Green Belt**, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt”.*
(emphasis added)
- 4.81 As part of considering this paragraph, it is important to note that there are two aspects to it. The first is to consider whether the village does (or does not) have an open character. The second consideration is whether this open character makes an important contribution to the openness of the Green Belt. It therefore follows that merely fulfilling the first part of the paragraph, and exhibiting a somewhat open character, does not necessarily justify remaining washed over by the Green Belt.
- 4.82 It is also important to note that the decision to inset is based on the contribution that the village, as it stands today, makes to the openness of the Green Belt. This is based on the current built up nature of the village, its relationship to the open Green Belt countryside beyond and the presence of defensible boundaries. It is not based upon whether the village has been identified as having PDAs around it. Rather, the extent to which extensions to villages can contribute to meeting OAN is considered below – further down our hierarchy.
- 4.83 Based on the findings of the GBCS, Volume IV, the Proposed Submission Local Plan identifies the following villages to be inset from the Green Belt: Chilworth, East Horsley, Effingham, Fairlands, Flexford, Jacobs Well, Normandy, Peasmarsh, Ripley, Send, Send Marsh/ Burnt Common, Shalford, West Horsley and Wood Street Village.
- 4.84 Insetting these villages creates some development opportunities where previously they would have been considered inappropriate development in the Green Belt. It is important to note that, as set out in paragraph 86 of the NPPF, development will still be managed by other development management policies. This includes for instance consideration of character, setting of listed buildings, access, and so on. Following feedback to the draft Local Plan (2014) consultation, the Proposed Submission Local Plan (2016) includes a new designation of Open Space (Policy ID4). This covers all types of open space of public value, both public and private, of public sport/recreation and/or amenity value. This designation is in response to concern that the removal of

Green Belt protection will lead to development on land that is of public value. Policy ID4 protects Open Space in line with national planning policy to ensure that the value for which the space has been identified is retained.

- 4.85 In addition to this designation, the Submission Local Plan also includes a policy on character and design of new development (Policy D4). This ensures that all new development is of high quality design. Specifically it also requires that within villages it is particularly important that, in addition to good design, due regard is given to the protection of important views and that the transition between built form and surrounding countryside is respected.
- 4.86 Within those villages that are proposed to remain washed over, limited infilling is appropriate in the Green Belt. The meaning of limited infilling in villages has recently been clarified through the Court of Appeal (see further detail in the Green Belt and countryside topic paper). This found that a settlement boundary in a local plan is not conclusive as to whether or not a site is considered to be in the village. The Submission Local Plan lists all settlements that we consider to constitute a village. We have continued to identify a settlement boundary around those villages where the character and nature of the village mean it would be beneficial to do so, whilst acknowledging that this is not definitive and is merely a starting point for any decision maker.
- 4.87 As set out above, the most significant change within this spatial option that occurred is the removal of A36 (Hotel at East Horsley) due to the loss of the hotel use.
- 4.88 We consider that this source of supply is likely to be at least 426 homes over the plan period.

Rural exception housing

- 4.89 Rural exception sites can continue to come forward regardless of the Local Plan, where the policy criteria is met. However, given the amount of affordable housing expected to be delivered by the Submission Local Plan, the quantum of rural exception housing may be less than previously experienced. Whilst some villages are proposed to be extended in the Submission Local Plan, rural exception sites in these villages may still be acceptable and possible, if there is a specific local need identified. Other villages where there are no proposed village extensions, may consider rural exception sites in the future to help provide affordable homes for local people, and help keep local young people/younger families in the village.
- 4.90 Taking account of this, an allowance has been made for six rural exception homes a year, equating to 90 over the plan period, in addition to any delivered as completions prior to adoption of the Local Plan. This is based on previous trends, recognition of proposed extensions to some villages that will provide 40% affordable housing, and forthcoming neighbourhood plans in villages that are not proposed to expand but do wish to provide some small-scale affordable housing for local people.
- 4.91 Rural exception sites are not identified in the LAA, or allocated in the Submission Local Plan, to avoid raising hope value of land. The Council is aware of a small number of opportunities for rural exception housing in the borough, however, would not wish to risk their viability and thus deliverability by identifying them. Instead, a trend based calculation is included.

Previously developed land in the Green Belt

- 4.92 In much the same way as national policy requires that villages should only remain washed over if they make an important contribution to the openness of the Green Belt, we consider a similar approach is applicable to major previously developed sites currently washed over by the Green Belt. National policy requires that land, which it is unnecessary to keep permanently open, should not be included in the Green Belt. If major previously developed sites are of sufficient scale and do not possess an open character, it is not considered necessary for them to remain within the Green Belt.
- 4.93 Whilst the Submission Local Plan identifies a number of major previously developed sites to be inset from the Green Belt, the majority of these are not proposed to be redeveloped for housing. Instead, the process of inseting will merely enable greater flexibility for appropriate intensification or development for the uses that already exist on site.
- 4.94 One site that is proposed to be inset and redeveloped for housing is the Surrey Police Headquarters at Mount Browne. Whilst located within the AONB, the site has existing development on it and therefore, through careful design, the redevelopment of this land would not have any greater impact on the setting of the AONB.
- 4.95 The Submission Local Plan also proposes to inset the University of Law and allocate the existing car park for student accommodation. This site is also located within the AONB. Whilst this site is elevated, it is well screened by vegetation. We therefore consider that development here is appropriate, as it is capable of being sensitively designed to minimise any adverse impact on surrounding views and the setting of the nearby listed building.
- 4.96 As set out in more detail above, a significant change within this spatial option is the removal of (A34) Broadford Business Park in Shalford as this site is being protected for its existing employment use instead.
- 4.97 Furthermore, another significant change within this spatial option is that the LAA (2017) now identifies a further development opportunity at Send Prison (LAA site number 2366) for 150 homes.
- 4.98 In total, we consider that this source of supply is likely to generate 395 homes to 2034.

Ash and Tongham

- 4.99 We have a small amount of countryside land beyond the Green Belt in the west of the borough near Ash and Tongham. This is not Green Belt, and currently forms 2% of the borough. Given its non-Green Belt status, this land is higher up the hierarchy and we have sought to maximise sustainable opportunities for growth in this area as part of trying to meet OAN.
- 4.100 The draft Local Plan (2014) proposed an extension to the Green Belt south of Ash and Tongham, into land currently designated as Countryside beyond the Green Belt (CBGB). This extension covered GBCS land parcel K3 (see appendix 1 for an extract from the GBCS indicating the different land parcels) which was assessed to perform well against the Green Belt purposes (3 out of 4 purposes). We considered that this together with the factors outlined further below constituted the exceptional

circumstances to justify amending the Green Belt boundary in this area, as recommended in Volume II.

- 4.101 In order to provide a degree of separation between Ash and Tongham urban area and Ash Green, the draft Local Plan (2014) also proposed an 'area of separation' within the remaining area of land parcel K5 not identified as a PDA. This area was also recommended as new Green Belt in the GBCS (Volume II) in spite of only scoring 2/4 of the main purposes. Also included within the area of separation was part of land parcel K8 (west of White Lane/Foreman Road) and K6 (north of the dismantled railway line), both identified as part of wider PDAs in the GBCS. On balance, it was considered that the benefit of providing a relatively small number of additional homes in this area did not outweigh the harm associated with extending Ash and Tongham urban area to incorporate Ash Green village. Identifying this land as an area of separation sought to preserve the undeveloped part of this area thereby maintaining a visual degree of separation.
- 4.102 Whilst this area of separation did include some existing ribbon development along Ash Green Road, which does form part of Ash Green village, this area is physically separate from the village core to the south of the dismantled railway. Whilst this ribbon development forms part of Ash Green village, once the strategic site around Ash and Tongham is built out and extended towards the northern tip of Ash Green, this area is likely to functionally and visually look more towards Ash and Tongham urban area.
- 4.103 Following our reappraisal of sites and our spatial strategy, we looked again at how we could achieve sustainable development within Ash and Tongham whilst maintaining the separate identity of Ash Green village. We still consider that Ash Green Road will functionally and visually look towards the expanded Ash and Tongham urban area once it is built, and therefore continue to propose that this land, up to the dismantled railway, be included in the Ash and Tongham urban area instead of identified as an area of separation. We nevertheless wish to acknowledge that this area does form part of Ash Green village. For this reason whilst it is proposed to be included within the Ash and Tongham urban area, site allocation A29 requires that proposals for the land west of Ash Green Road should respect the historical context of this area. It also requires the provision of an appropriate green buffer to maintain a sense of separation between it and the properties along Ash Green Road.
- 4.104 Regarding the PDA south of the dismantled railway, we still consider it appropriate to maximise the use of CBGB land where it is sustainable to do so. For this reason, we still propose to allocate the small site to the east of White Lane (site allocation A28). Given the location of this site and the visual and physical connection it already has with the land north of the dismantled railway, it is also likely to look towards the urban area once it has been built up to the railway line. Accordingly, this land is also included within the Ash and Tongham urban area.
- 4.105 Following the reassessment of all land parcels in light of the revised methodology (Volume II addendum) K3 is now assessed to score 2/4 of the Green Belt purposes and K5 is assessed to score 3/4. Further work undertaken in Volume V of the GBCS also now identifies part of K3 as a PDA for approximately 600 homes which is discussed further below. Further identification of PDAs on CBGB was undertaken in order that we could fully understand the growth opportunities on non-Green Belt land and the extent to which this land could potentially help meet our OAN.

- 4.106 We still believe that there is strong merit and good planning reasons in seeking to maintain a degree of separation between Ash and Tongham urban area and the core of Ash Green village. We also consider that the additional PDA in K3 is not appropriate for development. Whilst developing CBGB appears higher in our spatial hierarchy, we do not consider it appropriate to allocate any further development above that already proposed in CBGB. Due to the lesser degree of protection that CBGB currently affords together with the fragmented ownership of this land, development within the CBGB is already and will continue to be delivered in a piecemeal way.
- 4.107 This small scale and incremental approach to development means that homes are being delivered here without the other mix of uses and supporting infrastructure that sites of this overall scale would normally deliver. This is particularly due to our current inability to pool contributions until we have a Community Infrastructure Levy (CIL) in place. We expect that planning applications in this area are likely to continue to come forward ahead of the new Local Plan and accompanying CIL, which will further exacerbate this issue.
- 4.108 In addition to this, this land is located within the AGLV and therefore has landscape value that we wish to protect. For these reasons, whilst Ash and Tongham urban area is second in the settlement hierarchy, further development above the level already proposed is not considered to be appropriate. The harm associated with providing more homes here is considered to significantly and demonstrably outweigh the benefits of doing so.
- 4.109 For these reasons, the Proposed Submission Local Plan retained all of K3 as new Green Belt and proposed an extension to this. The GBCS (Volume II) recommends that the remainder of land parcel K5, not identified as a PDA, up to the dismantled railway line should be designated as Green Belt. This is further justified given Volume II addendum now assesses this land to fulfil three out of the four Green Belt purposes. We therefore considered it appropriate to extend the proposed Green Belt boundary to include this land. The dismantled railway forms a strong, defensible and easily recognisable Green Belt boundary. Extending the designation to cover this area will prevent the merging of Tongham with Ash Green, checks the unrestricted sprawl from these areas and safeguards the countryside from encroachment.
- 4.110 As a result of the above proposals, the only remaining non-Green Belt land was a wooded area between the proposed southern edge of the revised Ash and Tongham urban area and north of the main built up area of Ash Green (south of Ash Green Lane East). Given the need to protect the separate identity of Ash Green village, we consider there are exceptional circumstances to warrant the extension of the Green Belt further to cover the area of land north of the village core. This would join the Green Belt which currently already extends up the eastern side of Ash Green village and which is proposed (as set out above) to extend up the western side. Doing so would also serve to maintain the visual and physical separation that currently exists as one travels up White Lane. The Green Belt extension here would follow the dismantled railway and the southern boundary of site allocation A28, discussed above. These features all constitute defensible boundaries. It is also consistent with the NPPF which states that when amending Green Belt boundaries we should ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development.
- 4.111 The only change in the Regulation 19 Local Plan (2017) was an amendment to site area for A28 which was increased slightly to the west and south. The reason for

expanding the western boundary was to abut the edge of the road so as to ensure that the site could gain suitable access and did not need to go through land now proposed to be Green Belt (thereby negating the need to demonstrate very special circumstances). The southern expansion was in order to ensure that the site boundary followed a defensible boundary that could also serve as an appropriate Green Belt boundary. The additional land to the south consists of Ancient Woodland and is therefore not developable. For this reason the capacity of the site remained unchanged.

Ash and Tongham strategic location of growth

- 4.112 This refers to land that forms an extension of Ash and Tongham urban area (Site allocation policy A29), and the site allocation to the north of Ash Green (Site allocation policy A28).
- 4.113 In total, we consider that these two sites are likely to generate a further 1,125 homes to 2034 (1,063 homes at A29 and 62 homes at A28).
- 4.114 This figure has been calculated looking at individual land ownership, checking availability and considering planning history. Where there is no planning history, a density similar to other sites with planning permission has been used.
- 4.115 However, this figure does not represent the full scale of growth in this area, as a considerable amount of land already has the benefit of planning permission. There are currently 681 homes with planning permission but not yet delivered on land that is currently CBGB. As set out above, the Submission Local Plan allocates permissions that are not yet under construction. For this reason, A29 is allocated for approximately 1,750 homes. As set out above there are 1,125 homes on land yet to get permission plus 681 homes with permission. In addition, since the base date of the Local Plan (2015), 24 homes have been completed. Added to 681, this equals 705 homes, making a total of new homes in this area 1,830.
- 4.116 In the wider Ash and Tongham area, add to this the number in Ash and Tongham urban area (54 homes) and the recent permission on the southern Ash Green site for 58 homes (Site allocation policy A27), this equals to 1,942 homes.
- 4.117 The number of homes proposed in this area roughly compares to the number of homes proposed at former Wisley airfield (2,000 homes), but without much of the supporting uses and infrastructure. The piecemeal nature of this site in terms of its fragmented ownership and how it is being delivered, in part ahead of the Local Plan without CIL, means housing is being provided without many of the additional benefits.

Rejected site

- 4.118 Volume V identified a further PDA in the area within land now proposed to be designated Green Belt. This site is located south of Tongham, has capacity for approximately 600 homes, and is located within land currently designated as an Area of Great Landscape Value (AGLV). This land is designated in recognition of its landscape value and role in buffering the Surrey Hills Area of Outstanding Natural Beauty (AONB). There is a commitment by Natural England to undertake an AONB boundary review in early 2018. The Surrey Hills AONB Natural Beauty Evaluation Report carried out by Hankinson Duckett Associates (October 2013) identifies a number of AONB candidate areas. Part of land parcel K3 is recommended for AONB inclusion, although this does not extend into the PDA. However, the candidate areas

and individual boundaries should not be considered definitive until the review has been formally progressed through the statutory process. The identification of this land as an AONB candidate area does not give it AONB planning status. However, the AGLV, as a local designation present across many Surrey authorities, will remain until such time as the AONB boundary review is complete. It is therefore a consideration when assessing where development should be located.

- 4.119 For the reasons set out, we consider that the harm associated with additional growth in this area would significantly and demonstrably outweigh the benefits. We therefore consider that we should instead assess the next development option in the spatial hierarchy, namely the strategic sites around Guildford urban area, given that these sites will benefit from and facilitate a greater level of supporting infrastructure, which serves to potentially outweigh some of the harm associated with Green Belt release. However, given its non-Green Belt status and preference in the spatial hierarchy, it is considered appropriate for SA testing purposes to include the site south of Tongham for 600 homes within the alternative spatial strategy that seeks to meet some of the unmet needs within the HMA.

Guildford urban extensions

- 4.120 As set out above, further work was undertaken in relation to Green Belt sensitivity to inform the Regulation 19 Local Plan (2016). The GBCS split the entire borough into land parcels. These were drawn on the basis that they were physically and visually contained, and surrounded by clear physical features capable of forming appropriate and defensible Green Belt boundaries. All land parcels have been assessed against the four main purposes of the Green Belt to understand the contribution they make to the purposes of the Green Belt. Given the PDAs identified around Guildford urban area are all of a strategic nature and consist of the entire land parcel, Volume II of the study originally sought to only explore the potential development opportunity on those land parcels which scored two or less against Green Belt purposes. Volume II addendum, commissioned after a review of the evidence base methodology in 2014, expanded the area of search to include all land parcels adjacent to Guildford urban area irrespective of their Green Belt score.
- 4.121 The following is an extract from GBCS Volume II addendum, paragraph 4.4, which explains the rationale for doing so and the Green Belt sensitivity assessment that was prepared:
- “The Green Belt purposes sensitivity information can be used by the Council to guide development to the less sensitive areas, but will inevitably be influenced by other background information, including the Council’s chosen spatial strategy, confirmed growth requirements and how the Council interprets the requirement to meet their objectively assessed housing needs. For this reason, Potential Development Areas have been identified, and retained, within some mid and higher sensitivity parcels. This does not imply that all such areas should be allocated for development within the Council’s subsequent Local Plan Document, but identifies those areas that might be appropriate if there is a need to introduce development to those more sensitive parts of the Green Belt in order to meet the Council’s growth requirements.”*
- 4.122 Given the PDAs around the urban areas consist of the entire land parcel, there would be greater subsequent harm to the Green Belt should these sites be allocated when compared to the other urban extensions that are located on land assessed to be of lesser sensitivity. However as already stated, Green Belt sensitivity is not the sole

determining factor. Instead, other sustainability and environmental factors are considered alongside the Green Belt harm to determine whether exceptional circumstances exist to warrant the allocation of further sites in spite of greater Green Belt harm.

- 4.123 As a starting position we have sought to protect land which has been assessed as high sensitivity Green Belt. We therefore consider it appropriate to exclude in the first instance any sites that fall within a red (high sensitivity) land parcel. There are no green (low sensitivity) sites and the two strategic yellow (medium sensitivity) sites that that are proposed to be allocated are both of a scale that enables the delivery of a greater level of supporting infrastructure as part of a mixed use development.

Blackwell Farm

- 4.124 This site was identified in the draft Local Plan (2014) and consisted of land parcels H1 and H2 (see appendix 2 for an extract from the GBCS indicating the different land parcels). However, land parcel H1 is categorised as highly sensitive red Green Belt and is located partly in the AONB and entirely within the Area of Great Landscape Value (AGLV). Development on this land parcel would have had a major impact upon the openness of the Green Belt and the valued landscape, particularly in terms of the setting of the ancient woodland from the Hogs Back.
- 4.125 Following a re-appraisal of this site for the Regulation 19 (Local Plan (2016)), the site was reduced to only include the northern part of the site as the developable area (land parcel H2). The northern land parcel is outside the AONB and only a very small corner is designated AGLV. We do not consider the development of the site will have a significant impact on the AGLV. It is on the very edge of the site adjacent to open countryside and, as required by policy D4 and site allocation A26, the design of the site will need to respond to the transition from urban to countryside. This reduced the capacity of the site by approximately 650 homes.
- 4.126 The Regulation 19 Local Plan (2016) also included a small proposed extension to the north west of the site, near the railway line, into land parcel H4. The reason for doing so is that the remainder of the site, with the exception of the proposed research park extension, drains naturally to a culvert under the railway close to the northern edge of this proposed extension. Whilst balancing and attenuation features will be necessary throughout the site to provide sustainable drainage systems, an attenuation feature is necessary in direct association with this culvert. As a piece of necessary infrastructure to support the delivery of the site, we consider it is appropriate to extend the Green Belt boundary to include this field as part of the urban extension. Avoiding the need for part of the planning application to include development within the Green Belt will help ensure the site is deliverable. The extension to the site increased the capacity of the site by approximately 200 homes. Due to the presence of defensible boundaries and the visual containment of the proposed extension, we do not consider that this would harm the main purposes of the Green Belt and the benefits of doing so would therefore outweigh any harm.
- 4.127 The site will also provide a range of other uses that benefit the future occupants and the wider community, and provide or contribute towards a significant level of infrastructure. This includes traveller pitches, a new local centre with associated community and retail uses, a primary school, a significant expansion of the Surrey Research Park, Suitable Alternative Natural Greenspace (SANG) and other open space, the western route section of the Sustainable Movement Corridor on the site and a necessary and proportionate contribution to delivering this on the Local Road

Network linking the site to the town centre and beyond, and a necessary and proportionate contribution to delivering the Guildford West (Park Barn) railway station. A significant change since the Regulation 19 Local Plan (2016) is that the site is now also accommodating an up to six form entry secondary school. The secondary school will be located to be accessible to both occupiers of the site and the existing urban area of Guildford. The playing fields are proposed to be located outside the site within the Green Belt but will remain easily accessible to the secondary school. Doing so ensures the efficient use of land, thereby minimising the quantum of land to be removed from the Green Belt, and is consistent with the NPPF which requires that we plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access and to provide opportunities for outdoor sport and recreation.

- 4.128 A particular benefit of allocating Blackwell Farm is that it enables an extension to the Surrey Research Park which is key to meeting our OAN for employment. It is also a unique opportunity that enables us to build on knowledge-based employment that is of regional significance. This is strongly supported by the Enterprise M3 Local Enterprise Partnership (EM3 LEP) as it aligns strongly within their ambitions for innovation and enterprise across the Enterprise M3 LEP area, particularly around the development of 5G technology for which the University of Surrey is playing a key part. This type of specialist employment could not be provided elsewhere in the borough.
- 4.129 Due to the overall reduction in size, the total capacity of the site has been reduced from 2,250 to 1,800 homes ($2,250 - 650 + 200 = 1,800$). As discussed above, we expect a minimum of 1,500 to be delivered within the plan period. The site requires an access off the A31 and it is proposed to use the existing access road, Down Place, located in land parcel H1. The road is however currently narrow and would therefore require upgrading. This could result in a new road parallel to the existing on the up-hill side of the road. Whilst it does also run through both AONB and AGLV, the impact that the upgrading would have on the landscape can be mitigated through the retention and enhancement of the tree cover already present along its length.
- 4.130 On this basis we consider that the significant benefits of development at this site as set out above outweigh the harm that may be caused by removing this land from medium sensitivity Green Belt. This constitutes the exceptional circumstances required to amend Green Belt boundaries in this location within the context of the reasons outlined in para 4.43 – 4.44 above which justify the necessity of amending the Green Belt boundary in Guildford.

Gosden Hill Farm

- 4.131 This site was also identified in the draft Local Plan (2014) and has remained a proposed allocation. This site is also of a scale (total capacity of 2,000 homes) which will provide other uses that benefit the future occupants and the wider community, and provide or contribute towards a significant level of supporting infrastructure. This includes traveller pitches, a new local centre with associated community and retail uses, a primary school, a secondary school, a new strategic employment site, Suitable Alternative Natural Greenspace (SANG) and other open space. It will also deliver significant transport infrastructure including an improved junction on the A3, a park and ride facility, the eastern route section of the Sustainable Movement Corridor on the site and a necessary and proportionate contribution to delivering this on the Local Road Network linking the site to the town centre and beyond, and land and a necessary and proportionate contribution to delivering the Guildford East (Marrow)

railway station. Proposals for the development of the site should have regard to the potential opportunity to provide an all movements junction of the A3 trunk road. Consistent with the approach taken at SARP and Blackwell Farm, we expect a minimum of 1,700 to be delivered within the plan period.

- 4.132 In order to ensure that the site is of a sufficient scale to deliver the necessary mix and quantum of development alongside the supporting infrastructure, we proposed a small increase to the site in the north-eastern corner along the A3, into land parcel C3 as part of the Regulation 19 Local Plan (2016) (see appendix 3 for an extract from the GBCS). The increase in site size ensures the planned capacity of the site is deliverable at a density which is appropriate for its location on the edge of the urban area. It also enables sufficient land to deliver the scale of associated infrastructure which is greater than that required to mitigate its own impact. In particular, it facilitates the delivery of a four form entry secondary school. The secondary school will provide for sufficient school capacity for needs arising from the planned development of the site and, in combination with the school at Wisley Airfield, provide for the additional educational need arising in the eastern part of the borough.
- 4.133 It is important to note that whilst the Green Belt boundary has been drawn to follow defensible features, the developable area of the extension is smaller. Given the openness of the area of land directly adjacent to the A3, we do not consider it appropriate for this to be developed. Instead, whilst it is proposed to be excluded from the Green Belt, it must stay open as a green buffer helping to maintain the openness along this stretch of the A3 and the sense of separation between Guildford and Send Marsh/ Burnt Common.
- 4.134 In addition to the formal and informal open space which will be delivered within the site, the playing fields and SANG are proposed to be located outside the site within the Green Belt. This will ensure the playing fields are easily accessible to the secondary school which is proposed to be located in the north of the site near the Park and Ride. Doing so ensures the efficient use of land, thereby minimising the quantum of land to be removed from the Green Belt, and is consistent with the NPPF which requires that we plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access and to provide opportunities for outdoor sport and recreation.
- 4.135 On this basis we therefore consider that the significant benefits of development at this site as set out above outweigh the harm that may be caused by removing this land from medium sensitivity Green Belt. This constitutes the exceptional circumstances required to amend Green Belt boundaries in this location within the context of the reasons outlined in para 4.43 – 4.44 above which justify the necessity of amending the Green Belt boundary in Guildford.

Land north of Keens Lane

- 4.136 This site was also identified in the draft Local Plan (2014) and has remained a proposed allocation although its capacity was increased in the 2017 version. This is a small site capable of delivering 150 homes (up from 140 homes previously). Whilst the entire land parcel (J3) is identified as a PDA in the GBCS, the northern part of the PDA extends into the 0-400m buffer of the SPA within which residential development is inappropriate. There are however other uses that may be appropriate and we have considered these as part of the re-appraisal of sites. Subject to satisfactory control of any associated car parking, pets and the mobility of residents, care homes are allowed within the 400m buffer. The West Surrey SHMA: Guildford Addendum

identifies a need for 433 care home bedspaces (C2 use class) in Guildford and this site presents a suitable location for a 60-bed care home which helps utilise land which would otherwise be inappropriate for development. Whilst we have considered the extent to which the remainder of the PDA could help in meeting other identified needs, for example employment or retail (see LAA), we consider that there are other more suitable sites which are preferable to this one. For this reason we do not consider the full PDA suitable for allocation and have instead, using defensible boundaries within the site, allocated a smaller part of it.

- 4.137 On this basis we consider that the benefits of developing this site outweigh the harm that may be caused by removing this land from medium sensitivity Green Belt. This constitutes the exceptional circumstances required to amend Green Belt boundaries in this location within the context of the reasons outlined in para 4.43 – 4.44 above which justify the necessity of amending the Green Belt boundary in Guildford.

Rejected sites

- 4.138 It is important to note that moving through our spatial options to develop our spatial strategy is an iterative process and the consideration of the balance between benefit and harm will depend upon the extent to which OAN is met. If OAN were not met then we would need to reconsider our spatial options, as required by the NPPG, and assess whether the benefits of providing additional land would outweigh the harm associated with them. Whilst we consider as a starting position that development in red (high) sensitivity Green Belt is inappropriate, we still need to assess whether there are particular benefits in doing so which would serve to outweigh the Green Belt harm and justify the exceptional circumstances for removing them from the Green Belt.
- 4.139 Given the unmet need within the HMA and the shortfall in the early part of the plan period, combined with the sustainability merits of development around Guildford urban area, we have considered the extent to which further urban extensions in high sensitivity Green Belt land parcels may help alleviate the issue. These are discussed further below.

Liddington Hall

- 4.140 This site is identified as a PDA with a capacity of approximately 600 homes. The benefits of this site are the contribution that it could make in meeting OAN, and in being over 500 homes would be required to provide two traveller pitches. However, the site is not of a sufficient scale to provide any additional uses apart from housing. It is relatively poorly connected to transport infrastructure compared to the other urban extensions allocated in the Submission Local Plan, particularly given that the scale of development may not have a critical mass to offer any meaningful improvements.
- 4.141 It is acknowledged that due to its location the site is less reliant upon Highways England's A3 Guildford scheme. However, if built, the most direct route to the A3 would be along the A323 and residents from here would add further traffic onto the stretch of A3 running through Guildford that has been identified for improvements as part of Highways England's A3 Guildford Road Investment Strategy (RIS) scheme. Alternative routing to avoid this section of the A3 so that the traffic could join further north would result in circuitous travel patterns adding to existing local road network issues potentially leading to a severe impact. Whilst Blackwell Farm will add some development traffic onto the same congested section of the A3 and is assumed to be

delivered in part in the earlier years leading up to delivery of the A3 Guildford RIS scheme, it is considered that this is facilitated by a combination of sustainable transport schemes and the site's additional access from the A31 with a controlled through connection to Egerton Road which would help alleviate current congestion in this area and provide some 'headroom' capacity on the A3 prior to the RIS scheme being delivered. In contrast, we have no evidence that the development at Liddington Hall would be able to provide any short-term alleviation and any development here would therefore reduce any existing and freed up 'headroom' capacity on this stretch of A3. We therefore consider that the total delivery within the first ten years of the plan until the A3 Guildford RIS scheme is delivered is unlikely to be increased through the allocation of this site, given the potential for a severe impact on the A3. We consider that this, together with the harm that it would cause to this highly sensitive area of Green Belt, make the site unsuitable for allocation within this Local Plan.

Clandon Golf

- 4.142 This site is identified as a PDA with a capacity of approximately 1,000 homes and due to its location with direct access to the A246 is less reliant upon Highways England's A3 Guildford scheme. The benefits of this site are the contribution that it could make in meeting OAN, and would also be required to provide four traveller pitches. Whilst the site is also being promoted on the basis that it is able to provide other associated supporting uses we consider that our need for these uses are able to be better met on other sites. This includes:
- Secondary school provision to help meet identified needs in the eastern half of the borough - Surrey County Council consider that a combination of secondary schools – one on Gosden Hill Farm and one on former Wisley airfield is preferable to one at Clandon Golf.
 - Employment provision – we are seeking to meet our full employment needs and consider that this is better met on the other strategic sites. The extension to the Surrey Research Park is a unique opportunity that enables us to build on knowledge-based employment that is of regional and possibly national significance. This type of specialist employment could not be provided elsewhere and the proposed development is in conformity with paragraph 21 of the NPPF which requires the Council to “plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries”. As part of the Gosden Hill Farm site, we are proposing a new employment Headquarters along the A3. We consider this will be attractive to the market and is well located well in terms of its position on the A3 and planned new rail station and Park and Ride.
 - Extension to the Park and Ride – there is no immediate need for additional parking capacity as there remains capacity at present. The park and ride proposed at Gosden Hill Farm will also likely absorb some future demand.
- 4.143 It therefore contributes less to the overall sustainability of the plan. We consider that this, together with the harm that it would cause to highly sensitive area of Green Belt, make the site unsuitable for allocation within this Local Plan.
- 4.144 On this basis, we consider that the harm associated with additional development on these two sites would significantly and demonstrably outweigh the benefits, which are largely only related to the provision of additional housing. Whilst urban extensions to Guildford are higher in the spatial hierarchy, we consider that it is more sustainable to instead explore the extent to which the next development option in the spatial hierarchy can contribute towards meeting OAN. However, given it is less reliant on

Highways England's A3 Guildford scheme and its preference in the spatial hierarchy, it is considered appropriate for SA testing purposes to include the site at Clandon Golf for approximately 1,000 homes within the alternative spatial strategy that seeks to meet some of the unmet needs within the HMA.

New settlement at the former Wisley airfield

- 4.145 This site is located in a yellow medium sensitivity land parcel. Given the partly brownfield element, the sustainability merits of strategic sites due to the infrastructure that can be provided alongside them, the extent to which it can help deliver the homes needed and the NPPF support given to this development option, this site is also included as an allocation in the Submission Local Plan.
- 4.146 This site was also identified at the draft Local Plan (2014) stage. This site is also of a scale (approximately 2,000 homes) which will provide other uses that benefit the future occupants of the site as well as the wider community, and provides or contributes towards a significant level of infrastructure. This includes traveller pitches, a new local centre with associated community and retail uses, a primary school, a four form entry secondary school, a locally significant employment site, Suitable Alternative Natural Greenspace (SANG) and other open space.
- 4.147 The secondary school will provide for sufficient school capacity for needs arising from the planned development of the site and, in combination with the school at Gosden Hill Farm, provide for the additional educational need arising in the eastern part of the borough. Given the site is isolated, it is important that it is of a scale that enables the delivery for as many of the day-to-day services as possible on site. The provision of the local centre with community services, together with the primary and secondary school will help ensure that the site is relatively self-contained. We acknowledge that residents are likely to need to travel for employment and higher order services however we consider that the package of transport measures proposed on site will maximise opportunities for sustainable forms of travel. This is discussed further below.
- 4.148 The site area within the Regulation 19 Local Plan (2016) was greater than that proposed in the draft Local Plan (2014). The site area increased further still in the Regulation 19 Local Plan (2017). This is as a result of additional land to the south of the site becoming available for development and therefore being included as part of the allocation. This additional land is consistent with the findings of the GBCS Volume V which identified a larger Potential Major Development Area as being potentially suitable for development. Whilst the size of the site has been increased, the scale of the housing allocation has not (discussed further below).
- 4.149 A planning application for a new settlement was refused on this site. The outline application (Ref: 15/P/00012) was for up to 2,068 dwellings incorporating up to 100 sheltered accommodation units, eight traveller pitches and associated infrastructure. The scheme was refused for 14 reasons. Whilst this is a consideration in terms of assessing the suitability of this site for allocation, notwithstanding the current Green Belt designation, we consider that the individual reasons for refusal relate to the specifics of the submitted scheme. The Submission Local Plan proposes to remove this land from the Green Belt and we consider the remaining reasons are capable of being overcome. The refusal was subject to an appeal and a public inquiry was held in September/October 2017. Each of the reasons for the original refusal are discussed below:

- Green Belt - the scheme put forward was inappropriate development in the Green Belt with insufficient very special circumstances demonstrated. This is not relevant for plan-making purposes as we consider there are exceptional circumstances that warrant the amendment of Green Belt boundaries as set out earlier in this paper. If the Local Plan were adopted, the site would no longer be in the Green Belt.
- SPA - there was no mechanism in place to secure the SPA mitigation and avoidance measures. Natural England, the Government advisors on SPA matters, consider the package of measures being proposed would mitigate the impact of development on the SPA. The refusal reason therefore related not to the principle of development but the absence of an appropriate mechanism in place to secure the mitigation. The promoters of the southern part of the site have also agreed in principle appropriate mitigation with Natural England.
- Transport – it had not been demonstrated that the scheme would not give rise to a severe adverse impact on the strategic and local road network. Further work has been undertaken in relation to this and Surrey County Council consider that if the main non-strategic transport infrastructure included in the site policy is provided then the potential for a severe impact on the local road network will be mitigated. The Planning Inquiry closed in October 2017 and work continues between the applicant, Surrey County Council, Highways England and ourselves to provide further information to resolve outstanding issues. Significant progress had been made by December 2017.
- Transport sustainability – the application did not include a suitable legal agreement to deliver transport sustainability measures to minimise the reliance on the private car. Further work has been undertaken in relation to this. This includes a significant bus network, provided in perpetuity, to a range of nearby rail stations and service centres. They are also investigating an off site cycle network to key destinations although it is recognised that there may be a requirement to obtain third party land if off-road facilities are required by Surrey County Council.
- Affordable housing – the application did not include a completed legal agreement to secure an appropriate provision of affordable housing. The Proposed Submission Local Plan includes a requirement for 40 per cent affordable housing. Our viability evidence shows that the vast majority of developments included in the draft local plan in most locations in the borough, as well as the strategic sites, are viable.
- Existing district and local centres – it had not been demonstrated that the scheme would not have an impact on the viability and vitality of existing centres because the floorspace is not in a designated centre. The Proposed Submission Local Plan site allocation proposes that this site includes a local centre. This issue will therefore no longer be relevant.
- Waste – the application proposed development on a safeguarded waste site. Surrey County Council is currently in the process of reviewing the Surrey Waste Plan. Surrey County Council carried out an ‘Issues and Options’ consultation and a ‘Call for Sites’ in 2016. We understand that this site is no longer available for waste uses and Surrey County Council has confirmed that there is currently no justification or intention to compulsorily purchase the site for waste uses. Furthermore, this site has now been excluded as a proposed site for the delivery of waste management infrastructure at the preliminary sieving stage as part of the Draft Surrey Waste Local Plan (October 2017), which is being consulted upon and is intended to replace the Surrey Waste Plan (2008). We therefore do not expect this site to be safeguarded in the new Waste Plan.

- Design – it had not been demonstrated that the scheme would not cause significant harm to the character of the surrounding area or not have an adverse impact on nearby heritage assets. The scheme proposed included high density development that was not considered appropriate in its context. The proposed allocation is on a larger site however the overall capacity of the site has not been increased. We consider that the additional land will enable a more appropriate scheme to be designed of a density and layout which is appropriate to its rural context.
- Air quality – it had not been demonstrated that the scheme would not give rise to an unacceptable air quality impact on local receptors including future residents and protected ecological sites. Further evidence was prepared to address this issue and we are satisfied that any potential impact could be satisfactorily mitigated.
- Infrastructure – the application did not include a suitable legal agreement to mitigate the impact of the development on education, policing, health and library infrastructure. This is capable of being overcome through the agreement of an appropriate legal agreement and relevant contributions.

4.150 Whilst a small western part of the site is designated as a Site of Nature Conservation Interest (SNCI) in the current Local Plan 2003, a larger area covering the northern part of the site is recommended as SNCI from a survey undertaken in 2007. The Submission Local Plan designates the larger SNCI. The design of the site will need to respond to the findings of this work in accordance with Policy ID4: Green and Blue Infrastructure. Given the survey identifies that the areas considered to be of high value are concentrated in a limited number of locations, we do not consider that this precludes development of the site and that appropriate mitigation or enhancement is possible.

4.151 On this basis, we therefore consider that the significant benefits of development at this site as set out above outweigh the harm that may be caused by removing this land from medium sensitivity Green Belt. This constitutes the exceptional circumstances required to amend Green Belt boundaries in this location within the context of the reasons outlined in para 4.43 – 4.44 above which justify the necessity of amending the Green Belt boundary in Guildford.

Development around villages

4.152 This option can be a sustainable option so long as careful consideration is given to the choice of location, where it can enhance or maintain the vitality of rural communities. This development option is also very important in terms of maximising opportunities to significantly boost the supply of housing as required by the NPPF. The plan is heavily reliant on the delivery of larger strategic sites to meet OAN, the delivery of which are linked to the necessary improvements to the A3 (with the exception of North Street). For this reason, it is important that we consider smaller sites, such as those around villages, which are able to deliver in the early years to ensure that whilst much of our supply is back loaded, we are nevertheless making a concerted effort to boost the sustainable supply of housing in the early years.

4.153 In accordance with the NPPF, we should direct development to villages which are or can be made more sustainable through additional growth. This option is however lower in the hierarchy than the strategic sites, and for that reason we consider that, as a starting position, we should seek to maintain the integrity of the Green Belt by limiting growth to those sites that are located in green (low sensitivity) land parcels only.

- 4.154 The following sites accord with the principle of development on low sensitivity land and will help deliver necessary homes in the early years. As set out above, the further site previously identified in the Regulation 19 Local Plan (2016) at Flexford has been removed due to its ongoing designation as a Site of Nature Conservation Importance (SNCI) and incompatibility with development.

East Horsley and West Horsley (north)

- 4.155 Four sites were identified here in the Regulation 19 Local Plan (2016), three of which were identified in the draft Local Plan (2014). The additional site added to the plan in 2016 is in response to confirmation of availability (site allocation A41). However, as set out above this site was subsequently removed in the Regulation 19 Local Plan (2017). In total this source of supply will deliver 355 homes. East Horsley is defined as the most sustainable village in the Settlement Hierarchy - a Rural Service Centre. It should therefore be the focus for growth in the rural areas. It is assessed as being very sustainable due to the level of services and facilities available in the village. West Horsley (north), whilst not defined as a Rural Service Centre, is nevertheless a large village and physically adjoins East Horsley. We therefore consider that it functions as part of East Horsley. The sites are all within close proximity to the district retail and service centre and Horsley train station.
- 4.156 On this basis we consider that the benefits of developing these sites outweigh the harm that may be caused by removing this land from low sensitivity Green Belt. This constitutes the exceptional circumstances required to amend Green Belt boundaries in this location within the context of the reasons outlined in para 4.43 – 4.44 above which justify the necessity of amending the Green Belt boundary in Guildford.

Send

- 4.157 One small site was first identified here in the Regulation 19 Local Plan (2016) with capacity for 40 homes and two traveller pitches. The site remains in the Submission Local Plan. The site is partly owned by the Council and we are seeking to deliver two traveller pitches on part of the site to help meet the borough-wide need. Provision of pitches on the edge of one of our more sustainable villages will help ensure better integration of our travelling and settled communities. Occupiers of new homes on this site would have good access to facilities such as education and health care.
- 4.158 On this basis we consider that the benefits of developing this site outweigh the harm that may be caused by removing this land from low sensitivity Green Belt. This constitutes the exceptional circumstances required to amend Green Belt boundaries in this location within the context of the reasons outlined in para 4.43 – 4.44 above which justify the necessity of amending the Green Belt boundary in Guildford.

Exceptions to the Green Belt sensitivity

- 4.159 Whilst we consider as a starting position that development on medium and high sensitivity Green Belt is inappropriate, we still need to assess whether there are particular benefits in doing so which would serve to outweigh the Green Belt harm and justify the exceptional circumstances for removing them from the Green Belt. We consider that there are two sites which justify deviating from this principle and these are discussed below.

Garlick's Arch, Send Marsh Burnt Common and Ripley

4.160 The Regulation 19 Local Plan (2016) identified a site at Garlick's Arch located in a yellow (medium) sensitivity land parcel for 7,000 sqm of industrial land and 400 homes. Our Employment Land Needs Assessment (ELNA) identifies a need for industrial land. This site is identified in the GBCS (Volume V) and was available and suitable to accommodate this use. The industrial use was removed from the site in the Regulation 19 Local Plan (2017) following concern raised regarding the compatibility of industrial use with residential. It is also considered that there are additional benefits associated with allocating the industrial use on an alternative site (discussed further below). The site also facilitates the provision of an A3 northbound on-slip and an A3 southbound off-slip at A247 Clandon Road (Burnt Common) (site policy 43a), which will provide mitigation to address the impacts of growth in particular related to the development of the former Wisley airfield, and is fully supported by Surrey County Council. This has been discussed with Highways England and subject to the submission of further technical and financial work they have confirmed that there is no in-principle objection to new north-facing slips at the existing junction. We will continue to work with them to address any outstanding requirements. With the removal of the industrial allocation, the Regulation 19 Local Plan (2017) added an allocation on the site for six Travelling Showpeople plots (previously identified on the strategic site at Normandy and Flexford in the Regulation 19 Local Plan (2016) but which was subsequently removed from the plan).

Land around Burnt Common warehouse, London Road, Send

- 4.161 The industrial uses that are no longer being met on the Garlick's Arch site are now proposed to be met on land around Burnt Common warehouse. This site is also located on medium sensitivity Green Belt and was proposed in the draft Local Plan (2014) for 7,000 sqm of industrial land and 100 homes but removed in the Regulation 19 Local Plan (2016) when it was replaced with Garlick's Arch. This was on the basis that the industrial uses could be accommodated on Garlick's Arch with an increased number of homes (400 instead of 100) to help meet early delivery. The swap also lessened perceived issues of coalescence with the Gosden Hill Farm urban extension and facilitated the delivery of the new slip roads.
- 4.162 As set out above, following concerns raised regarding the allocation of industrial uses on Garlick's Arch, this element of the allocation was moved in the Regulation 19 Local Plan (2017) to land around Burnt Common warehouse. The Burnt Common site has however been reduced in area to that previously identified in 2014 which addresses the issues related to perceived coalescence.
- 4.163 This site is also preferable for industrial development given it already has an element of employment on the site, is separate from residential development and has potential capacity for additional floorspace which could be justified through future borough employment land needs assessments. This provides some flexibility and certainty for meeting future needs given the difficulty in identifying suitable industrial land.
- 4.164 On this basis we consider that the benefits of developing these two sites outweigh the harm that may be caused by removing this land from medium sensitivity Green Belt. This constitutes the exceptional circumstances required to amend Green Belt boundaries in this location within the context of the reasons outlined in para 4.43 – 4.44 above which justify the necessity of amending the Green Belt boundary in Guildford.

Rejected sites

- 4.165 There are a number of other PDAs across the borough, located on medium or high sensitivity Green Belt land, which we do not consider are appropriate for allocation. In particular given the importance of Green Belt, we consider that the harm of locating development on high sensitivity Green Belt in particular around the villages should be given considerable weight. These are discussed further below.

Further allocations around the Horsleys

- 4.166 The Submission Local Plan is already proposing to allocate sites of approximately 400 homes in and around the Horsleys. There are likely to be other smaller scale sites that come forward in addition to this, as identified in the Land Availability Assessment (LAA), on the basis that the village is proposed to be inset from the Green Belt.
- 4.167 The GBCS identifies a number of additional sites PDAs around the Horsleys, located on high sensitivity Green Belt. However given the scale of growth already planned to occur within the Horsleys, all of which is anticipated to occur within the first five years, we do not consider that further allocations (which would bring the total up to approximately 700 homes), also within the early part of the plan period, are appropriate or sustainable. Additional growth within such a short period has the potential to overwhelm the existing community and create difficulties in integration. A significant level of development occurring quickly without a period of adjustment during which the new community can assimilate with the existing residents is likely to cause issues related to community cohesion. It is also more likely to have a negative impact on the perceived character of the area and cause a greater strain on local services and facilities as some of the wider planned new infrastructure is programmed to be delivered later in the plan period. For these reasons, the harm associated with providing more homes here is considered to significantly and demonstrably outweigh the benefits of doing so.

Further allocations around the Send, Send Marsh/Burnt Common and Ripley

- 4.168 The Submission Local Plan is already proposing to allocate sites of approximately 500 homes around Send Marsh/Burnt Common and a further almost 30 homes in Ripley. There are likely to be other smaller scale sites that come forward in addition to this within the vicinity of Send, Send Marsh/Burnt Common and Ripley, as identified in the Land Availability Assessment (LAA), on the basis that these villages are proposed to be inset from the Green Belt.
- 4.169 The GBCS identifies a number of additional PDAs within this area, located on medium and high sensitivity Green Belt. We consider the same justification, as set out above for the Horsleys, applies to this area. Namely, the harm associated with additional growth over and above that already proposed, all occurring within the first five years of the plan, significantly and demonstrably outweighs the benefits.
- 4.170 However, given benefits in relation to early delivery and its location on medium rather than high sensitivity Green Belt, it is considered appropriate for SA testing purposes to include the site at Aldertons Farm, Send Marsh for approximately 100 homes within the alternative spatial strategy that seeks to meet some of the unmet needs within the HMA.

Allocation at Effingham

- 4.171 The GBCS identifies a PDA on the edge of Effingham, located on high sensitivity Green Belt. The size of the PDA identified in the GBCS would, if allocated and removed from the Green Belt, need to be increased to include land to the north west of the site up to Thornet Wood. This is because the boundary originally identified in the GBCS has been eroded and is no longer considered to be sufficiently defensible to constitute an appropriate Green Belt boundary.
- 4.172 Whilst the promoters of this site are proposing to relocate the existing Howard of Effingham secondary school as part of developing this site, Surrey County Council has confirmed this is not necessary to meeting existing needs, nor is it necessary to meet the needs arising from the planned growth. The scale of development at over 300 homes combined with its location in high sensitivity Green Belt means the harm associated with providing more homes in this location is considered to significantly and demonstrably outweigh the benefits. This site is subject to an appeal (ref: 14/P/02109) with the inspector's decision expected in early 2018.

Allocations around Normandy and Flexford

- 4.173 The significant expansion at Normandy and Flexford is no longer proposed to be allocated for the reasons set out above. In addition to this strategic site, the GBCS identifies several smaller PDAs around Normandy and Flexford. The Settlement Hierarchy assesses both Normandy and Flexford as having limited services and facilities. In contrast to the strategic site no longer considered appropriate, the remaining PDAs is not of a sufficient scale to deliver any viable and tangible infrastructure improvements that would provide sustainability benefits to the existing and new residents. We therefore consider their allocation would not constitute sustainable development and the harm associated with providing more homes here would significantly and demonstrably outweigh the benefits.
- 4.174 Whilst the site is located on high sensitivity Green Belt, the benefits associated with early delivery and its proximity to Wanborough rail station mean it is considered appropriate for SA testing purposes to include the site east of Glaziers Lane, Flexford for approximately 100 homes, within the alternative spatial strategy that seeks to meet some of the unmet needs within the HMA.

Allocations around Fairlands

- 4.175 The GBCS identifies a number of PDAs around Fairlands, located on high sensitivity Green Belt. Development on these sites would create the same issues in the early part of the plan period as would development at Liddington Hall. Namely we have no evidence that the development at Fairlands would be able to provide any short-term alleviation and any development here would therefore reduce any existing and freed up 'headroom' capacity on this stretch of A3. We therefore consider that the total delivery within the first ten years of the plan until the A3 Guildford RIS scheme is delivered is unlikely to be increased through the allocation of this site, given the potential for a severe impact on the A3. We consider that this, together with the harm that it would cause to this highly sensitive area of Green Belt, make these sites unsuitable for allocation within this Local Plan.

Allocation at Farncombe

- 4.176 The GBCS identifies a PDA at Farncombe, located on medium sensitivity Green Belt within the AONB. The NPPF states, at paragraph 116, that planning permission should be refused for major developments except in exceptional circumstances and where it can be demonstrated they are in the public interest. At approximately 100 homes this is classed as major development. We do not consider that the benefits with providing these homes pass the considerations listed within the NPPF bullet points and which form part of the public interest assessment.

Allocation at Aaron's Hill, Godalming

- 4.177 The GBCS does not identify any PDAs around Godalming. It states that land within Guildford borough is generally separated from Godalming and that development would therefore not be continuous with the settlement boundary unless future development was brought forward within Waverley. Waverley Borough Council undertook a Green Belt review which identified a cross-boundary site. The part of the site within Guildford borough is located on a high sensitivity Green Belt land parcel. Waverley's submitted Local Plan Part 1 identified this site as an option to be considered within Local Plan Part 2. Following an initial set of hearing sessions, Waverley consulted on a number of major modifications recommended by the inspector to make the plan sound. This included an amendment of the Green Belt boundary to exclude this site and thereby make it suitable for development.
- 4.178 Given benefits in relation to early delivery, its cross boundary benefits and its proximity to Godalming, it is considered appropriate for SA testing purposes to include the site at Aaron's Hill for approximately 200 homes within the alternative spatial strategy that seeks to meet some of the unmet needs within the HMA.

Allocation at Shalford

- 4.179 The GBCS identifies a PDA at Shalford, located on medium sensitivity Green Belt. This site is located within the AGLV. The current status and future of AGLV has been discussed above in relation to CBGB and are applicable here too. In addition to this, this land is identified as an AONB candidate area in the study by Hankinson Duckett Associates (October 2013). Furthermore there is concern regarding the suitability of the access road to serve approximately 200 homes. For these reasons the harm associated with providing more homes here is considered to significantly and demonstrably outweigh the benefits of doing so.

Allocation at Chilworth

- 4.180 The GBCS identifies a PDA at Chilworth, located on high sensitivity Green Belt. We consider that the harm associated with providing homes here would significantly and demonstrably outweigh the benefits.
- 4.181 However, given benefits in relation to early delivery, it is considered appropriate for SA testing purposes to include the site at Hornhatch Farm for approximately 80 homes within the alternative spatial strategy that seeks to meet some of the unmet needs within the HMA.

Windfall

- 4.182 Whilst every effort has been made to identify all possible future housing sites, there will be some sites that gain planning permission for new homes that are not identified in the LAA, and are under the site size threshold of the LAA. The supply identified in

the Submission Local Plan includes a windfall allowance, to account for these scenarios. An explanation of how the windfall allowance has been calculated is in appendix D of the LAA.

- 4.183 The draft Local Plan (2014) did not include a windfall allowance, primarily on the basis that the SHLAA did not use a site size threshold, and thus inclusion of windfall allowance risked double counting. Equally, historically, many windfall sites have been private residential gardens, which are not eligible for contributing towards windfall (NPPF, para 48).
- 4.184 The NPPG advises using a site size threshold of five homes or more when preparing a LAA. The LAA (2017) takes this approach, and thus there is the opportunity for windfall to continue to come forward on sites less than this size, and on other sites (such as prior approvals, conversions, and so on).
- 4.185 The calculation of a windfall allowance for Guildford borough (LAA - appendix D) takes account of the NPPG requirement for it to be realistic and have regard to the LAA, historic windfall delivery rates and expected future trends, and as mentioned, should not include residential gardens.
- 4.186 The LAA carries out this assessment, and evidences inclusion of 750 homes over the plan period as windfall (60 homes per year from windfall in the years 6-10 and 11-15, and 30 homes per year in the years 1-5). The windfall is less in the first five years, as some of those small sites likely to deliver within this period already have planning permission and are counted in the outstanding capacity (see housing trajectory in the LAA 2017). To count 60 homes per year in this period would be potentially double counting.

Housing provision and flexibility

- 4.187 NPPF says that “*Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change.*” (para 14).
- 4.188 The revised OAN over the plan period is $654 \times 19 \text{ years} = 12,426$ homes (2015-2034). We consider we can meet the OAN with appropriate flexibility. The total potential provision of new homes across the plan period in the Submission Local Plan (including completions since 2015 and outstanding capacity) is 14,191. This provides 1,765 homes as a buffer. This equates to a buffer of 14%. This figure is consistent with the 14% buffer identified in the Regulation 19 Local Plan (2016). This was subsequently reduced to approximately 10% in the Regulation 19 Local Plan (2017) however this was considered justified at that time and was not thought to impact on the robustness of the plan as there was less uncertainty in relation to the our ability to meet the proposed housing requirement. This was due to the more realistic assumptions being made on the strategic sites of Blackwell Farm and Gosden Hill compared to the previous 2016 plan which was based on more optimistic delivery assumptions (namely both sites delivering in full within the plan period).
- 4.189 As part of the update to the LAA (2017), additional suitable sites have been identified which has increased the total supply by over 600 homes. Over half of this increase is expected to be delivered in years 6-10. This is not planned over provision – rather it is built in flexibility within an appropriate range that seeks to limit the risk of housing policies in a newly adopted Local Plan being considered out of date. The NPPF says that, “*Relevant policies for the supply of housing should not be considered up-to-date*

if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites.” (para 49).

- 4.190 Equally, the additional provision does not undermine the assessment of deliverability of sites identified. However, circumstances can change across a plan period (19 years), and sites that are evidenced as deliverable now, may for unforeseen reasons, become undeliverable (such as a change in ownership). Flexibility helps the plan to be prepared for this scenario (“sufficient flexibility to adapt to rapid change”).
- 4.191 For the aforementioned reason, we would not seek to discount a site/sites to reduce provision further to be closer to OAN. Incidentally, if we did, given the NPPF’s requirement to *“boost significantly the supply of housing”* (para 47), and *“deal with undersupply within the first five years of the plan period where possible”* (NPPG, Paragraph: 035 Reference ID: 3-035-20140306), village extensions that can deliver in the first five years of the plan could not be discounted in any event. Even strategic sites currently in the Green Belt are expected to deliver some new homes in the first five years of the plan. Discounting of one such site would remove any flexibility and would lead to under provision against OAN.
- 4.192 Therefore the Proposed Submission Local Plan is presented with sufficient flexibility to lessen the risk of housing policies becoming outdated very quickly and ensuring our strategy is deliverable. This is not planned over delivery, rather this is required in order to ensure early delivery, flexibility and that the OAN is met over the plan period, and that a newly adopted plan does not quickly become out of date.

Ability to contribute towards meeting unmet needs

- 4.193 As set out above and assuming the amendments to the Waverley submission plan are made in line with the Inspectors stated view at the hearing sessions, there is existing unmet need arising from Woking of 1,575 homes to 2026/27. One of the tests of soundness as set out in the NPPF (paragraph 182) is that our plan is positively prepared, namely that *“the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development”*.
- 4.194 The NPPG goes on to say that *“assessing need is just the first stage in developing a Local Plan. Once need has been assessed, the local planning authority should prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period, and in so doing take account of any constraints such as Green Belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need.”*
- 4.195 Therefore whilst maximising opportunities to meet needs across the HMA is our starting position, this needs to be considered alongside other factors to explore whether this is *“reasonable to do so and consistent with achieving sustainable development”*, as set out in the NPPF. This assessment has been articulated above and carried out further as part of the Sustainability Appraisal (SA) process, in which we are required to assess all reasonable alternative spatial strategy options. The SA includes eight spatial strategy options ranging from growth options that seek to ensure that OAN is met (our preferred option that is presented in the Submission Local Plan), up to options that attempt to meet approximately half of Woking’s unmet

need. This is consistent with the approach taken in Waverley's SA that supports their emerging plan and represents the unmet need now remaining as a result of the increased housing target within Waverley's updated plan.

- 4.196 The SA concludes that there is no clear best performing or most sustainable option. Instead, there are trade-offs between competing objectives which need to be considered as part of the local plan process when determining our preferred spatial strategy. This paper has set out our preferred spatial strategy in which we have sought to maximise growth opportunities until the point at which we consider the harm of doing so significantly and demonstrably outweighs the benefits.
- 4.197 As set out above in paragraph 4.11 onwards, we do not consider we can contribute towards meeting unmet needs. Whilst our spatial strategy is based on an overprovision in supply compared to our OAN (of approximately 14%), this is required in order to ensure flexibility and deliverability of our housing target. It therefore cannot be considered to be contributing towards meeting unmet needs within the housing market area. Instead, it is necessary to achieve delivery of our OAN. We consider that without it there is a risk that our plan would be found unsound, particularly in relation to whether it has been positively prepared and is effective. However should all these sites deliver as projected, then this will clearly help meet housing need. There is no policy within the plan that seeks to unduly restrict homes coming forward, so long as it is sustainable to do so. The level of overprovision that may or may not come forward cannot be quantified with greater certainty, given the dependency upon the timing of infrastructure improvements, and to attempt to quantify it would simply risk our ability to demonstrate a rolling 5-year housing land supply. Additionally given the reliance upon the delivery of necessary infrastructure, it is expected that this would likely occur after the period within which the unmet need is identified.
- 4.198 Guildford, Waverley and Woking borough councils signed a Memorandum of Understanding in 2013 which commits the three authorities to work jointly on strategic cross boundary issues. This included preparation of an up to date joint SHMA. Pursuant to this, the three authorities have agreed a Statement of Common Ground. This seeks to demonstrate the commitment by Guildford, Waverley and Woking Borough Councils to work together on an ongoing basis to identify and address strategic cross boundary issues with implications for plan making. In particular, to strive to meet the objectively assessed housing need within the West Surrey HMA. This is discussed further in the Duty to Cooperate topic paper.

Accrued backlog

- 4.199 The housing target from the base date (2015) to adoption of the plan (2019) is 654, and the envisaged backlog at the point of adoption is estimated to be 1,281 homes. This scale of backlog is primarily due to current policy constraints, notably the extent of the Green Belt, which severely restricts the amount of suitable land that can come forward. National policy states that inappropriate development in the Green Belt should not be approved except in very special circumstances (paragraph 87). The NPPG states that "*unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the "very special circumstances" justifying inappropriate development on a site within the Green Belt.*" (Paragraph: 034 Reference ID: 3-034-20141006). This challenging situation will therefore remain until such time as the new Local Plan is adopted and Green Belt boundaries are amended.

4.200 NPPG says, “Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible. Where this cannot be met in the first 5 years, local planning authorities will need to work with neighbouring authorities under the ‘Duty to Cooperate.’” (Paragraph: 035 Reference ID: 3-035-20140306)

4.201 We are not able to meet this level of backlog in the first five years of the plan, as required by the NPPG, without significant harm to the Green Belt, and the other adverse impacts as identified in this topic paper. We therefore consider that local circumstances justify the proposed approach of spreading the backlog over the plan period on the basis of the significant level of infrastructure that is required to be delivered in order to ensure that development across the borough is sustainable. This is further exacerbated by the reliance on a number of strategic sites which by their very nature take longer to deliver. The approach to delivery and demonstrating a rolling five year housing land supply is discussed further below.

Housing number

4.202 Whilst the Submission Local Plan spatial strategy enables the OAN to be met in full across the plan period (12,426), it does not enable provision to meet or exceed 654 (12,426 / 19 years) every year.

4.203 Supply in the first year post adoption shows only a marginal shortfall against 654 (574), and thereafter the housing trajectory shows potential provision in excess of 654 per year. However, this is the flexibility discussed and does not warrant an increase in housing target. A housing number that closely resembles potential provision would reduce/eliminate flexibility, risk an unsound plan or housing policies quickly being considered out of date.

4.204 The Submission Local Plan includes a steadily increasing annual housing target across the plan period against which our five year land supply will be calculated, reflecting likely delivery and accommodating more flexibility in the early years, but still totalling the OAN (12,426). The supply in the early years is likely to exceed the annual housing target but this is necessary to ensure there is a rolling five year housing land supply from the date of adoption, given the backlog accrued to date. To set the target any higher to more closely match expected provision would render us unable to meet the level of backlog we will have accrued up to the date of adoption. This is because any overprovision that does occur compared to the annual housing target will serve to reduce the backlog. As already discussed above, even with the lower annual housing target we are unable to meet the accrued backlog in the first five years. This is discussed in more detail in the section below on the five year land supply.

4.205 The annual housing target per year is shown below (and is included in Policy S2).

Year	Housing number	Year	Housing number
2019/2020	450	2027/2028	700
2020/2021	450	2028/2029	700
2021/2022	500	2029/2030	800
2022/2023	500	2030/2031	810
2023/2024	500	2031/2032	850
2024/2025	550	2032/2033	850

2025/2026	600	2033/2034	850
2026/2027	700		

Housing trajectory

- 4.206 The housing trajectory is a required output of the LAA (NPPG, Paragraph: 028 Reference ID: 3-028-20140306). An updated housing trajectory has been prepared for the LAA (2017). The trajectory shows the estimated delivery timescales for new homes across the plan period, per year, and compares potential housing provision (delivery) to the annual housing target (as set out in Policy S2). It also shows potential affordable housing provision.
- 4.207 Trend based calculations are consistent across the plan period (rural exception and windfall allowance), starting from adoption. Prior to adoption, such sites are counted as outstanding capacity (approved and commenced) or completions.
- 4.208 Whilst the Submission Local Plan proposes amendments to Green Belt boundaries, those sites that are currently located in the Green Belt, but form proposed site allocations, require Green Belt boundaries to be amended in an adopted Local Plan, before development proposals in the form of a planning application are not subject to Green Belt policy. Site allocations identified to start delivering new homes in the first five years from adoption, are likely to twin track the Local Plan process, seeking pre-application advice prior to adoption, and possibly even submitting planning applications. This would enable a planning decision to be made soon after adoption, and new homes estimated to be delivered in the following 18-24 months. Site assessment work by developers to date on many village/urban extension sites suggests progress is being made towards pre-application/planning application stage. It is important to note however, that a site allocation identifies uses, requirements and opportunities for identified land – it is the process of determining a planning application on that land that decides whether the requirements of the site allocation policy have been met. Where this is not the case, planning permission will be refused.

Phasing of strategic sites

- 4.209 The Submission Local Plan strategic sites are:
- North Street redevelopment, Guildford
 - Slyfield Area Regeneration Plan, Guildford
 - Gosden Hill Farm, Guildford
 - Blackwell Farm, Guildford
 - former Wisley airfield
- 4.210 The site allocation policies for former Wisley airfield, Gosden Hill Farm and Blackwell Farm require regard to be had to the delivery and timing of delivery of the key infrastructure requirements on which the delivery of the plan depends. This is reflected in the phasing of the delivery, with the majority of provision anticipated post 2027 and is justified in more detail in the Transport Topic Paper. Delivery is anticipated to start in 2022/2023, three years post adoption. Whilst these sites are also anticipated to twin track the Local Plan process, a greater lead-in time is likely between adoption and delivery than for smaller sites (estimated to start delivery in 2020/2021) due to the site size and their complexity. Whilst former Wisley airfield is anticipated to deliver within the plan period, as set out previously we expect that Gosden Hill Farm and Blackwell Farm are likely to continue to build out beyond the plan period.

- 4.211 Slyfield Area Regeneration Project (SARP) is expected to deliver 1,000 homes within this plan period. The site is likely to have capacity for approximately 1,500 homes but any additional homes are likely to be delivered post this plan period (post 2034). Delivery is anticipated to commence in 2024/2025. Delivery is later than other strategic sites, as the project requires the relocation of the sewage works operated by Thames Water to the former landfill site, the relocation of the Council depot and the relocation of the Surrey County Council waste facility. SARP also requires regard to be had to the delivery and timing of delivery of the key infrastructure requirements on which the delivery of the plan depends.
- 4.212 Whilst North Street redevelopment, Guildford is a strategic site, the primary use is not housing. Housing (up to 400 homes) forms part of a primarily retail lead development, estimated to be delivered in years 6-10, and 11-15 (2024/2025 - 2033/2034).
- 4.213 The housing trajectory illustrating the expected rates of delivery across the plan period, including how specific sites are expected to come forward is set out in Appendix 4.

5% vs 20% buffer

- 4.214 The NPPF says that local authorities should, “*identify and update annually a supply of specific deliverable sites sufficient to provide five years’ worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land*” (para 47).
- 4.215 A buffer does not increase the overall housing number. It is not a percentage increase in provision, rather a quantum of housing “*moved forward from later in the plan period*” to earlier in the plan period. Doing so lessens the quantum required in the later period of the plan.
- 4.216 The absence of a housing target in an adopted development plan makes the assessment of persistent under delivery challenging. However, since 2008/09 completions have been persistently less than the draft South East Plan housing number (322 homes per year), and the adopted South East Plan housing number (422 homes per year). The latter figure was successfully challenged and subsequently deleted. For the last nine years, completions have, in all but one year, been less than 300 homes per year. The spike in completions in 2015/16 at almost 400 homes is due primarily to recent completions in Ash and Tongham, which gained planning permission on countryside land post publication of the NPPF in 2012. Whilst this is a notable increase on the previous year, it remains less than 422 homes a year, and less than current objectively assessed need (654 homes a year). Completions in 2016/17 have subsequently dropped again and are once again less than 322 homes a year. We therefore have a record of persistent under delivery meaning we should plan for a 20% buffer. The Submission Local Plan proposes a significant step change when compared to historic completions, in spite of the annual housing target gradually increasing over time.

Housing completions

<u>Year</u>	<u>Net completions</u>
06/07	357
07/08	478
08/09	130
09/10	227
10/11	190
11/12	262
12/13	234
13/14	137
14/15	242
15/16	387
16/17	294

Five year housing land supply

- 4.217 The effectiveness of the plan is partly measured by the ability to demonstrate a five year supply of deliverable housing land. “*Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites.*” (NPPF, para 49).
- 4.218 At examination, we are required to demonstrate that, once adopted, the plan will provide a rolling five year supply of housing. In doing so, we will be able to count expected supply from sites that are currently unsuitable (due to current Green Belt boundaries) but which will become suitable as a result of policy changes in the new Local Plan (through the amendment of Green Belt boundaries).
- 4.219 Due to the significant issues identified earlier in relation to the accrued backlog and the constraints on the early delivery of homes, we are proposing an approach to calculating a five year supply of homes that is contrary to the methodology advocated by the NPPG. The NPPG recommends meeting the backlog in the first five years and this is known as the Sedgefield approach. Appendix 5 demonstrates what our rolling five year supply would be using this methodology. This illustrates the clear shortfall in housing supply, with less than four years supply, at and in the years following the adoption of the plan.
- 4.220 The alternative accepted methodology for calculating a five year supply is the Liverpool approach. The Liverpool approach establishes the five year supply by spreading the backlog over the remaining plan period, rather than meeting it all in the first five years. Appendix 6 demonstrates what our rolling five year supply would be using this methodology. This illustrates that we would still have a shortfall with less than five years supply at and in the years following the adoption of the plan.
- 4.221 As set out earlier in this paper, we are proposing a stepped target that increases over the plan period. Whilst actual delivery year on year is expected to be greater than the annual housing target, the excess homes over and above the annual housing target will serve to reduce the backlog that has been accrued. It also responds to the need to provide a 20% buffer moved forward from later in the plan period. However consistent with the Liverpool approach, we are proposing to spread the accrued backlog across the remaining plan period. The method proposed for calculating the five year housing land supply is therefore a ‘Liverpool Phased’ approach. Namely, a phased annual target against which we measure our five year requirement and a Liverpool approach to meeting the backlog. Please see Appendix 7 for evidence of the rolling five year land supply using this approach. A phased target has been found to be necessary and sound in a number of other local plan examinations where local circumstances have justified a back-loaded strategy.

- 4.222 We acknowledge that this is contrary to the NPPG. However, in the context of the local circumstances specific to Guilford, as set out above, it is simply not possible to prepare a sound plan that adopts a Sedgefield approach that adopts an annualised housing target, meets all backlog in the first five years and provides the 20% buffer without significant adverse impacts. In order to demonstrate a rolling five year housing land supply at the date of adoption would require an additional 2,100 dwellings in the first six years post-adoption. This would also require annual completions to exceed 1,000 per year from the second year and reach 1,400 in year three. Even doing so would achieve a marginal five year housing land supply in the first few years post-adoption.
- 4.223 This level of development in the first few years of the plan is considered to be unrealistic given necessary lead in times to deliver this scale of growth. In addition to this, the existing infrastructure capacity could not sustainably support this level of growth. The plan already seeks to maximise delivery consistent with the existing infrastructure capacity within the early years of the plan.
- 4.224 In contrast, for the purposes of calculating a five year housing land supply for the current monitoring period from 1 April 2017, we can only include sites which are currently considered deliverable. The NPPF states at paragraph 47, footnote 11 that to be considered deliverable sites “*should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable*”. For this reason, we can only include sites that are compliant with current planning policy within our supply. Our five year supply as at April 2017 is set out in the Monitoring Report 2016/17⁵. This identifies a current five year land supply of 2.36 years.

Conclusion

- 4.225 The NPPF is designed to boost housing supply through the requirement for local planning authorities to maintain a five year housing land supply. The effect of the Submission Local Plan will be to significantly boost the supply of housing in Guildford. The projected trajectory confirms that for every year after adoption of the plan completions will be greater than achieved in any previous year since 2006.
- 4.226 Guildford’s latest OAN figure of 654 is significantly higher than historical annual completions which, since 2006, have never exceeded 500 homes and only exceeded 400 homes in one year. The reason for this is primarily a result of the 89% of the borough being designated as Green Belt, and that development of this scale can only be achieved through significant release of Green Belt land. The Submission Local Plan, having considered all opportunities for brownfield development sites, has determined it necessary to allocate over 50% of housing supply on Green Belt sites. These sites are not going to contribute to meeting housing need until they are allocated in an adopted plan. This set of circumstances means the housing backlog that we carry forward into the plan period is considerable and cannot be met until a plan is adopted.
- 4.227 A further issue that mitigates against early delivery is the appropriate emphasis on the allocation of strategic sites. The predominance of large strategic sites in the plan is a reflection of the need to allocate greenfield sites and thus amend the Green Belt

⁵ This is available to view online at www.guilford.gov.uk/planningandbuildingcontroldocumentsandpublications

boundary. These urban extensions are considered to be the most sustainable site options available. These sites are able to deliver significant infrastructure, but are also dependent upon the delivery of significant highway improvements which takes time, and therefore results in delays in housing delivery. Once again there is a danger that insisting upon early delivery would be at the cost of good long term sustainability.

Housing implementation strategy

- 4.228 The NPPF says that local planning authorities should, “*for market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their housing target*”.
- 4.229 To help maintain delivery of a five year supply of housing:
- We have, and will continue to, liaise with landowners and developers of site allocations and realistic candidates for development through any subsequent LAA updates
 - We will continue to encourage suitable sites to come forward for development as soon as possible (as discussed, the housing number is not a ceiling, and delivery may exceed it)
 - We will monitor the delivery of housing each year in the Monitoring Report, assessing delivery against requirement, and identifying any possible challenges in relation to meeting housing numbers as soon as possible
 - We have Development Management teams who are able to provide timely pre-application advice and determine major planning applications
 - We will consider preparation of a Guildford Town Centre Area Action Plan if needed and identify additional development sites (for example, if a strategic flood risk alleviation scheme becomes deliverable)
 - The Council has created a new housing company to provide homes across a range of tenures
 - We have a major projects team, looking at regeneration opportunities in accordance with the Regeneration Strategy 2017, with specific focus on Guildford town centre.
 - The Council will continue work closely with the traveller community in our borough, and to review needs assessments when appropriate
 - To assist with the provision of affordable housing we will continue to implement, and update when required, our housing strategy, seek adequate provision from site allocations and work with local communities to progress rural exception sites.

Consultation feedback

- 4.230 As part of developing the Local Plan we have consulted at the following main stages:
- Regulation 18 Issues and options (October 2013) – which identified a range of issues and potential options for how we should plan for Guildford borough
 - Regulation 18 Draft Local Plan (July 2014) – which outlined our preferred approach for planning for Guildford borough
 - Regulation 19 Proposed Submission Local Plan (June 2016) – which included the policies and sites that we had intended to submit for examination
 - Regulation 19 Proposed Submission Local Plan (June 2017) – a targeted consultation on proposed changes to policies and sites

- 4.231 Comments received as part of the consultation stages have been taken into account in the preparation of the Local Plan. The main issues raised in all four consultations, together with our response, is set out in the accompanying Consultation Statement.
- 4.232 A key issue that has been raised through each consultation period is in relation to the robustness of the SHMA and the housing target. There are contrasting views as to whether the OAN and related housing requirement should be lower or higher. Our approach to delivery has also been a key issue raised together with our proposed spatial strategy and site allocations. A significant number of comments were made regarding development not being equally distributed across the borough. The distribution of homes across the whole plan period is shown in Appendix 8.

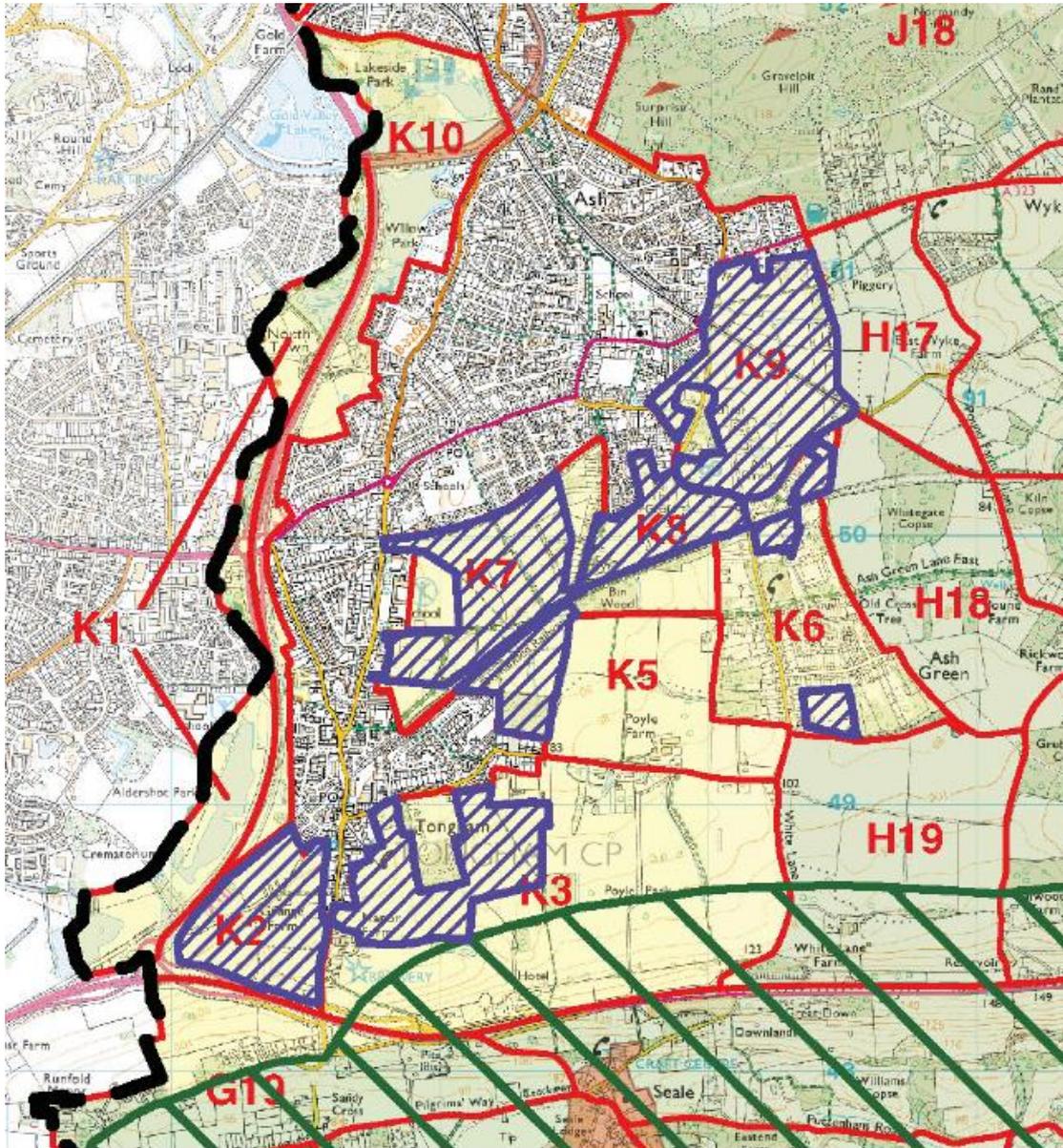
5 Local Plan Policy Approach

- 5.1 The following section sets out the Local Plan approach following consideration of the evidence base including planning law, policy, guidance, facts, figures, research, and the public and Councillors' feedback and professional opinions.
- 5.2 The Submission Local Plan includes a number of policies relating to housing delivery.
- 5.3 Policy S2: Planning for the borough - our spatial development strategy, sets out the requirements for housing delivery across the plan period. This includes 4 permanent pitches for Gypsies and Travellers and 4 permanent plots for Travelling Showpeople (as defined by Planning Policy for Traveller Sites) between 2017 and 2034. Whilst the needs of Gypsies, Travellers and Travelling Showpeople who do not meet the planning definition fall outside this allocation, in order to meet their assessed needs we will seek to provide 41 permanent pitches for Gypsies and Travellers and 4 permanent plots for Travelling Showpeople who do not meet the definition. We will also seek to make provision for 8 permanent pitches to meet potential additional need of households of unknown planning status.
- 5.4 Policies A1-A59 set out the site allocations which support the vision and objectives of the Local Plan. Each site policy lists the land uses that are acceptable on the identified land along with specific requirements and opportunities for future development. The LAA also provides further information about the deliverability of sites and potential timescales. Site allocations still require planning permission prior to development, as only the principle of development and use is identified as part of a site policy.

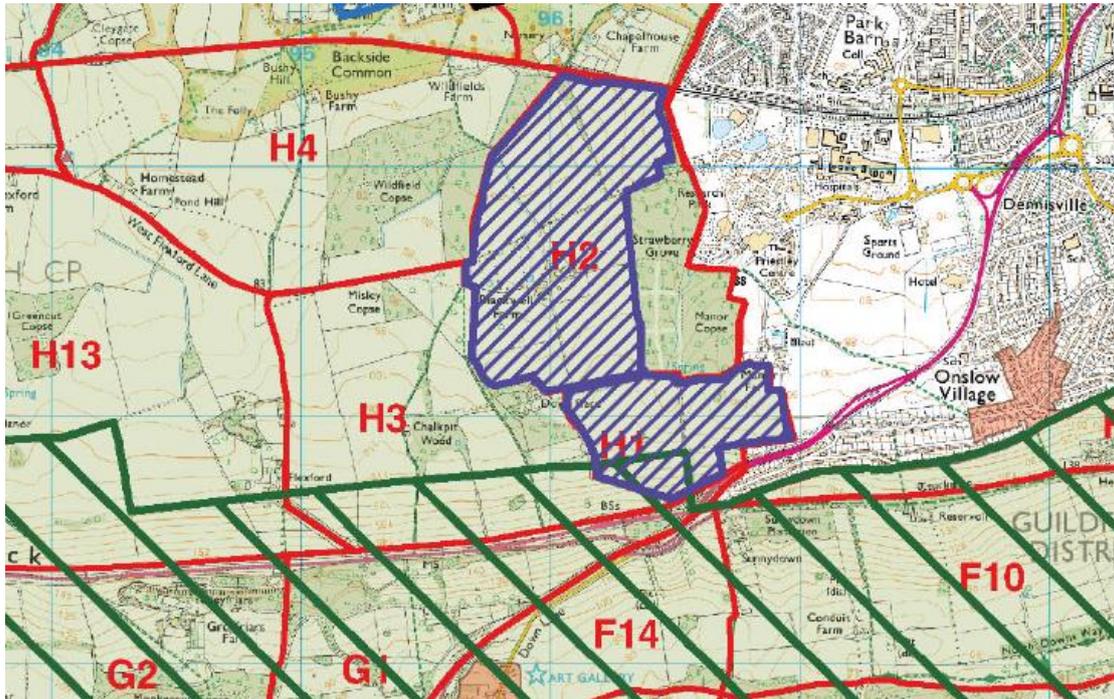
6. Next steps

- 6.1 The draft Local Plan strategy on housing delivery responds to the requirements of national policy and the results of our evidence.
- 6.2 This topic paper accompanies the Submission Local Plan: strategy and sites that is submitted to the Secretary of State in December 2017. For more information please visit: www.guildford.gov.uk/newlocalplan

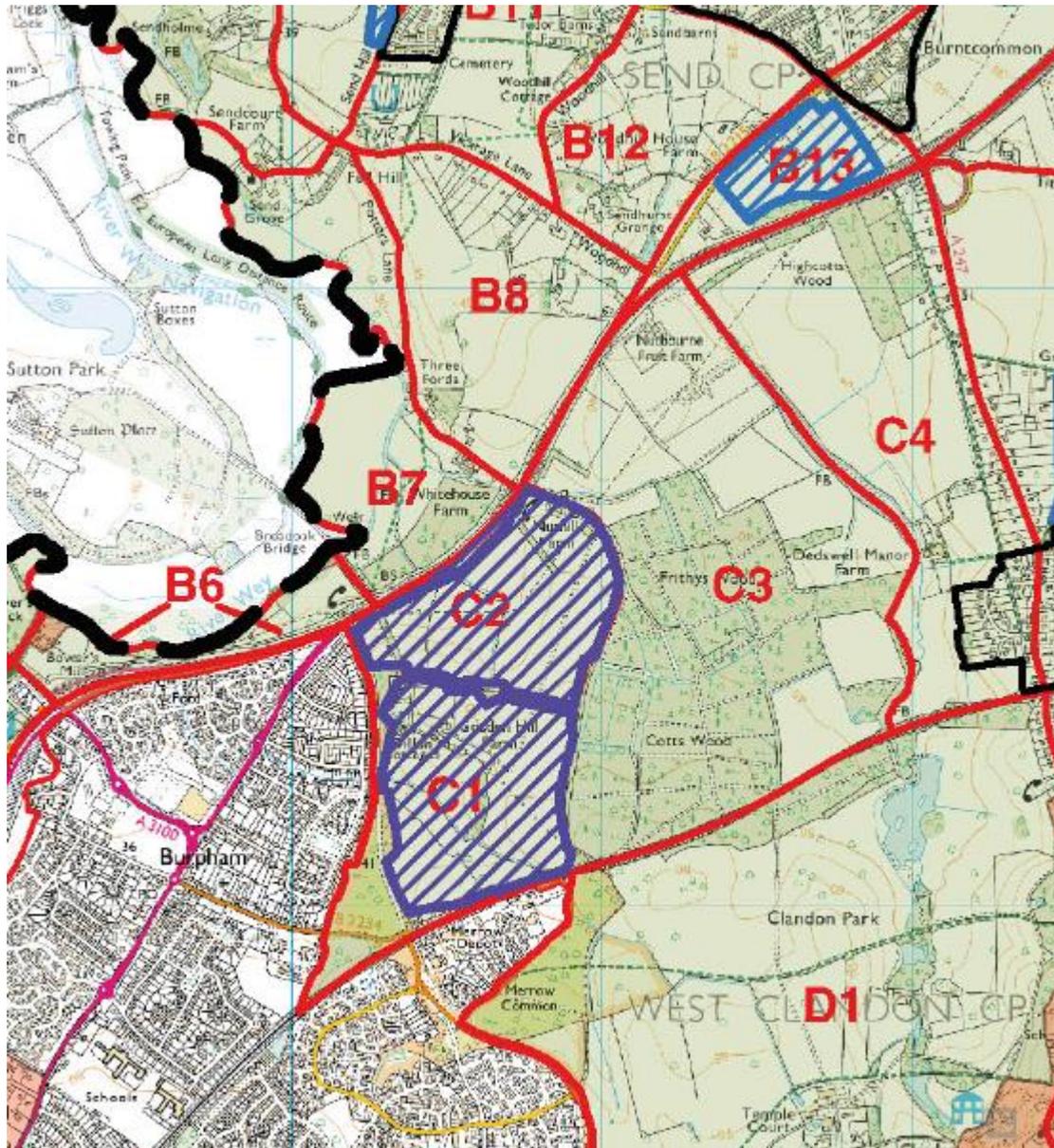
Appendix 1: GBCS extract at Ash and Tongham



Appendix 2: GBCS extract at Blackwell Farm



Appendix 3: GBCS extract at Gosden Hill Farm

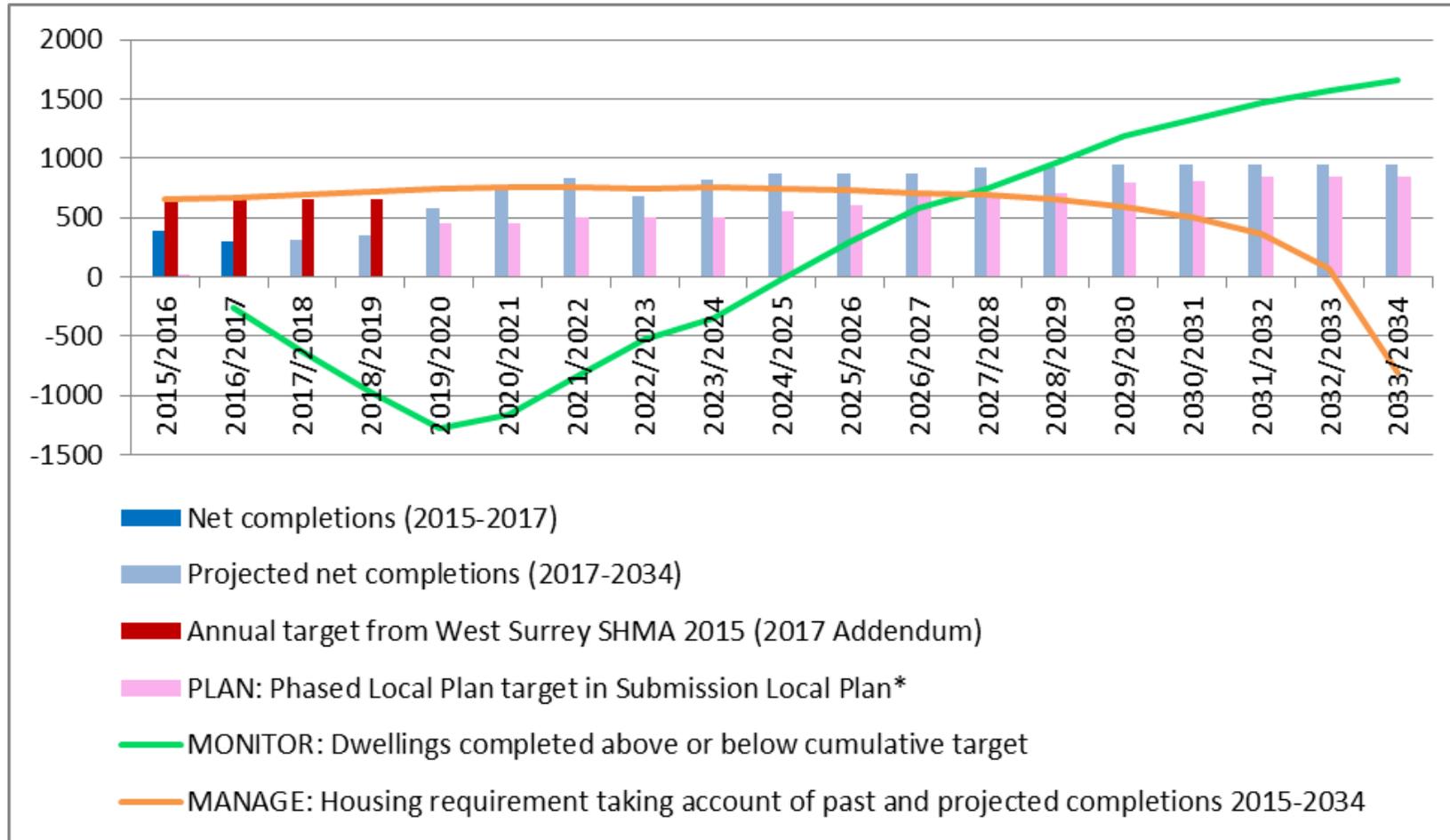


Appendix 4: Housing trajectory (table)

	Pre-adoption				First five years					6-10 YEARS					11 - 15 YEARS					Total	
	2015/2016	2016/2017	2017/2018	2018/2019	2019/2020	2020/2021	2021/2022	2022/2023	2023/2024	2024/2025	2025/2026	2026/2027	2027/2028	2028/2029	2029/2030	2030/2031	2031/2032	2032/2033	2033/2034		
Completions	387	294	158																	839	
Outstanding capacity (Commenced)			148	148											14	13	13	13	13	362	
Outstanding capacity (Approved)				200	395	395	395													1385	
Windfall					30	30	30	30	30	60	60	60	60	60	60	60	60	60	60	60	750
Rural exception					6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	90
Town Centre					18	18	18	18	18	172	171	171	171	171	55	55	55	55	55	1221	
Guildford urban area (excluding SARP)					37	37	37	37	37	23	22	22	22	22	21	21	21	20	20	399	
Slyfield Area Regeneration Plan										100	100	100	100	100	100	100	100	100	100	1000	
Ash and Tongham (urban area)										7	7	7	7	7	4	4	4	4	4	54	
Ash and Tongham extension (currently countryside)							62	75	75	92	92	91	91	91	92	91	91	91	91	1125	
Within villages					16	16	16	15	15	3	2	2	2	2	13	13	13	13	13	154	
Villages (land proposed to be inset from the Green Belt)					46	46	45	45	45	5	5	5	5	5	4	4	4	4	4	272	
PDL in the Green Belt					24	24	23	23	23	56	56	56	55	55						395	
Proposed new settlement (former Wisley airfield)								50	100	150	150	150	200	200	200	200	200	200	200	2000	
Extensions to urban areas and villages																					
Proposed extension to urban area (Gosden Hill, Guildford)								50	100	100	100	100	100	100	210	210	210	210	210	1700	
Proposed extension to urban area (Blackwell Farm, Guildford)								50	100	100	100	100	100	100	170	170	170	170	170	1500	
Land north of Keens Lane, Guildford						38	38	37	37											150	
Land to the north of West Horsley						30	30	30	30											120	
Land to the west of West Horsley						34	34	34	33											135	
Land near Horsley Railway Station, Ockham Road North, West Horsley						25	25	25	25											100	
Land at Garlick's Arch, Send Marsh/Burnt Common and Ripley						50	50	150	150											400	
Land west of Winds Ridge and Send Hill, Send						20	20													40	
Potential housing provision	387	294	306	348	572	769	829	675	824	874	871	870	919	919	949	947	947	946	945	14191	

	Pre-adoption				First five years					6-10 YEARS					11 - 15 YEARS					
	2015/2016	2016/2017	2017/2018	2018/2019	2019/2020	2020/2021	2021/2022	2022/2023	2023/2024	2024/2025	2025/2026	2026/2027	2027/2028	2028/2029	2029/2030	2030/2031	2031/2032	2032/2033	2033/2034	
Net completions (2015-2017)	387	294																		
Projected net completions (2017-2034)			306	348	572	769	829	675	824	874	871	870	919	919	949	947	947	946	945	945
Cumulative completions (past and projected)	387	681	987	1335	1907	2676	3505	4180	5004	5878	6749	7619	8538	9457	10406	11353	12300	13246	14191	14191
Cumulative annual target	654	1308	1962	2616	3066	3516	4016	4516	5016	5566	6166	6866	7566	8266	9066	9876	10726	11576	12426	12426
Annual target from West Surrey SHMA 2015 (2017 Addendum)	654	654	654	654																
Phased target in Submission Local Plan					450	450	500	500	500	550	600	700	700	700	800	810	850	850	850	850
MONITOR: Dwellings completed above or below cumulative target			-267	-627	-975	-1281	-1159	-840	-511	-336	-12	312	583	753	972	1191	1340	1477	1574	1670
MANAGE: Housing requirement taking account of past and projected completions 2015-2034	654	669	691	715	739	751	750	743	750	742	728	710	687	648	594	505	358	63	-820	-820
Potential affordable housing provision	125	32	108	167	64	208	232	264	324	332	330	330	350	350	356	356	356	355	355	355

Appendix 4: Housing trajectory (graph)



*Phased Local Plan target applied from 2019/2020 (First monitoring year after scheduled Plan adoption date)

Appendix 5: Five year housing land supply - Sedgefield

	Pre-adoption				First five years					6-10 YEARS					11 - 15 YEARS					Total
	2015/2016	2016/2017	2017/2018	2018/2019	2019/2020	2020/2021	2021/2022	2022/2023	2023/2024	2024/2025	2025/2026	2026/2027	2027/2028	2028/2029	2029/2030	2030/2031	2031/2032	2032/2033	2033/2034	
LP requirement of 12426 annualised over plan period (2015 - 34)	654	654	654	654	654	654	654	654	654	654	654	654	654	654	654	654	654	654	654	12426
Years remaining	19	18	17	16	15	14	13	12	11	10	9	8	7	6	5	4	3	2	1	
Supply	387	294	306	348	572	769	829	675	824	874	871	870	919	919	949	947	947	946	945	14191
Backlog/Surplus		-267	-627	-975	-1281	-1363	-1248	-1073	-1052	-882	-662	-445	-229	36	301	596	889	1182	1474	
5 year requirement + backlog/surplus	3270	3537	3897	4245	4551	4633	4518	4343	4322	4152	3932	3715	3499	3234	2969					
5 year requirement plus 20% buffer	3924	4244	4676	5094	5461	5560	5422	5212	5186	4982	4718	4458	4199	3881	3563					
5 year supply	1907	2289	2824	3193	3669	3971	4073	4114	4358	4453	4528	4604	4681	4708	4734					
5 year housing land supply	2.43	2.70	3.02	3.13	3.36	3.57	3.76	3.95	4.20	4.47	4.80	5.16	5.57	6.07	6.64					

Appendix 6: Five year housing land supply – Liverpool

	Pre-adoption				First five years					6-10 YEARS					11 - 15 YEARS				Total	
	2015/2016	2016/2017	2017/2018	2018/2019	2019/2020	2020/2021	2021/2022	2022/2023	2023/2024	2024/2025	2025/2026	2026/2027	2027/2028	2028/2029	2029/2030	2030/2031	2031/2032	2032/2033		2033/2034
LP requirement of 12426 annualised over plan period (2015 - 34)	654	654	654	654	654	654	654	654	654	654	654	654	654	654	654	654	654	654	654	12426
Years remaining	19	18	17	16	15	14	13	12	11	10	9	8	7	6	5	4	3	2	1	
Supply	387	294	306	348	572	769	829	675	824	874	871	870	919	919	949	947	947	946	945	14191
Residual requirement taking account of supply to date annualised over remaining plan period	654	669	691	715	739	751	750	743	750	742	728	710	687	648	594	505	358	63	-820	
5 year requirement	3270	3344	3454	3575	3697	3757	3750	3717	3748	3711	3638	3548	3434	3240	2969	2525	1788	315	-4100	
5 year requirement plus 20% buffer	3924	4013	4145	4290	4436	4508	4500	4461	4498	4453	4365	4258	4120	3888	3563	3030	2146	378	-4920	
5 year supply	1907	2289	2824	3193	3669	3971	4073	4114	4358	4453	4528	4604	4681	4708	4734					
5 year housing land supply	2.43	2.85	3.41	3.72	4.14	4.40	4.53	4.61	4.84	5.00	5.19	5.41	5.68	6.05	6.64					

Appendix 7: Five year housing land supply – Liverpool Phased

	Pre-adoption				First five years					6-10 YEARS					11 - 15 YEARS				Total	
	2015/2016	2016/2017	2017/2018	2018/2019	2019/2020	2020/2021	2021/2022	2022/2023	2023/2024	2024/2025	2025/2026	2026/2027	2027/2028	2028/2029	2029/2030	2030/2031	2031/2032	2032/2033		2033/2034
Annual housing target	654	654	654	654	450	450	500	500	500	550	600	700	700	700	800	810	850	850	850	12426
Years remaining	19	18	17	16	15	14	13	12	11	10	9	8	7	6	5	4	3	2	1	
Supply	387	294	306	348	572	769	829	675	824	874	871	870	919	919	949	947	947	946	945	14191
Backlog/Surplus		-267	-627	-975	-1281	-1159	-840	-511	-336	-12	312	583	753	972	1191	1340	1477	1574	1670	
Backlog/Surplus annualised over remaining plan period		-15	-37	-61	-85	-83	-65	-43	-31	-1	35	73	108	162	238	335	492	787	1670	
5 year requirement + (5x annualised backlog/surplus)	3066	2936	2892	2859	2827	2914	2973	3063	3203	3256	3327	3346	3322	3200	2969					
5 year requirement plus 20% buffer	3679	3523	3471	3430	3392	3497	3568	3676	3843	3907	3992	4015	3987	3840	3563					
5 year supply	1907	2289	2824	3193	3669	3971	4073	4114	4358	4453	4528	4604	4681	4708	4734					
5 year housing land supply	2.59	3.25	4.07	4.65	5.41	5.68	5.71	5.60	5.67	5.70	5.67	5.73	5.87	6.13	6.64					

Appendix 8 – Distribution of homes across the borough (2015 – 2034)

