

GUILDFORD LOCAL PLAN EXAMINATION

Examination Statement

PREPARED BY:



Woolf Bond Planning
Chartered Town Planning Consultants

On behalf of:

Taylor Wimpey UK Ltd

Taylor
Wimpey

MAY 2018



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Executive Summary

Taylor Wimpey UK Ltd maintain their objections to the soundness of the Submitted Local Plan for the following reasons:

- *The Plan is **not positively prepared** having regard to the derivation of the OAN, the approach to housing needs and housing delivery generally (having regard to the stepped trajectory).*
- *The Plan is **not justified** having regard to the spatial strategy and housing allocations, such that it cannot be said to be said to provide the most appropriate strategy when considered against the reasonable alternatives.*
- *The Plan is **not effective** and will fail to provide a five year supply of deliverable housing land and/or deliver the requisite amount of housing during the plan period.*
- *The Plan is **not consistent with national policy** having regard to the allocation and delivery assumptions relating to certain of the allocated sites.*

In order for the Local Plan to provide an appropriate basis for the planning of the Borough to 2034, Taylor Wimpey UK Ltd identify a need to prepare and consult upon necessary modifications to the Local Plan in the form of amended policy wording that would, inter alia:

- Increase the OAN from 654dpa to 717dpa and elevate the requirement to reflect unmet housing needs in the HMA. The requirement should be applied as an annual target across the plan period to respond to longstanding unmet needs.*
- Additional sites should be allocated in order to meet the increased housing requirement; and to ensure sufficient housing delivery in the early part of the plan period*
- As a function of (ii) above, reinstate the Policy A46 allocation at Normandy/Flexford¹*

The above changes are necessary in order to ensure a sound Plan.

¹ We acknowledge the Inspector's point in ID/3 that time will not be allocated to omission sites at the Examination. However, whether the Plan has assessed the reasonable alternatives is a matter of soundness, as is testing whether the spatial strategy (and hence site selection) is justified. In the event the Inspector identifies a need to increase the housing requirement and/or identifies the need for additional sites, the former A46 allocation at Normandy/Flexford is one such location that may need to be reconsidered by the Council. In this regard, we remain of the view that it represents an appropriate location for development having regard to the impact on the Green Belt, its location adjoining an existing train station (with direct links to Guildford), the ability to provide a secondary school in the early part of the plan period and the capacity of the local road network to accommodate development (Appendix B refers).

Technical Appendices

- i. Our representations are accompanied by the following supporting technical documents:
- Appendix A - OAN Technical Note (May 2018) (Turley)
 - Appendix B - Highways Technical Note (May 2018) (Odyssey)
 - Appendix C – Education Technical Note (May 2018) (EFM)

1. Plan Preparation

1.1 Is the Sustainability Appraisal ("SA") Adequate

1. The distribution strategy underpinning the spatial approach to the Plan is set out in Policy S2 and has evolved through the iterative process of the plan making exercise, with the various spatial options (including housing numbers) assessed as part of the Sustainability Appraisal(s)².
2. The SA has been revised throughout the plan making process and sites that were previously allocated in an earlier version(s) of the Local Plan but subsequently refined, removed or added have been assessed accordingly as part of the SA.
3. Whilst the SA is adequate for the purposes of the evidence base underpinning the Local Plan (when taken as a whole, including all the versions referenced at footnote 1 below), the outcomes must be treated with caution in so far as they have been drawn from 'other' evidence studies³ which may distort the assessment findings.
4. The content of the SA is of particular importance to the housing debate at Matters 2 to 5 (see our separate but related responses below). This includes the seven alternative spatial options⁴ (A to G) that were assessed in the Initial SA (2013) and carried forward to the 2014 SA. An eighth option was added in the June 2016 SA. All of the alternative approaches considered different levels of growth. Options A to B were at the lower end of the scale and F to G were at the higher end.
5. It is evident from the SA process that providing for housing growth in excess of the 12,426 figure in Policy S2 of the Submission Local Plan is not unsustainable. This is clear with reference to the following statements in the SA:
 - **"there is no clear preference for a particular option from a sustainability perspective" and "...Options D-G which favour higher levels of housing growth, on balance perform relatively well overall."** (see text in Box 6.2 of the 2016 SA (Pg14))
 - **"..Whilst Guildford is heavily constrained environmentally, it does not stand out as relatively constrained in the sub-regional context" and "...It is evidently the case that**

² Initial SA (2013), Interim SA (2014), SA of the Local Plan (June 2016), SA Update (June 2017)

³ Including for example the Council's Green Belt and Countryside Study.

⁴ Section 4.3 of Initial SA (2013)

under-supplying (housing) in Guildford would lead to a range of socio-economic problems, given that Woking is already under-supplying within the HMA.” (paragraph 6.3.10 (Pg22))

- Pg44 confirms that the mid-range growth options are all associated with pros and cons and necessitate close consideration, whilst stating in relation to the economy **“The Strategic Housing market Assessment is clear that housing under-delivery within the West Surrey Housing Market Area, which is also a Functional Economic Market Area, could result in economic growth opportunities going unrealised; hence options not making a contribution to meeting Woking’s unmet housing need would result in significant negative effects.”** It is then stated **“...As such, it can be seen that there is no clear best performing, or ‘most sustainable’ option. Rather, there is a need to establish a preferred approach after having determined how best to –trade-off’ between competing objectives, and in light of wide-ranging perspectives.”**
6. Evident from the above is that the SA findings support an appropriate uplift in the OAN in order to provide for housing growth in excess of the 12,426 dwelling requirement for the plan period.
 7. The SA process provides a basket of sites from which to choose from in seeking to identify additional site allocations in order to meet assist in meeting housing needs during the early part of the plan period and to meeting an increased OAN during the plan period as a whole.

2. Calculation of the Objectively Assessed Need for Housing (OAN)

Are the calculations contained in the West Surrey SHMA Guildford Addendum Report an appropriate basis for establishing the OAN for Guildford?

General

8. **A Technical Paper prepared by Turley (May 2018) is attached at Appendix A** which provides an update on the OAN submissions dated July 2017 and principally reflects on the Council's answers to the Initial Questions posed by the Inspector. This is intended to assist the Inspector in narrowing down points of difference in the latest evidence.
9. The earlier technical report accompanying the representations made by Taylor Wimpey in July 2017 concluded with a PPG compliant OAN of 717dpa (63dpa higher than GBC's figure of 654dpa).
10. The main difference between the Turley assessment and that presented by the Council reflects the application of a higher adjustment in order to respond to market signals and improve affordability in the borough. The Council's figure does not allow for a reasonable or appropriate adjustment to ensure that affordability issues will not worsen.
11. **A robust and sound, Framework-compliant annualised OAN would be 717dpa⁵ (13,623 for the plan period 2015 to 2034).** As such, **Policy S2 should be amended in order to recognise a minimum OAN of 717dpa⁶**, and to plan for a housing requirement which recognises the scale of the unmet needs of Woking (83dpa) and the impact of migration trends from London (51dpa).

2.1 Migration trends and unattributable population change (UPC)

12. The Council's assessment presents a modestly adjusted household projection which establishes a need for 577dpa. This projection assumes population growth of 0.7% per annum. This level of growth remains comparatively modest when benchmarked against the recent rates of annual change implied by official population estimates, which as the

⁵ Which figure does not include for the required allowance for unmet needs within the HMA or migration from London.

⁶ This equates to 13,623 dwellings during the plan period (2015 to 2035) and is 1,197 dwellings greater than the 12,426 dwellings planned for in Policy S2.

Council has highlighted, have been recently revised and therefore fully validated by the ONS (Figure 1.1 of the Turley Report).

13. The SHMA Addendum has considered the implications of UPC and concluded that no adjustment is required in Guildford. This position is supported based on the Council's evidence. The more recent revisions published by ONS suggest a considerably more modest correction and equally should not be used to justify an assumption that net migration will fall *further* below past trends, or by implication a reduction from the concluded demographic need for 577dpa. To do so would clearly risk underestimating the housing needed to accommodate projected change in the population of Guildford.

2.2 Student migration and its impact on the housing market

14. For the reasons set out at paragraphs 1.10 to 1.12 of the accompanying Turley Assessment, the allowance for student numbers in terms of housing need/demand (+23dpa) is clearly justified.

2.3 Market signals and its impact on the housing market

15. The Council's approach fails to make an appropriate adjustment for market signals and the issue of housing affordability, which matters are addressed at paragraph 1.13 onwards of the Turley Assessment.
16. It is considered that the advanced OAN of 717dpa, which allows for a separate 10% uplift and therefore a cumulative adjustment close to 20% to address worsening affordability, will have a more positive impact on improving affordability. It is evident that the level of new homes implied by this adjustment⁷ has also previously been assessed as representing a sustainable level of development by the Council and therefore must also be considered to be realistic.

2.4 The Need for Affordable Housing

17. In recent years levels of affordable housing provision in the borough have been extremely low, at only 62 gross affordable homes provided annually (2009 – 2016), or less than 12%

of the annual need⁸. As a result, and as at 31 March 2018 there were 2,197 households in Guildford on the waiting list for affordable housing. This represents an acute problem.

18. In the context of seeking to maximise the level of provision in the face of a significant calculated need for affordable housing it is apparent that a higher level of provision has previously been considered as deliverable and sustainable by the Council through earlier iterations of the draft plan (see also the SA and our response to Q 1.1 above).
19. In this context the Council's decision to suppress rather than increase the housing need cannot be viewed as reasonable and is clearly unsound. It is considered that in taking account of affordable housing need it is clear that emphasis should be placed on the evidence indicating a higher OAN.

2.5 Employment Growth

20. The Council's justification for a reduction in the OAN is suggested to be on account of a purported downgrading of the scale of likely job growth forecast in the borough. This is an unduly pessimistic response given the borough's historic economic performance and the growth sentiments of the Plan.
21. The 2017 SHMA Addendum's OAN is predicated on an employment growth rate of 0.7% per annum, compared with the 0.9% previously assessed as likely in the 2015 SHMA. The latest Experian forecast confirms that a 0.9% growth rate per annum remains appropriate⁹ notwithstanding influences on the economic as a result of Brexit.
22. For the reasons set out at paragraph 1.29 onwards of the Turley Report, the approach adopted in the 2017 SHMA Addendum is unduly pessimistic. Stronger job growth is likely to materialise which without adequate housing provision could serve to exacerbate unsustainable commuting patterns. Again this provides evidence to support a higher OAN.

⁷ As set out at Figure 2.1 the impact of the combined adjustment produces a need for 694dpa prior to the separate uplift applied to accommodate growth in student numbers. The previous iteration of the Draft Plan sought to provide for the earlier concluded OAN of 693dpa (2015 SHMA).

⁸ Table 4.4 of the Turley OAN review and critique (July 2017) submitted as part of Taylor Wimpey's representations

⁹ This is shown at Figure 1.3 of Appendix A

3 Unmet Need in the Housing Market Area

3.1 to 3.3

Is the plan sound in not making any allowance for unmet need arising elsewhere in the HMA?

23. Woking Borough Council's representations upon the Proposed Submission Local Plan (June 2017) objected to Guildford's failure to plan for Woking's unmet housing need.
24. A failure to plan for Woking's unmet results in an unsound Plan and fails to adequately address the identified housing crisis.
25. The failure to attempt to plan for any of Woking's unmet need means that a need for 1,575 homes would not be addressed before 2034. This would evidently serve to exacerbate already acute affordability issues and essentially lead to either the displacement of households outside of the HMA or an unsustainable increase in dependency on in-commuting to support employment. Guildford should accommodate 83dpa per annum (from the 2015 base date) in order to address Woking's unmet housing need. The housing requirement should also take into account the 2015 SHMA's analysis as to the additional pressure on housing in the borough resulting from migration flows from London (+51dpa). This evidence was directly referenced in the uplifting of the housing requirement in the Waverley Local Plan from the OAN and it is acknowledged that the Council's evidence shows that the strength of the commuting relationship between Guildford and London is stronger than that of Waverley¹⁰.
26. The Inspector should discount Guildford's "buck-passing" in arguing that Woking's needs should be met only by a new Local Plan in Woking and can be ignored for present purposes. It is understood that Woking has not commenced any material work on such a new LP, so it is clearly many years away. Were it to do so on the basis of the emerging Government methodology to which Guildford refers in its Q3 response, there would be a sizeable gap in HMA-wide provision, as the current Woking figure is much lower than the 2015 SHMA's OAN (while Guildford's figure rises to 789dpa). Guildford has submitted its plan for examination, and the examination must do its best to assess soundness in the current circumstances. Guildford should provide for what are indisputably Woking's/the HMA's unmet needs (just as Waverley has). If, in light of a later Woking Local Plan, there is

reason for Guildford to review its plan to reduce future requirements on the basis they are already being met elsewhere, that can be considered at the time.

¹⁰ 2015 SHMA Table 15 – Flow of 8,967 commuters to London from Guildford compared to 6,921 from Waverley.

4 Housing Trajectory

Is the plan's housing trajectory, which starts at a low level and rises towards the later years of the Plan period, a sound basis for meeting housing need?

4.1 The ability or otherwise of increasing the rate of delivery in the early years

27. It is clear from the evidence base, including the Infrastructure Delivery Plan ("IDP") as well as the representations submitted on behalf of a number of the statutory consultees (including Highways England) that there are a number of infrastructure constraints preventing the early delivery of certain of the larger strategic sites. This is the case for Slyfield (A24), Gosden Hill (A25), Blackwell Farm (A26) and Wisley (A35).
28. However, the stepped trajectory is also a function of the Council's approach to site selection and whilst there appears to be little if any prospect of increasing the rate of delivery from the allocated sites in the early years of the plan period, noting in particular the constraints associated with the large sites, there are opportunities to assist in increasing the rate of delivery on the early years of the plan through the allocation of additional sites.
29. Given the AONB, AGLV, flood and Green Belt constraints, and the Council's response to the Inspector's Q5 where they confirmed that they will not be relying upon an increased reliance on the delivery of sites from within the identified settlements and/or through intensification, it is difficult to see how delivery could be increased in the early years without additional Green Belt releases.

4.2 Whether the housing trajectory is realistic and deliverable and whether there are any identifiable threats to delivery; and

4.3 The key infrastructure improvements influencing the housing trajectory

30. We question the delivery assumptions in relation to Slyfield (A24), Gosden Hill (A25), Blackwell Farm (A26) and Wisley (A35).
31. There are significant infrastructure and viability threats to delivery, which issues are addressed in response to Matter 11 below, such that the Council's trajectory must be applied with caution. We remain of the view that the trajectory will not be realised resulting in a significant under provision of housing.

5 Five Year Housing Land Supply

Is the methodological basis for calculating the 5 year housing land supply sound? (The Council's calculations are based on a 20% buffer, the Liverpool methodology and a rising trajectory – see 3.50 of the Council's response to initial questions.)

32. The Council's response to the Inspector's Q3 acknowledges there has been a severe backlog in housing delivery which justifies the application of a 20% buffer for persistent under delivery of housing¹¹. The Council's solution in seeking to demonstrate a five year supply of deliverable housing land is to propose a stepped housing target combined with a Liverpool approach to spreading the backlog. This has the effect of suppressing the five year requirement, which contradicts best practice and the need to tackle the shortfall now. This fundamentally undermines the principles of the Framework which seeks to boost significantly the supply of housing and undermines the acceptance of the need to apply a 20% buffer that otherwise seeks to address the persistent under delivery of housing. The approach is a distortion of good planning practice and is not designed to address the national, regional and local housing crises.
33. Based upon the Council's approach to site selection and their assumptions in relation to the projected supply from the components of supply set out in Table 1 of the Council's Response, the cumulative completions are not anticipated to match the cumulative housing target (on an annualised 654dpa OAN basis) until 2025/26. On any assessment that cannot be said to represent a sound strategy and will fail to deliver the much needed new homes.
34. Given the infrastructure constraints in Guildford, namely the necessary upgrading works to the A3 (post 2024), we have sympathy with the conundrum between the application of Liverpool and Sedgfield to meeting the shortfall. However, we see no justification for applying an artificially constrained stepped housing requirement. If the Council is able to justify the application of the Liverpool approach to meeting the shortfall anticipated to be accrued in the first 4 years of the plan, it is evident that it is the supply side that needs to be revised (with additional sites to be identified) and not the approach proposed by the

¹¹ Paragraph 3.14 of the Council's response "recognises the benefits of meeting the backlog as quickly as possible" but suggests the circumstances in Guildford results in an unfeasibly high five year requirement that the Council does not consider to be achievable.

Council which is to artificially reduce the annualised requirement in the seven years of the plan period from adoption.

35. It is on this basis that we see merit in applying the approach to calculating the five year requirement at Appendix 6 to the Council’s Delivery Paper.

5.2 How many years’ supply of deliverable housing land exist at present, having regard to the housing trajectory, the current supply position, and the plan’s housing allocations?

36. On the basis of our response to Q5.1 above, and without critiquing the Council’s supply assumptions, we identify the following five year positions against the Council’s OAN of 654dpa and the OAN of 717dpa derived by Turley as at the 2019 base date:

	<u>654dpa</u>	<u>717dpa</u>
Requirement 2015 to 2019	2,616	2,868
Completions 2015 to 2019	1,335	1,335
Shortfall 2015 to 2019	1,281*	1,533**
Requirement 2019 to 2024	3,270	3,585
+ shortfall	+425	+510
Sub Total	3,695	4,095
+ 20% buffer	+739	+819
Total Requirement	4,434	4,914
Supply	3,669	3,669
Yrs Supply	4.13yrs	3.7yrs
Shortfall/Surplus	-765	-1,245

*1,281 dwellings to be met in 15 remaining years of the plan period (from 2019) = 85dpa

**1,533 dwellings to be met in 15 remaining years of the plan period (from 2019) = 102dpa

37. This assessment of the five year housing land supply position identifies a need to identify and allocate additional sites for development in the early part of the plan period.

5.3. Is the plan resilient and flexible enough to maintain 5 or more years’ supply of deliverable housing land going forward? (See Appendix 7 of the Housing Delivery topic paper).

38. Including for the reasons set out above, we do not consider that the Local Plan is flexible enough to maintain 5 or more years’ supply of deliverable housing land going forward. This is a function of the sites relied upon by the Council. The solution is to allocate additional deliverable sites that can take advantage of existing infrastructure.

9. Spatial Strategy, Green Belt and Countryside Protection

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

39. The spatial strategy set out in Policy S2 cannot be said to be sound in so far as it fails to provide for an appropriate level of housing growth and cannot be said to have been positively prepared. Moreover, the approach to the OAN cannot be said to be justified and Policy S2 cannot be said to represent the most appropriate strategy when considered against the reasonable alternatives.
40. It is clear from our assessment of housing need that the Council's approach to (i) the OAN; and (ii) stepping the housing trajectory is flawed and will result in serious and acute under delivery of housing in the first circa 14 years of the plan period
41. There are inherent infrastructure constraints associated with the strategic site allocations. This includes principally in relation to the provision of new road accesses, which is a material consideration of particular importance when considering the growth planned at Slyfield (A24), Gosden Hill (A25), Blackwell Farm (A26) and Wisley (A35). We address these matters in our response to the Issues at Matter 11. See also the accompanying technical report prepared by Odyssey in relation to highway matters at Blackwell Farm (Appendix B).
42. As set out in our response to Q1.1 above, the SA assessed a higher requirement to that which is planned for under Policy S2 and the spatial option of providing for 1,100 dwellings along with supporting infrastructure at Normandy/Flexford was considered to represent a sustainable growth option.
43. The majority of the Land at Normandy/Flexford is controlled by Taylor Wimpey UK Ltd and completions could be realised in the early part of the plan period in a location well served by public transport¹² (bus and rail).

¹² As recognised in the Council's Green Belt and Countryside Study Volume V. Flexford and Normandy has the highest public transport score of all the villages.

44. Development of the Policy A46 site at Normandy/Flexford can take advantage of the existing road and rail network without the need for significant up-front infrastructure costs and will have less of an impact upon the A31 into Guildford than would otherwise be the case with Blackwell Farm (See Appendix B for figures 1 and 2 showing traffic distribution).
45. The Council's Housing Delivery Topic Paper seeks to explain the rationale for deallocating the Normandy/Flexford site (paragraphs 4.29 and 4.30 refer). It is suggested that the site is a high sensitivity Green Belt site¹³ and the merits of that location were purportedly predicted upon the allocation delivering a school.
46. That suggestion is not borne out when one considers the evidence base:
- The Volume II Addendum to the Green Belt Study (Appendix 2) classed the site as high sensitivity as it was found to meet 3 of the 4 Green Belt purposes. This included in relation to purpose 2 which is to prevent neighbouring towns from merging into one another. The assessment concluded that the site currently prevents the settlements (villages not towns) of Normandy and Flexford from merging.
 - Volume 5 of the Study refers to the site as providing "opportunities for very good public transport connections" and "direct rail connections" with "the highest public transport scoring of all the villages". The assessment also lists the facilities that could be expected to be provided, including a local centre and village shop as well as a junior school and nursery. It is said that a potential major development in this location would "provide the opportunity for new facilities and improve the sustainability credentials of the settlement". It is further added that "the location of H12-A between Normandy and Flexford is considered to be particularly sustainable.
 - It was further recognised in the Volume 5 Study that development "would not significantly affect the openness of the wider Green Belt at this location within the Borough".
 - The assessment further states that the spatial separation between the settlements of Normandy and Flexford would be compromised by a major expansion, "it is recognised that Normandy and Flexford are almost connected at present by residential [properties following Glaziers lane." This assessment undermines the ranking of the site as performing 3 of the 4 Green Belt purposes and its high sensitivity ranking.
 - The site was identified in the 2014 Issues and options paper as a safeguarded site with no reference to the provision of a secondary school.

¹³ Unlike the comprehensive and well-judged assessment undertaken by Waverley in relation to their Green Belt assessment, the methodology for the Guildford Green Belt Study fails to provide an overall assessment/judgment as to the contribution made by a site to the Green Belt purposes. As such the weight to be attached to the conclusions of the Guildford Study must be reduced on account of the limitations of the methodology that has been applied.

- The site was allocated in the June 2016 Local plan to provide for approximately 1,100 new dwellings together with supporting infrastructure including a secondary school. However, the Council's earlier assessment of the site (pre 2016) concluded in relation to its sustainability merits before the provision of a secondary school on the site was even mooted.
 - The site remains sustainable and logical for development having regard to its role and function in Green Belt terms with or without provision of a secondary school.
47. On the basis of the foregoing, we remain of the view that the Plan fails to direct housing needs strategically to the right places.

9.5. Is the overall amount of land proposed to be released from the Green Belt, and the strategic locations for Green Belt release justified by exceptional circumstances.

48. The level of housing need to be met within Guildford Borough during the period 2015 to 2034 as well as the inability of the land within identified settlements and land within the countryside beyond the Green Belt to provide sufficient housing is clearly justified by exceptional circumstances.
49. In addition, the Council's failure to identify a Framework-compliant OAN and the inability of the identified sites to meet even the 654dpa target figure in the first 10 years of the plan period represents a fundamental failure of the Plan to provide for sufficient housing choice. This justifies the need to plan for additional Green Belt releases at sustainable locations.
50. Moreover, there is a need to ensure delivery of sufficient secondary school places, which is not likely to be met on the basis of the current strategy (Appendix C refers).

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

51. Including for the reasons set out in response to the questions above, the implications would clearly require additional Green Belt releases.

11. Site Allocations

A24 – Slyfield Regeneration Project

11.7 to 11.10

52. The questions are principally for the Council to answer in their Examination Statement. However, and whilst we acknowledge that some funding is in place (£7.5m from the Enterprise M3 Local Enterprise Partnership (LEP) and circa £600k from Central Government’s Growth Deal allocation), significant investment remains to be secured in order to ensure the project remains viable.
53. The principal constraints to realising the development potential of the site are (i) the relocation of the current Sewage Treatment Works¹⁴ (“SWT”); and (ii) highways.
54. The timeframe for realising first completions in 2024 is unrealistic in all of the circumstances:
- As far as we are aware, the funding and timing of the relocation and thereafter the necessary remediation works remains to be agreed.
 - We are not aware of any agreement as to the viability of the scheme (which proposal has been mooted for a number of years and is yet to be realised); and
 - There are in principal highway constraints, including providing for access from Bellfields Road, Slyfield Green and Woodlands Road.

A25 – Gosden Hill Farm, Merrow Lane, Guildford

11.12

55. There will be inherent delays in realising the site trajectory due to the scale of infrastructure required, including the ability to secure and thereafter deliver a satisfactory means of access including to and from the A3, which slip roads are required to be operational prior to first completions¹⁵.

¹⁴ The proposal is to relocate the SWT to an old landfill in the northern part of the site, (Infrastructure Delivery Plan (“IDP”)) project WCT6), thus enabling the redevelopment of the existing sewage works.

¹⁵ The ability to provide the means of access to and from the A3 is critical to the Council’s trajectory for this site being realised (50 completions in 2022/23).

11.14

56. We note the Inspector's concerns with the cumulative impact along with the development of the A43 site at Burn Common upon the diminution of the Green Belt along the A3 corridor. Development in these locations (sites A25 and A453) will be clearly visible from the A3 and would serve to emphasise the eastward "sprawl" of the Guildford urban area.

A26 – Blackwell Farm

11.15 Can access to this site from the south be successfully achieved from the A3/A31 without significant detriment to the landscape?

57. Development in this location is likely to have a significant detrimental impact upon the landscape character of the area, in a location that is highly visible from the A31 Hog's Back.
58. The Surrey Hills AONB lies to the immediate south of the area, with the proposed access from the A31 crossing the AONB from the Hog's Back Ridge where it will be clearly visible given the significant change in levels.
59. The proposed access road off the A31 will have a direct impact on the scenic beauty of the Surrey Hills AONB, a nationally designated landscape with the highest status of protection in relation to landscape and scenic beauty (Paragraph 115 of the NPPF). In addition, the proposed development will occupy the immediate foreground of the Hog's Back and would be visible from the scarp slope at the edge of the AONB. Development in this location would therefore have an adverse impact on the setting of the AONB (contrary to Planning Policy Guidance Paragraph: 003 Reference ID: 8-003-20140306) and would impact on the character of the AGLV (Contrary to emerging Policy P1: Surrey Hills Area of Outstanding Natural Beauty and Area of Great Landscape Value).
60. Given the scale of the proposed development the impact on landscape character is likely to be significant. The proposals will introduce major new highway infrastructure into a rural and highly sensitive landscape. As a result of the steep gradient of the scarp slope, significant earthworks could be required and the proposals could impact on key characteristics of the ridgeline, such as tree cover and landform. These are valued

components of the character of the ridge and are key landscape elements in views towards the Hog's Back from the north.

61. The provision of a major piece of highway infrastructure through the highly sensitive landscape of the AONB / AGLV would be impossible to fully mitigate. In addition, this section of the A31 is unlit and the proposals are likely to necessitate road lighting into the landscape within the AONB.
62. The area has a tenuous relationship to the urban area in the north east but is clearly separated from the majority of the urban edge by woodland and open countryside. To the east development in Guildford comprises the Surrey Research Park, however Blackwell Farm is remote and poorly related to other residential areas in the town. In addition, the principal access from the A31 is detached from the main urban area of Guildford, reinforcing the separation of this land parcel from other development in the town.
63. The proposed access from the Surrey Research Park to the north east of the area will extend for a minimum 100m through the Ancient Woodland at Strawberry Grove. Paragraph 118 of the NPPF states, 'planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss'. Again, the loss of an irreplaceable resource such as Ancient Woodland would be impossible to mitigate.
64. Development in this location will impact on an area of farmland with a distinctly rural character and would be poorly associated with the adjoining urban area. The detachment of the area from the built up area is emphasised by the fact that the principal access road passes through open countryside and is remote from the existing settlement.
65. In addition, development will impact on a number of important landscape characteristics including an area of Ancient Woodland and the character and setting of the Surrey Hills AONB and the AGLV. It will not be possible to fully mitigate the landscape and visual effects of development in this location.

11.16 Where would the traffic impacts occur and how would they be mitigated?

66. A detailed assessment of the access constraints and limitations imposed upon the development of Blackwell Farm are set out in the accompanying Technical Appendix (Appendix B). Key points to note from that assessment are as follows:

- It could take a minimum of four years, but potentially as long as six years to implement the access onto the A31 and thus be delivered by 2022 at the earliest and potentially not until mid-2024.
- The A3 Performance Study only assesses the delivery of 150 dwellings, 3,000sqm of employment and 171sqm of A-Class use floorspace being delivered from the site in the period to 2024. It makes no allowance for a secondary school. In addition, and perversely, the transport modelling undertaken does not distribute any of the traffic generated from the site in the period to 2024 through the Gill Avenue/Egerton roundabout or the Tesco roundabout.
- Figure 4.9 of the Strategic Highways Assessment Report (June 2016), shows a ratio to flow capacity (RFC) over 1 on the A31 to A3 northbound slip lane and appears to show this also for the proposed A31/Blackwell Farm site access signalised junction, on the eastbound approach. It is, therefore, clear that the already heavily congested section of highway where the A31 meets the A3 will become materially more congested.

67. A further constraint is in relation to education, which is a matter relevant to the spatial strategy as a whole (see Appendix C). The need for secondary provision is such that a secondary school will need to be operational by 2023. The trajectory for Blackwell Farm does not make that possible.

A35 – Wisley Airfield

68. The site is remote from existing settlements and is served by minor B roads such that there is limited existing supporting infrastructure. In terms of the access arrangements to serve the site, Highways England (“HE”) are maintaining their objection to the current appeal scheme in relation to the impact of the detailed junction design and its impact upon safety between the A3 Ockham and M25 junction 10. The SoS decision is awaited.

A43 – Land at Garlick’s Arch, Send
A43a – New North-facing Slip Roads on the A3

11.34

69. The existing settlement edge is well contained by woodland / trees along the route of Burnt Common Lane and Portsmouth Road. Expansion into this area would therefore leap frog an established boundary and impact on farmland which lies alongside the A3 road corridor.
70. Expansion in this area would be readily perceptible from the A3 road corridor. In conjunction with the proposed allocations at Gosden Hill (A25) and Burnt Common Warehouse (A58), there would be a substantial cumulative reduction in the separation between Guildford and the outlying villages of Send Marsh and Burnt Common, with the existing gap reducing to approximately 650m along the route of the A3. Furthermore Send Marsh and Send form a linear ribbon of development extending north towards Woking and there would be a cumulative erosion of the gap between Guildford and Woking, as a result of development in these locations.

11.35

71. The opportunity to integrate with the existing village would appear to be inhibited by the fact that the existing settlement form to the north west turns its back on Portsmouth Road (B2215), which means there are very limited opportunities for integration, beyond Send Marsh Road and Boughton Hall Avenue, with the latter being located some 385 metres from the western boundary of the allocation and providing an indirect point of integration to the wider settlement. The opportunity to provide a direct point of integration to Send Marsh Road is limited by the presence of Garlick’s Arch Copse and the existing woodland located adjacent to Kiln Lane, which are both designated Ancient Woodland.

APPENDIX A

Appendix A: Technical Update

Calculation of Objectively Assessed Housing Need in Guildford

May 2018

Introduction

- 1.1 Turley submitted a technical report entitled ‘*Housing Needs in Guildford – Review and Critique of the OAN Evidence Base*’ as part of the representations submitted by Taylor Wimpey to the consultation on the Submission Draft Local Plan (‘the Local Plan’) in July 2017.
- 1.2 This considered in full the evidence published by Guildford Borough Council (‘the Council’) at the time to support the justification for its lowering of the objectively assessed need (OAN) to 654 dwellings per annum (dpa) from the 693 dpa which underpinned the previous iteration of the Draft Local Plan.
- 1.3 In critiquing the Council’s evidence base – and taking into account the latest available datasets – **an alternative concluded OAN of 717 dpa was identified.**
- 1.4 There is broad agreement with regards to the majority of the inputs to the stepped calculation. The main difference reflects a judgement that a more significant and reasonable adjustment is required to respond to market signals and improve affordability in the borough. This is illustrated in the side-by-side comparison of the two OANs in Table 1.1.

Table 1.1: Calculation inputs to the 717 dpa OAN vs 654 dpa OAN

	SHMA Addendum	Turley	Variance
2014-based projections – the ‘starting point’	557	557	0
Adjusted demographic projection	577	577	0
Supporting employment growth	579	579	0
Responding to market signals ¹	631	694	+63
<i>Younger household formation rate adj.</i>	<i>631²</i>	<i>631</i>	
<i>Supply based adjustment (+10%)</i>		<i>694³</i>	+63
Accommodating growth of Surrey University	654	717	+63
Objectively assessed need (2015 – 2034)	654	717	+63

Source: Turley / 2017 SHMA Addendum

¹ Within our technical critique we confirm that we consider the adjustment made to younger household formation rates as being a demographic adjustment (paragraph 3.16) in accordance with the PPG albeit recognising that it is aimed at responding to evidence of worsening affordability. The 2017 SHMA Addendum, however, clearly references the outcomes of the adjustment at the conclusion of its chapter 5 ‘Affordable housing need and market signals’.

² In the SHMA this figure is presented at Figure 16 and is the preferred economic projection with the adjustment to household formation rates (9%) applied.

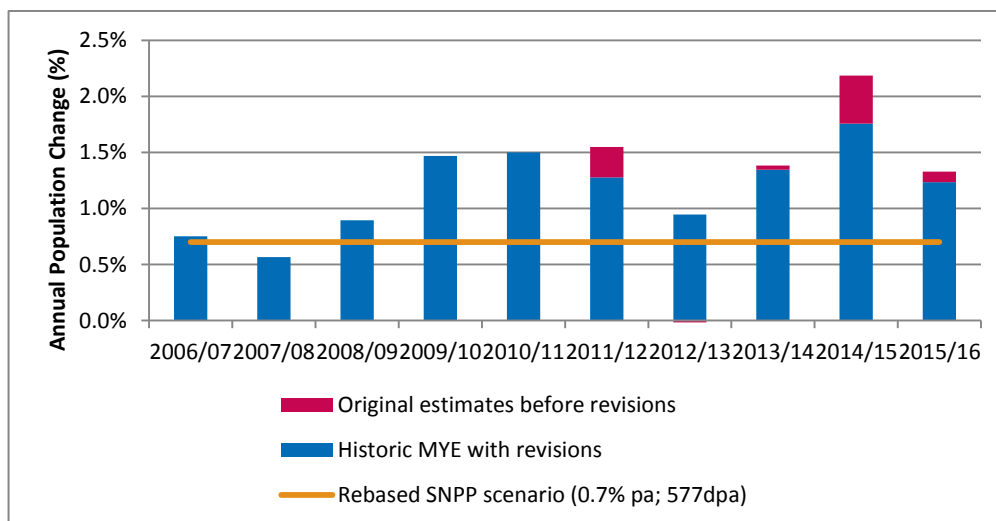
³ This is calculated by the application of a separate 10% market signals adjustment

Components of the OAN Calculation

Migration trends and unattributable population change

- 1.5 The Council’s OAN has consistently taken as its ‘starting point’ the latest official household projections⁴, an approach which we agree accords with the PPG.
- 1.6 The Council has not presented any updated evidence with regards to the household projection it uses as the basis of its OAN. It is noted, however, in the Council’s response to the Inspector’s initial questions that the Council and GL Hearn are considering the implications of the revised MYE datasets released by the Office for National Statistics (ONS) in March 2018 and the anticipated release of the 2016-based SNPP, due for publication in late May 2018.
- 1.7 We reserve a position to respond to additional evidence produced by the Council. However, in the context of the potential for altering the “baseline” to which the market signals adjustment is applied in the SHMA evidence we would strongly caution against any suggestion that this should be reduced from the 2017 SHMA Addendum figure of 577 dwellings per annum (dpa).
- 1.8 The projection underpinning the 577 dpa assumes population growth of 0.7% per annum. This level of growth remains comparatively modest when benchmarked against the recent rates of annual change implied by official population estimates, which as the Council has highlighted, have been recently revised and therefore fully validated by the ONS (Figure 1.1).

Figure 1.1: Comparing Revised Population Estimates with Projected Population Growth in Guildford



Source: ONS; GL Hearn

⁴ The 2014-based household projections represented the ‘starting point’ in the SHMA Addendum, and will remain as the ‘starting point’ until the 2016-based household projections are published on their provisional release date in September 2018.

1.9 The ONS revised population estimates result in a reduction in the 2016 estimate by only -0.8%. The revision is almost entirely due to evidence of higher levels of international emigration from Guildford than originally estimated by the ONS⁵. Furthermore, the modest scale of the correction can be contrasted with the more sizeable adjustment applied to population estimates between the last two Census years (2001 – 2011), some 7,123 persons⁶, described as unattributable population change (UPC). This is a relatively significant adjustment, when benchmarked against a net inflow of 9,289 internal and international migrants over the same period⁷. The SHMA Addendum continued to conclude that the official projections represented a reasonable basis for forecasting growth set in the context of analysis considering the implications of UPC. Minor revisions to these recent trends therefore should not be used to justify an assumption that net migration will fall *further* below past trends, or by implication a reduction from the concluded demographic need for 577 dwellings per annum. To do so would clearly risk underestimating the housing needed to accommodate projected change in the population of Guildford.

Student migration and its impact on the housing market

1.10 The SHMA evidence acknowledged the impact of a growth in student numbers at the University of Surrey on the need for C3 housing, making an additional allowance for 23dpa (3%). It is apparent that the SHMA evidence base has to date treated this uplift – correctly in our view – as a separate and distinct uplift on top of previous adjustments made to respond to affordability, supporting employment needs and/or demographics. This approach is supported. In its response to the Inspector’s questions the Council appears to now suggest that this forms part of its market signals adjustment.

1.11 There remains, however, no rationale for assuming that the provision of housing to accommodate this additional student population will have any impact on current and historic issues of affordability. The adjustment allows for a recognised growth in student numbers at the University of Surrey which will create additional residents ‘*over and above*’ the demographic projections⁸ and acknowledges the University’s growth expectations⁹. There is no indication that these growth plans have changed, and indeed there is evidence and confidence that they are being realised. The University had its ‘*highest ever student population*’ in 2016/17, and has outlined its continued plans for further investment¹⁰. This followed a period of sustained growth, with the University

⁵ Estimates of international emigration from Guildford have been revised upwards by 1,180 over the five years that were subject to revision (2012 – 2016). The cumulative impact of the revisions is 1,175 persons, confirming that other adjustments have had a marginal effect on the population. The revisions have reduced the estimated total net inflow by only 16% over the past five years, with most of the change (66%) concentrated in the period from 2014 to 2016 which evidently postdates the trend period of the 2014-based SNPP (2009 – 2014) and therefore has no bearing on its projection of population growth.

⁶ Table 1 of the SHMA Addendum

⁷ Although the precise cause of UPC cannot be verified, the adjustments applied to inter-Census population estimates to take account of this factor are equivalent to that which would have resulted from a 72% reduction in net migration. This provides important context around the significance of the recent 16% reduction in net migration estimates, which inherently limits any suggestion as to an on-going issue of notable over-estimation of migration and therefore population growth

⁸ GL Hearn (2017) West Surrey Strategic Housing Market Assessment: Guildford Addendum Report, paragraph 8.19

⁹ Guildford Borough Council (2018) Responses to Initial Questions 1 – 8, paragraph 7.7

¹⁰ University of Surrey (2017) The Surrey Ambition

having bucked wider trends in the higher education sector by receiving a record number of applications in 2015/16¹¹.

- 1.12 The adjustment evidently responds to meeting a recognised growing demand based on growing student numbers and therefore the provision will not represent a contribution to addressing the affordability implications of the long term under-provision of housing in Guildford of all types and tenures.

Market signals and the issue of housing affordability

- 1.13 The Council's OAN allows for only a 9% adjustment to respond to market signals and the direct impacts of a worsening of affordability. The Council has applied the adjustment to its re-based household projection (577dpa) and the economic-led projection (579dpa) to conclude a need for 631dpa (+52 dpa), once affordability adjustments (market signals) are taken into account. This is expressly set out within the SHMA Addendum (March 2017)¹² and the 'Review of Housing Needs Evidence across West Surrey HMA (November 2017)¹³. It is noted that the Inspector has questioned whether an uplift of this scale, specifically referencing the 9% adjustment, '*can reasonably be expected to improve overall housing affordability*'.
- 1.14 The Council's submission in response to a direct question from the Inspector on the evidence supporting its judgement in this regard is considered to be flawed. It conflates the cumulative impact of the separate adjustments applied to the OAN, following the PPG methodology, to distract from the limited scale of the adjustment it has applied to directly improve affordability. The Council also presents no evidence to either support its omission of a separate supply-led response (as required by the PPG) or to justify that its uplift will be sufficient to improve affordability.
- 1.15 The scale of the affordability issue in Guildford forms an important context:
- An individual with median earnings in Guildford would have been required to spend 12.5 years' earnings to purchase at the median house price in 2017, with this ratio having increased by almost one third (31%) since 2012 and rising notably since the start of the plan period¹⁴ (11.2);
 - Only 26 authorities outside London had a worse relationship between median house prices and earnings than Guildford in 2017, placing the borough amongst the 10% least affordable authorities outside the capital. Indeed, Guildford has ranked amongst the 10% least affordable authorities outside London in each of the past four years; and

¹¹ <https://www.surrey.ac.uk/mediacentre/press/2018/university-surrey-receives-record-number-ucas-applications>

¹² See paragraphs 5.44, which confirms the need for an uplift, and paragraph 5.48 which describes the nature of the uplift applied and Figure 24 which clearly shows the modest scale of the uplift associated with 'improving affordability'.

¹³ See Table 3 and paragraphs 3.9 and 3.10

¹⁴ ONS (2018) Housing affordability in England and Wales, 2017. Ratio of median house price to median gross annual workplace-based earnings

- The median price paid for housing in Guildford has increased by 41% over the five years to September 2017, far surpassing the 27% growth seen nationally over the same period¹⁵.
- More broadly, Guildford is located in a wider area characterised by affordability issues. Median house prices in Surrey were some 87% higher than the national average over the year to September 2017, housing in the county is less affordable than any other county in England relative to median earnings¹⁶ (12.9).

What level of housing provision could potentially be expected to improve affordability?

- 1.16 The Technical critique submitted in July 2017 applied the model advanced by the University of Reading using the Office for Budget Responsibility (OBR) house price forecasts (Appendix 1). This indicated that closer to 1,000 dwellings per annum would be required to at best maintain the affordability ratio recorded at the start of the plan period.
- 1.17 The extent to which the OAN established in the SHMA Addendum would be expected to impact on the affordability of housing was also tested using the same model. This concluded that rather than improving affordability this would lead to increasing issues with the affordability ratio rising over the plan period to reach 13.09 by 2034. In this context, as referenced by the Inspector in his initial questions and noted above, Guildford has already seen a notable increase in its affordability ratio over the first two years of the plan period, acknowledging that this has been set in the context of a level of provision considerably below even the *'starting point'* projection of need or the Council's purported OAN.
- 1.18 The Council's response to the Inspectors initial questions dismisses any such locally based consideration of the impact on affordability suggesting that in considering the link between house prices and supply consideration is required at a national level and that *'a sustained increase in housing supply across the region as a whole is needed'*¹⁷.
- 1.19 Whilst we challenge the implied position that the impact of any uplift in Guildford cannot be judged in some manner and following the Councils logic thereby negating the application of any such adjustment, it is readily apparent and indeed acknowledged by the Council that Guildford demonstrates symptoms of market imbalance which are more acute than those seen on average nationally and regionally. It is also equally apparent that the OAN purported by the Council results in an annual rate of provision which falls below the rate of provision the Government has identified as being required nationally to address needs in full and resolve the housing crisis.
- 1.20 The annual provision of 654 homes from the start of the plan period (2015) would grow the housing stock of Guildford by an average of 1.04% per annum to 2034. This falls some way below the 1.2% growth annually needed to realise the Government's aim of

¹⁵ ONS (2018) Median house prices for administrative geographies: HPSSA dataset 9

¹⁶ ONS (2018) Housing affordability in England and Wales, 2017. Ratio of median house price to median gross annual workplace-based earnings

¹⁷ Guildford Borough Council (2018) Responses to Initial Questions 1 – 8, paragraph 1.41

delivering 300,000 homes per year¹⁸. Achieving a comparable rate of growth in Guildford would, it is noted, require an average of 762 homes each year over the plan period (2015 – 2034).

1.21 The Council whilst not presenting comparable evidence to that presented above has sought at Figure 6 of its response sought to benchmark its adjustment against those considered reasonable by other Local Plan Inspectors. The information presented by the Council, however, is misrepresentative and equally, it is considered, fails to provide the supporting justification the Council suggests. In part, this stems from the Council's attempt to conflate all of the adjustments prescribed in following the PPG methodology with the adjustment made to respond to market signals. This is illustrated when considering the make-up of comparable adjustments made elsewhere, including a number of the authorities included in the chart produced by the Council:

- When referring to **Central Lincolnshire** (Lincoln, North Kesteven, West Lindsey), it is understood that the Council has attributed a 3% market signals uplift to each of the three authorities. It is apparent from the Inspector's report that this is not considered in isolation, with this uplift applied to an adjusted demographic projection which is some 47% higher than the starting point projection (2012 SNHP)¹⁹. This uplift would bear comparison with the 17% cumulative adjustment advocated by the Council. In this context, it is noted that the three authorities had affordability ratios of between 5.8 and 7.8 in 2017;
- Similarly there are examples, such as in **North West Leicestershire**, where in judging the reasonableness of a recommended separate market signals adjustment (10% in this instance) the Inspector has clearly framed the conclusion that no further uplift is required on the basis of a more significant cumulative adjustment. In North West Leicestershire, the Inspector concluded that in the context of affordability '*no further adjustment to the OAN is required*' on the basis that the economic-led OAN represented a 25% adjustment above the demographic need, noting that the 2017 affordability ratio in North West Leicestershire was 7.2; and
- On the basis of the Council's assertion that it is the cumulative adjustment which should be considered (i.e. including demographic and economic steps of the methodology) the rationale for the omission of OANs in other examinations is unclear. By way of example, the **Derbyshire Dales** Local Plan Inspector's report concludes with an OAN which reflects a 60% uplift from the 'starting point' (2017 affordability ratio of 9.48). In concluding that this OAN is reasonable and appropriate the Inspector acknowledges '*there are inter-relationships between adjustments for economic growth, market signals and affordable housing*'²⁰. Similarly in **Telford & Wrekin** the OAN identified by the Inspector in his report is some 72% higher than the 'starting point'. In concluding the OAN the Inspector

¹⁸ Growth from national housing stock recorded in 2016 by MHCLG Live Table 100 over the next decade (2016 – 2026)

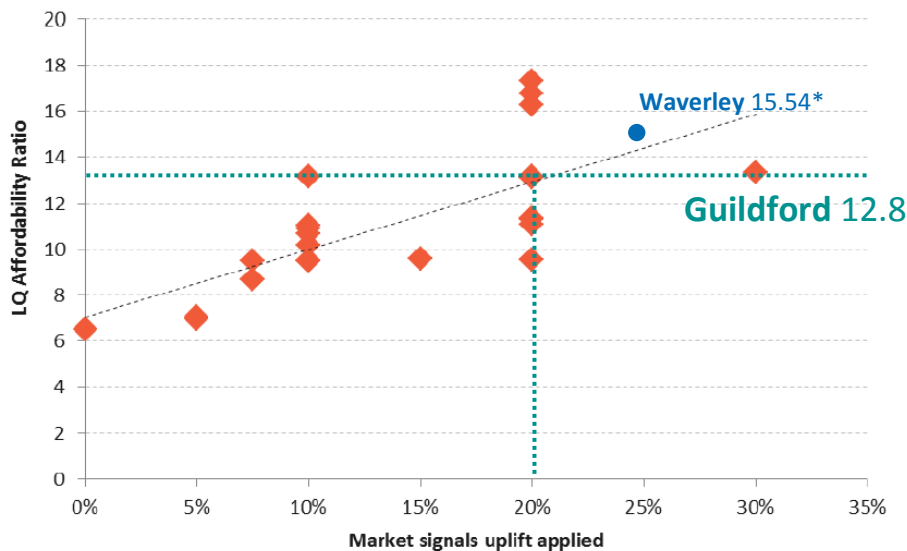
¹⁹ Central Lincolnshire Local Plan Inspector's Report April 2017, paragraph 43

²⁰ Derbyshire Dales Local Plan Inspector's Report November 2017, paragraph 56

clearly recognises that the scale of this uplift is an important determinant in concluding that no further uplift is required²¹ (2017 affordability ratio of 6.3).

- 1.22 It is apparent that the approach taken by the Council misleadingly combines to *overstate* the market signals adjustment made in Guildford, and *understate* the overall adjustments considered appropriate elsewhere. The analysis cannot therefore be presented as providing a meaningful contribution to arriving at a judgment as to a comparable or reasonable adjustment.
- 1.23 It is considered that for the purpose of this exercise reference should instead be usefully made to the chart presented in the Waverley Local Plan (and included in the Council’s November 2017 report at Figure 1).

Figure 1.2: Benchmarking Market Signals Uplifts Applied in Other Locations



Source: Lichfields analysis replicated from Waverley Local Plan submission evidence; Turley

* 2016 ratio cited by Inspector

- 1.24 It is noted:
- The chart seeks to present separate adjustments advanced either within SHMA evidence or considered reasonable by Local Plan Inspectors. This confirms that the Council’s 9% adjustment (which it advances as its equivalent market signals adjustment) is not adequate as a comparable separate adjustment when benchmarked in this way even where the 2015 ratio (10.9) is used. The Council in its November 2017 paper confirms this would suggest a 14% adjustment.
 - In arriving at a judgement as to the level of adjustment to make, Inspectors have taken account of the latest available evidence of affordability. For example, in the case of Waverley, direct reference is made to an affordability ratio recorded three years after the start of its plan period in the context of the Inspector

²¹ Telford & Wrekin Local Plan Inspector’s Report November 2017, paragraph 45

arriving at a conclusion on the adjustment required²². This is considered to conform to the PPG which stresses the need to take account of the latest evidence available²³.

- 1.25 It is considered that the advanced OAN of 717dpa, which allows for a separate 10% uplift and therefore a cumulative adjustment close to 20% to address worsening affordability, will have a more positive impact on improving affordability. It is evident that the level of new homes implied by this adjustment²⁴ has also previously been assessed as representing a sustainable level of development by the Council and therefore must also be considered to be realistic.

The Need for Affordable Housing

- 1.26 The SHMA Addendum confirms that over 1,200 homes per annum could potentially be required to meet the affordable housing need in full²⁵.
- 1.27 Over recent years levels of affordable housing provision in the borough have been extremely low, at only 62 gross affordable homes provided annually (2009 – 2016), or less than 12% of the annual need²⁶. As a result, and as of 2017 (1 April) there were 2,157 households in Guildford on the waiting list for affordable housing. This represents an acute problem.
- 1.28 In the context of seeking to maximise the level of provision in the face of a significant calculated need for affordable housing it is apparent that a higher level of provision has previously been considered as deliverable and sustainable by the Council through earlier iterations of the draft plan. In this context the Council's decision to suppress rather than increase the housing need cannot be viewed as reasonable and is clearly unsound. It is considered that in taking account of affordable housing need it is clear that emphasis should be placed on the evidence indicating a higher OAN.

Employment growth

- 1.29 The Council's evidence base confirms that it considers that one of the principal factors supporting the reduction in the OAN from the 693dpa in the 2015 SHMA to the 654dpa in the 2017 SHMA Addendum is a downgrading of the scale of likely job growth forecast in the borough. This is an unduly pessimistic response given the borough's historic economic performance and the growth sentiments of the Plan²⁷.
- 1.30 The 2017 SHMA Addendum's OAN is predicated on an employment growth rate of 0.7% per annum, which translates into the forecast generation of 12,900 jobs over the plan period (2015-34). This forecast of job growth is based on average of the three

²² Planning Inspectorate (February 2018) Waverley Borough Local Plan, Inspector's Report, paragraph 20

²³ PPG Reference ID 2a-016-20150227

²⁴ As set out at Figure 2.1 the impact of the combined adjustment produces a need for 694 dpa prior to the separate uplift applied to accommodate growth in student numbers. The previous iteration of the Draft Plan sought to provide for the earlier concluded OAN of 693 dpa (2015 SHMA).

²⁵ Guildford Borough Council (2018) Responses to Initial Questions 1 – 8, paragraph 1.29

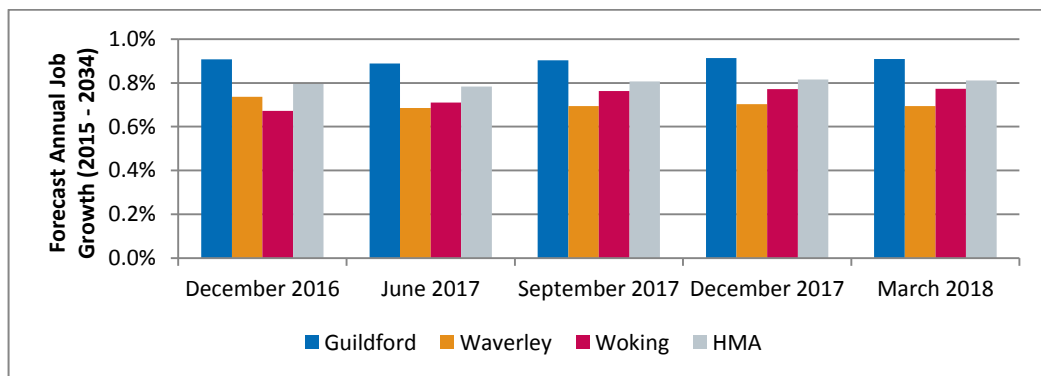
²⁶ Table 4.4 of the Turley OAN review and critique (July 2017) submitted as part of Taylor Wimpey's representations

²⁷ See the economy strategic objectives on page 22 of the Plan which confirm the objective of enhancing Guildford's role as one of the County's key employment locations and to reinforce its role as a world leader in innovation and research. It is noted in Turley's July 2017 OAN critique that the growth sentiments expressed in the previous iteration of the Plan were supported by the LEP (paragraph 3.25).

main forecasting houses' predictions in November/December 2016, now close to a year and a half ago. This contrasts with the 2015 SHMA which confirmed that a stronger level of job growth in Guildford was likely based on a 0.9% per annum growth which suggested job growth of 17,700 jobs over the period 2013 – 2033.

- 1.31 The latest Experian forecast (March 2018) confirms a forecast growth rate of 0.9% growth rate per annum. This forecast shows a high degree of consistency with Experian's forecasts over the last 12 months (Figure 1.3) and confirms Experian's view that this rate of growth is appropriate notwithstanding their assessment of the impact of Brexit.

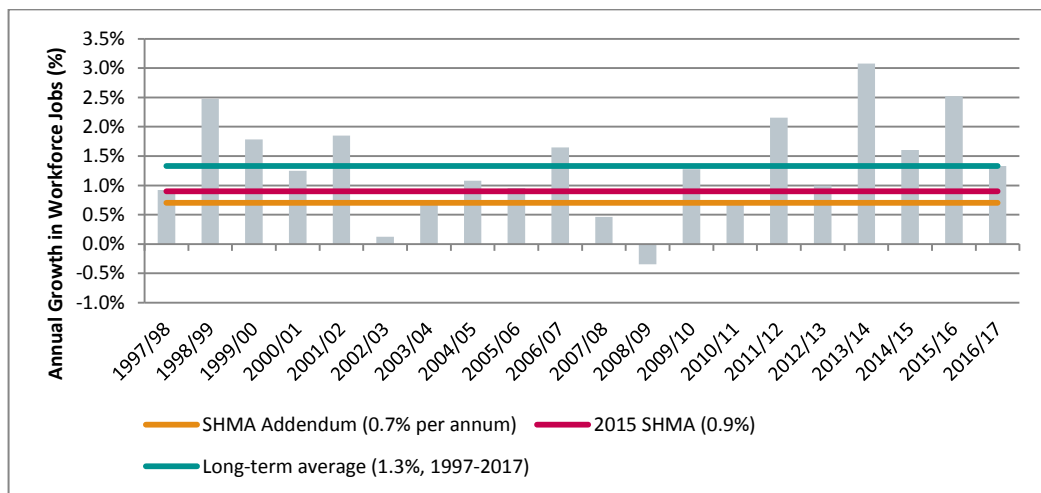
Figure 1.3: Experian forecast job growth various iterations between Dec 2016 and March 2018



Source: Experian, 2018

- 1.32 This level of forecast growth can be considered in the context of historic rates of growth in the borough (Figure 2.4). A growth rate of 0.7% or indeed 0.9% per annum evidently falls substantially below the long-term annual rate of growth achieved (1.3%) and it is noted that in only three years has a growth rate of less than 0.7% been recorded and in only five years a growth rate of less than 0.9%.

Figure 1.4: Comparing Forecast Job Creation with Historic Annual Growth



Source: Experian, 2018

- 1.33 Setting the Council's reliance on a reduced forecast job growth in this context highlights the risk that an unduly pessimistic approach has been adopted in justifying the reduced OAN. It is reasonable to suggest that stronger job growth is likely to materialise which without adequate housing provision could serve to exacerbate unsustainable commuting patterns. Again this provides evidence to support a higher OAN.

Unmet Need in the Housing Market Area (HMA)

- 1.34 The Council's November 2017 report²⁸ presents its updated conclusion on the OAN across the HMA. Drawing upon the latest published position for Guildford (654 dpa²⁹), Waverley (507 dpa³⁰) and Woking (517 dpa³¹) a HMA OAN of 1,678 dpa is concluded. It is noted that this aligns closely with the scale of OAN for the HMA concluded in the 2015 SHMA (1,729 dpa) with a difference of only 51 dwellings per annum.
- 1.35 On the basis of the adopted plans in the other two authorities in the HMA and on the basis of the Council's own concession that there is no updated PPG / NPPF compliant OAN for Woking from that presented in the 2015 SHMA it is readily apparent that the acknowledged residual need for 1,575 dwellings remains unaccounted for within the planned provision across the HMA. The application of a comparable approach to that taken in Waverley to spread the unmet need over the full plan period, a 19 year period albeit with a base date of 2015, would indicate the same allowance for an additional 83 dwellings per annum.
- 1.36 The failure for Guildford to attempt to plan for any of these needs over its plan period would mean that as a minimum on the basis of current planned provision in other parts of the HMA the unmet need of 1,575 homes would not be addressed before 2034. This would evidently serve to exacerbate already acute affordability issues and essentially lead to either the displacement of households outside of the HMA or an unsustainable increase in dependency on in-commuting to support employment.
- 1.37 In the Council's response to the Inspector's initial questions reference is made to a recognition that the Plan's across the HMA will be expected to be reviewed in the near future, specifically referencing Woking. In this context the Council presents the scale of need implied by the Government's proposed standard method which forms the basis of its ongoing consultation on proposed revisions to the NPPF. Whilst for Woking the proposed standard method implies a reduced 'need' the Council omits to present the indicative picture of need cross the HMA (Table 1.2)³².

²⁸ Review of Housing Needs Evidence across West Surrey HMA, November 2017

²⁹ 2017 SHMA Addendum

³⁰ Adopted Waverley Local Plan, 2018

³¹ 2015 SHMA

³² This is based on the data accompanying the 'Right homes, right places' consultation (September 2017), which continues to represent the most up-to-date interpretation of the Government's proposed standard method. Whilst the affordability ratios have continued to rise in Guildford and Woking across all authorities the scale of the ratio means that they are subject to the 40% cap and therefore the need figure will not be updated until the release of the 2016-based household projections in September 2018.

Table 1.2: Impact of Proposed Standard Method

	Existing OAN, <i>dwelling per annum</i>	Proposed standard method			Variance
		Annual projected household growth <i>(2014-based; 2016 – 26)</i>	Market signals adjustment, capped at 40%	Housing need based on proposed method <i>(dpa)</i>	
Guildford	654	564	40.0%	789	+135 (+21%)
Waverley	507	384	40.0%	538	+31 (+6%)
Woking ³³	517	307	40.0%	430	-87 (-17%)
HMA	1,678	1,255	–	1,756	+79 (+5%)

Source: Turley analysis; DCLG, 2017

1.38 It is readily apparent that across the HMA, under the Government’s proposed method, need would be elevated when compared with the Council’s latest evidence based position. This would suggest elevated higher potential level of unmet need based on current planned levels rather than a reduction. Specific reference is made at paragraph 61 of the revised NPPF that in determining the number of homes needed *‘any needs that cannot be met within neighbouring areas should also be taken into account’*³⁴. This strongly challenges the assertion made by the Council that the scale of unmet need for housing will be reduced at the point at which future Local Plan reviews occur. A failure to recognise unmet needs in the current round of Local Plan’s will only compound this issue going forwards and serve to further exacerbate acknowledged significant affordability issues across the HMA.

Understanding the impact from London

1.39 It is considered that the housing requirement should also take into account the 2015 SHMA’s analysis as to the additional pressure on housing in the borough resulting from migration flows from London (+51dpa). This evidence was directly referenced in the uplifting of the housing requirement in the Waverley Local Plan from the OAN. In comparing the strength of the relationship with London between Waverley and Guildford it is noted that the 2015 SHMA identified a higher number of commuting flows from Guildford into London than Waverley³⁵. The 2015 SHMA also acknowledged the *‘important interaction with London in the demographic projections, recognising a significant level of migration between each of the three authorities to/from London’*³⁶. This illustrates the comparatively strong relationship with the capital and the need to take this into consideration.

³³ Indicative figure produced by Government in September 2017 was capped at 40% above the housing requirement (292dpa) adopted in October 2012. This requirement is now older than five years, and housing need is now capped at 40% above the latest household projections

³⁴ Draft NPPF, March 2018, paragraph 61

³⁵ 2015 SHMA Table 15 – Flow of 8,967 commuters to London from Guildford compared to 6,921 from Waverley.

³⁶ West Surrey Strategic Housing Market Assessment, September 2015, paragraph 4.67

APPENDIX B

Project Name : Examination Statement - Appendix B
Job No. : 14-262
Note Title : Guildford Borough Council Submission Local Plan Examination in Public Highways
Technical Note
Author : BM
Approved : BM
Date : May 2018

- 1.1 This Highways Technical Note sets out Odyssey’s highways view with respect to the Blackwell Farm (Policy A26) site in Guildford Borough Council’s (GBC) Submission Local Plan (LP). This report references the Submission LP documents and transport evidence base reports throughout and is an appendix to the Examination Statement.

Access

- 1.2 It appears from the University of Surrey’s (UoS) ‘Blackwell Park Vision and Development Concept’ (July 2017) document that the access road, from Down Place, will be a new road broadly running adjacent to the existing track, which itself will form a new footpath / cyclepath. It appears the new road will require further land to that set out in the Policy A26 blue line boundary for the site. The new access road will also require a new bridge over the A31 to A3 northbound slip road and therefore involve Highways England (HE).
- 1.3 It is likely that it would take a minimum of four years, but potentially up to six years to implement the access onto the A31, which would therefore, only be realised by the middle of 2022 at the very earliest and potentially could take until the middle of 2024. This includes for planning approval, Section 278 and Section 38 technical approvals and build. Construction costs for these works are estimated to be c.£3 million; however, these would be likely to materially rise in the years before construction would begin.
- 1.4 In the UoS’s ‘Blackwell Park Vision and Development Concept’ document the land parcel shown is materially larger than that shown in Policy A26 and indicates that the eastern access will route directly into the Surrey Research Park (SRP) via Priestly Road, which then connects to Gill Avenue. The access route shown on the Illustrative Framework Master plan through the woodland is not part of the red line LP site boundary shown within the UoS document. Therefore, it is considered that this route cannot, at this time at least, be guaranteed.
- 1.5 On-street parking is clearly a material concern with respect to the delivery of the eastern access of the Blackwell Farm site. The material further vehicle traffic generated will only further exacerbate this already known existing on-street parking issue; refer to Paragraph 2.93 of the



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Infrastructure Delivery Plan (IDP). There have been no proposals put forward to alleviate this issue.

Accesses, Development Routeing and Through Routeing

- 1.6 The Blackwell Farm site will have two vehicular accesses. SCC's own advice, set out in the Surrey Design Technical Appendix, states in Paragraph 3.2.5 that '*...sites serving in excess of 100 dwellings should have more than one point of access to the existing highway network and this is desirable for all sites serving in excess of 50 dwellings. This is to ensure that there is a route for the emergency services, even if one access becomes blocked, and also to distribute traffic through the development*'.
- 1.7 Clearly the Blackwell Farm site is materially in excess of this development quantum and it would be good practice, and indeed considered fundamentally necessary, for there to be two accesses that any future residents and visitors to the site could use. Furthermore, this has material implications with respect to any dwellings coming forward early in the LP period, as even on a design basis no more than 100 dwellings should come forward based on SCC's own design guidance.
- 1.8 The Strategic Highways Assessment Report (SHAR, June 2016) and the Study of Performance of A3 Trunk Road Interchanges in Guildford Urban Area to 2024 Under Development Scenarios (A3 Performance Study, April 2018) both allow, in their traffic modelling analysis, any development vehicles to use either access for the site and for external vehicles to route through the site. There is no prescription for limiting the eastern access to employment vehicle trips only (Paragraph 4.7.3), using ANPR to (try to) avoid non-development through movements or allowing only a limited number of dwellings or employment buildings access via the Priestley Road (and Gill Avenue) route.
- 1.9 As set out in Paragraph 4.7.4 and Figure 4.3 of the SHAR, in the AM peak, nearly half (47%, 484 vehicles) of the development generated traffic would wish to route through the SRP, given the option of accesses to use. Furthermore, as set out in Paragraph 4.7.5 and Figure 4.3, for the AM peak, there would be 194 vehicles routeing through the development; although it is acknowledged that these could be somewhat higher due to the limitations in the model. This is a material volume of through traffic.
- 1.10 There are clearly some materially important questions remaining with respect to what the proposed strategy is for both through traffic and development traffic routeing. These options need to be analysed and conclusions reached before Blackwell Farm can be considered a suitable development option in the LP.

A3 Performance Study – Development Quantum

- 1.11 Paragraph 4.2.1 states that Submission LP development planned between 2017 and 2024 has been included in the analysis. This includes for 150 dwellings, 3,000sqm of office and 171sqm A-class use for Blackwell Farm (Guildford 017a MSOA); refer to Table 10. Table 10 does not



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include any school provision; therefore, based on this analysis no early provision for the secondary school listed in Policy A26 would come forward before 2024.

A3 Performance Study – Traffic Distribution

- 1.12 The matrix tables in Appendix B show the vehicle trip distribution. Not only is this level of detail insufficient for suitable analysis to be made with respect to the vehicle trip distribution of the development sites, but it is certainly questionable. With no detail provided, it is not clear where the traffic generated from the initial element of development would access onto the existing highway network; however, it would be reasonable to assume that this should be via the proposed access onto Priestley Road (and then Gill Avenue). This would mean that by 2024 it is not expected that the southern site access onto the A31 would be implemented and therefore, no through movements would be possible and thus are not analysed.
- 1.13 Therefore, it appears incorrect that, as shown in Appendix B, none of the Blackwell Farm (Guildford 17a) trips have been shown to travel through the Egerton Road / Gill Avenue signalised (Hospital) junction (J4) or the Tesco roundabout (J5); so, the analysis undertaken later in the report appears to be fundamentally flawed. The result of this means that the development traffic impact up to 2024 at the Hospital junction, the Tesco roundabout and the A3 northbound off-slip has been materially underestimated.

A3 Performance Study – Egerton Road

- 1.14 Key, with respect to the Blackwell Farm site, is the queuing at the A3 northbound off-slip at the Tesco roundabout, which is a direct result of insufficient capacity at the Hospital junction. Improvements to these two junctions, as part of the Sustainable Movement Corridor 1 (SMC1), are predicted to prevent queuing from the Hospital junction back to the Tesco roundabout and will allow for better management of traffic from the A3.
- 1.15 These junction improvement works would be required before the Development Plan policy compliant development, let alone the Submission LP development, comes forward, as demonstrated by the results shown in Table 21 and comments in Paragraph 5.3.4. No junction output results appear to have been made public; therefore, more detailed analysis cannot be made with respect to validity of the traffic analysis.
- 1.16 The highway improvement works shown in Appendix D would include Gill Avenue having two lanes in each direction; however, it is considered that there are material highway safety concerns with such a scheme, as drivers exiting the office car parks on the south side of Gill Avenue would have to cross two lanes of westbound traffic enter onto two lanes of eastbound traffic.

A3 Performance Study – A3 Slips Merge and Diverge

- 1.17 Using the ATC data, from the HA Web Tris site, to determine whether any changes are required to the merge and diverge layouts on the A3 is flawed, as the ATC data only captures actual vehicle flow and not the demand vehicle flows, which on a congested network is likely to be materially



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higher. Therefore, using this data as the basis for predicting future flows with development scenarios is also flawed and does not represent the actual likely traffic demand for those links.

A3 Performance Study – Summary

- 1.18 It is considered, for the aforementioned reasons, that alternative development sites need to be explored that would result in significantly less traffic impact on the A3 through Guildford and to the M25 Junction 10; especially compared to the Blackwell Farm development site. One such development site is the omission site at Normandy / Flexford, which could come forward in the early years of the LP and would have materially less traffic travelling along the A3 through Guildford, given the routeing options available by virtue of the location of the site.
- 1.19 In this regard, **Figure 1** shows the vehicle trip distribution for 1,000 dwellings at Normandy / Flexford, whilst **Figure 2** shows this with the potential internalisation and modal shift, should a secondary school, primary school and local centre also come forward on the site, and with direct access provided to Wanborough railway station.

A31 / Down Place Signalised Junction - GBC Infrastructure Delivery Plan

- 1.20 It is considered that the proposed A31 / Down Place signalised junction will only exacerbate the existing queuing back from the A3 to the A31, as stated in the IDP, and the implications of this have not been sufficiently analysed.

A31 / Down Place Signalised Junction - Highways England LP Representations

- 1.21 HE's LP representations response, with respect to Policy A26 (Blackwell Farm), noted the '*...through vehicular link between the A31 Farnham Road and Egerton Road will now be controlled to provide a new route for employees, residents and emergency services*'. It is, however, unclear how externally generated through movements would be 'controlled' and no detail in this regard has been provided.
- 1.22 HE state that they are keen to work with GBC / the developer to '*understand the degree of impact reduction on the A31/A3 junction ahead of a potential A3 scheme*'. Therefore, the UoS have clearly not demonstrated to HE any details with respect to how the proposed A31 / Down Place signalised junction would not result in material detriment to the Strategic Road Network (SRN).

Sustainable Movement Corridor 1 – Topic Paper: Transport (December 2017)

- 1.23 The latest proposals at the Tesco roundabout and along Egerton Road, refer to Appendix D of the A3 Performance Study, both reduce bus priority and highway capacity compared to that set out in Appendix 7 of the Topic Paper: Transport.
- 1.24 This is considered a failing with respect to SMC1, where, as set out in Paragraph 2.5 of the Local Committee (September 2017) report buses are often unable to run to schedule along this section due to the lack of bus priority measures. This is further the case, as Policy A26 requires bus services to be provided between the Blackwell Farm site and Guildford town centre.



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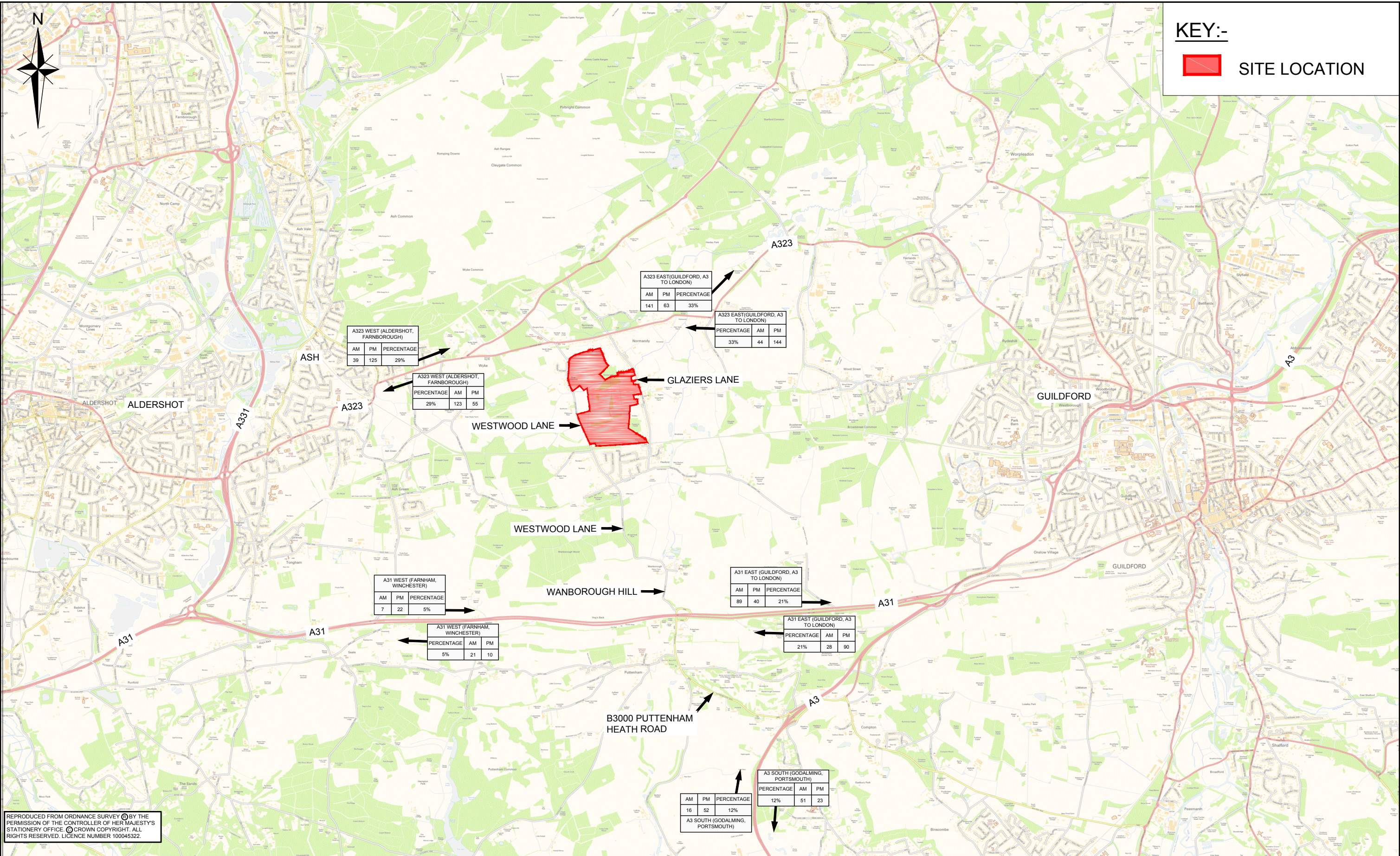
Highways England Submission Local Plan Response

- 1.25 The stance by HE, in their Submission LP response, is critical to note with respect to housing delivery. The Normandy / Flexford omission site is further from Guildford than the Blackwell Farm site and provides more routeing options than Blackwell Farm to enable much of its generated traffic to avoid the A3 and the A31 east (towards Guildford), such as distributing to the A331, B3000 and A31 west. **Figures 1 and 2** refer (attached).

2031 End State Operation – Strategic Highways Assessment Report (June 2016)

- 1.26 This section sets out the impact of the Blackwell Farm development once complete.
- 1.27 As noted in Paragraph 4.9.5, of the SHAR, although the Tesco roundabout is proposed to be improved the junction operation will deteriorate, as the proposed improvement is not sufficient to cater for the change (increase) in trip patterns, due to the trips using the eastern access of the Blackwell Farm development. Further to this, Paragraph 4.9.5 suggests improvements to the Hospital junction and although improvements to this junction have been tested up to 2024, in the A3 Performance Study, this does not appear to have been undertaken for the 2031 end state scenarios.
- 1.28 Figure 4.9 shows an RFC over 1, in the AM peak, on the A31 to A3 northbound slip lane and appears to show this also for the proposed A31 / Blackwell Farm site access signalised junction, on the eastbound approach. It is, therefore, clear that the already heavily congested section of highway where the A31 meets the A3 will become materially more congested. Where vehicles move into the correct lane prior to the A31 to the A3 northbound slip there is currently material delay due to weaving traffic; however, it is considered that in future this will likely become a slow moving, even static, queue.
- 1.29 Paragraph 5.1.7 goes on to state that ‘...should the RIS schemes not be forthcoming then the residual cumulative impact of the Proposed Submission Local Plan on the highway network could be considered severe’ and that should the RIS schemes not be forthcoming ‘...then the quantum and location of development as proposed may have to be amended’. This is a material consideration, as although the A3 Road Investment Strategy (RIS) SRN2 scheme has Department for Transport (DfT) funding, this appears to only include part of the funding required to deliver this scheme. Despite the LP Policy ID2 committing GBC to work with HE on their RIS schemes, it is not clear whether developers have committed to fund the costs that the DfT funding will not cover to deliver the SRN2 scheme.

P:\14-262 - Land at Normandy, Guildford\Tech\Acad\Drawings\Figures\2018 New Figures\14-262 Figure 1 Traffic Distribution.dwg



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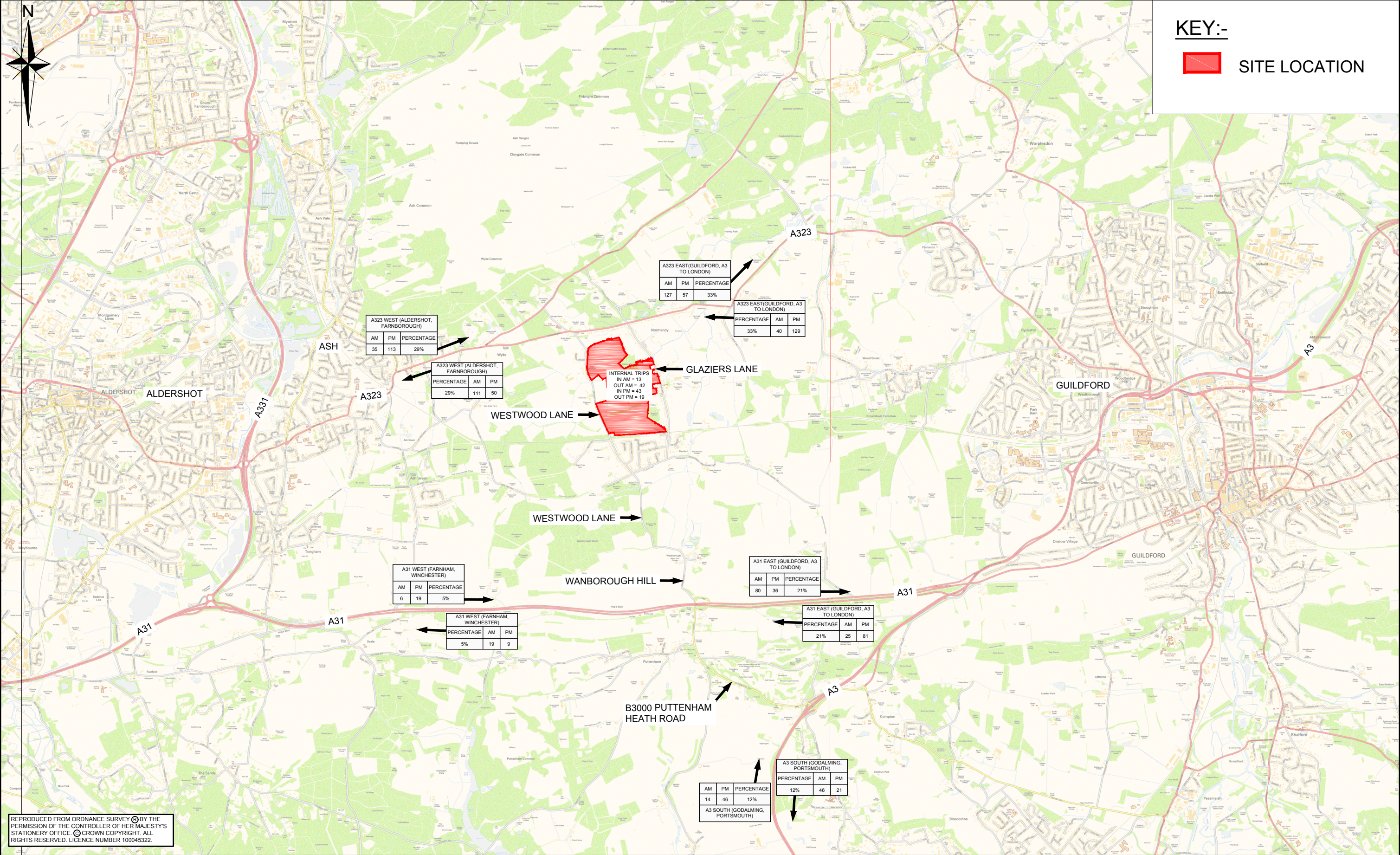
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Job Title
LAND AT NORMANDY, GUILDFORD

Drawing Title
DEVELOPMENT TRAFFIC DISTRIBUTION

Client
TAYLOR WIMPEY

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Job Title
LAND AT NORMANDY, GUILDFORD

Drawing Title
DEVELOPMENT TRAFFIC DISTRIBUTION WITH INTERNALISATION

Client
TAYLOR WIMPEY

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APPENDIX C



APPENDIX C

RESPONSE TO THE LAND ALLOCATION PROVISION IN THE GUILDFORD BOROUGH SUBMISSION LOCAL PLAN – PROVISION FOR SECONDARY EDUCATION

1 Introduction

1.1 This technical note reviews the allocation of land for new secondary school provision for Guildford Borough in the Submission Local Plan (Dec 2017) ("**Plan**") on behalf of Taylor Wimpey UK Ltd with particular emphasis on the area west of Guildford Town and East of Ash, which has a sizeable population and no local secondary school provision.

1.2 The deletion of allocation Policy A46 (Land South of Normandy) removes the previously planned remedy – a measure of new housing and a new secondary school at Normandy.

2 Summary

2.1 Approximately 7% of the Guildford Borough population live in the villages west of Guildford Town and east of Ash. This figure masks that 13% of the secondary school (11-15) age cohort live in this area. Secondary school age cohorts are rising: for Guildford by 24%; for Ash (with Farnham) by 22%; but for the area west of Guildford by 32%, in the period to 2023.

2.2 **Guildford Town is fast running out of secondary school places and will have none spare by 2022.** Guildford Town cannot look to Ash Manor (6 miles to the west) as Ash (with Farnham)¹ too is running out of places. Nor can it look to Effingham to the east because it too is under pressure from its catchment area that stretches to Horsley and Leatherhead well to the east of Guildford.

2.3 The Submission Local Plan makes land allocations for a new 'up to 6fe secondary school' at Blackwell Farm (A26), a new '4fe secondary school' at Gosden Hill Farm (A25) and the expansion of Ash Manor School by 1fe. A 4fe secondary school is identified at the Former Wisley Airfield, seven miles north east of Guildford town centre to serve it and its local area. In total, the Plan allocation identifies up to 15 forms of entry (up to 2,250 places) for pupils aged 11-15 years. The allocation of land for a secondary school of up to 8fe at Normandy (policy A46) has been deleted.

2.4 With the exception of the expansion of Ash Manor School, none of the Plan allocation is likely to be able to deliver secondary school capacity by 2022 (which is when the projections indicate a new school will be required) unless the land allocation is extracted from the host developments, the necessary infrastructure that is linked to the housing trajectory is provided independently. The Plan does not suggest this.

2.5 The Plan allocates land for 12,426 new homes in the plan period. The ONS/CLG 2016 based household projections anticipate, on a trend basis, 11,142 additional households in the Borough in the Plan period. Translating households to dwellings, the Plan appears to accommodate this, plus circa 4% vacant properties necessary for the housing market to function and circa 6% for housing growth in excess of the trend. Consequent to this increase in households, the ONS forecast indicates 2,000 additional secondary school age pupils in the Plan period (13.3fe). Adjusting this for the 6% growth over trend indicates 2,120 additional secondary school age pupils which creates demand for 14.13fe of secondary education.

2.6 On this basis, the additional up to 15fe of land allocation for secondary school provision in the Plan (see paragraph 2.3 above) would appear sufficient to meet needs arising from the planned level of housing.

¹ For reasons of school planning and parental choice of school, Ash Manor School is grouped with Farnham Secondary Schools as a single planning area.

2.7 However, and in addition to the 15fe required to meet the demand for secondary school places arising from the level of housing growth proposed in the Submission Local Plan, there is also a need to meet the demand for secondary places for the increased number of children from existing households within Guildford that will require a secondary school place.

2.8 Surrey County Council anticipate there will be an additional 1,328 secondary pupils (age 11-15) in the current period up to 2023 based on the actual numbers in the primary schools. This generates a demand for an additional 9fe.

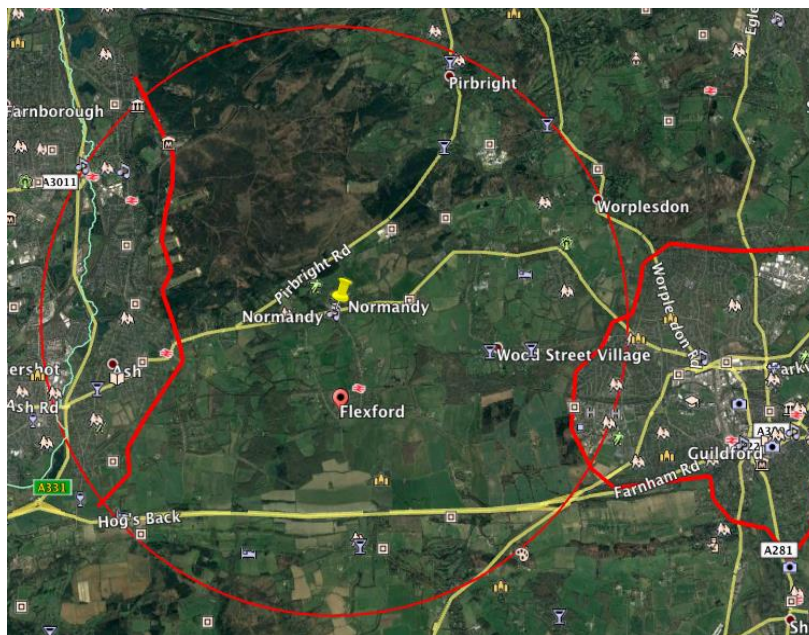
2.9. In combination, the planned level of housing in the Local Plan (requiring 15fe of secondary education) and the additional demand for secondary places from primary pupils (9fe) requires 24fe of secondary education.

2.10 The conclusions drawn are:

- Insufficient land allocated in the Draft Submission Local Plan to meet the needs for secondary school provision
- Need for additional capacity to be operational by 2022, which needs to be provided in a new school (as there is insufficient capacity to meet needs through permanent extensions to existing schools).
- Little likelihood that allocations will be able to provide secondary school capacity in the necessary timeframe (by 2022)
- The absence of secondary school capacity to serve the communities that lie west of Guildford and east of Ash does not allow parents in this area the prospect of an adequate and suitable choice of secondary school and that this undermines community cohesion.

3 The Report

3.1 Land to the west of Guildford and east of Ash, excluding the fringes of Guildford and Ash, is home to some 10,400 people across a number of villages and minor settlements². Royal Mail indicate some 4,340 homes³. Normandy is a village that lies at the very centre.



² ONS Population by Year of Age SAPE19DT10i – mid 2016

³ Royal Mail Postal Address File – July 2015 updated via ONSPD to February 2018

3.2 As at mid 2016⁴, the secondary school age group (age 11-15) in the rural western part of Guildford (which area is defined by the red circle in the above image minus the built-up areas of Ash and Guildford town and denoted by the red boundary lines) was estimated by ONS⁵ to be 546 pupils. As shown in the below table, this is projected to rise to 723 pupils by mid 2023 (+32%), which growth excludes (and does not therefore take account of) the secondary education need arising from 12,426 dwellings proposed under Policy S2 of the Local Plan,

Year (mid)	Age Group 11-15
2016	546
2017	582
2018	582
2019	608
2020	607
2021	721
2022	716
2023	723

3.3 This rise in secondary school age pupils in the area (west of Guildford) is projected to be accompanied by a parallel rise in pupil enrolment in Guildford, again net of any new housing, with this age cohort in the period to 2023 rising from 4,194 pupils to 5,184 pupils, net of new housing (+24%)⁶. For Ash, net of new housing, grouped with Farnham, the secondary age pupil numbers are projected to rise in the same period from 4,447 to 5,405 (+22%).

Year	Age Group 11-15	
	Guildford	Ash/Farnham
2016	4194	4447
2017	4371	4568
2018	4509	4857
2019	4703	5059
2020	4816	5178
2021	4967	5236
2022	5057	5329
2023	5184	5405

School Roll Projections

School	Age Group 11-15	
	Guildford Capacity	Ash/Farnham Capacity
Ash Manor		1050
Christ's College	780	
George Abbot	1500	
Guildford County	900	
Kings College	900	
St Peter's	1050	
All Hallows		1200
Farnham Heath		950
Weydon		1540
Total Capacity	5130	4740

School Capacities

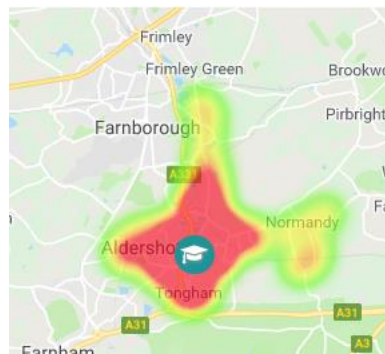
⁴ Latest published Population By Year of Age By Census Output Area SAPE19DT10i – mid 2016

⁵ Ibid

⁶ Surrey County Council School Capacity (SCAP) projection 2017 (pub. DfE Statistics).

3.4 Surrey County Council, the Guildford town schools and Ash Manor School operate an equal preference admissions system which means that when over-subscribed the prioritising criterion is the distance by a straight line from home to school.⁷ To all intents and purposes, admissions are prioritised via concentric circles centred on the front door of each secondary school.

3.5 This means, for example, Ash Manor School, when undersubscribed, has some admissions from Normandy but areas of Hampshire (a different education authority) have an admissions priority⁸. Ash/Aldershot/Farnborough forms the major urban border between Hampshire and Surrey. Whilst 480 secondary school age pupils (11-15) travel from Surrey into Hampshire each day, 1,643 travel into Surrey Secondary Schools⁹. Rushmoor Borough Council, the relevant neighbouring LPA, is delivering 5,580 new homes at Aldershot and 2,300 at Farnborough in the Plan Period to 2032 with 3,850 consented. No new secondary schools are identified and thus pressure, on Surrey schools close by, is unlikely to abate.



Ash Manor School admissions map¹⁰

Ash & Tongham Secondary								
Ash Manor School	Year 7	Year 8	Year 9	Year 10	Year 11	NOR	AN	Capacity
2016/17 AC	208	195	170	164	200	937	210	1050
2017/18 F/C	214	227	205	205	178	1029		
2018/19 F/C	233	212	226	204	204	1079		
2019/20 F/C	213	232	211	224	202	1082		
2020/21 F/C	217	211	230	209	223	1090		

School Capacity Forecast for Ash Manor School^{11 12}

3.6 Guildford Borough Council’s Proposed Submission Local Plan (2017) seeks to “make provision for at least 12,426 new homes” in the plan period 2015-2034.

⁷ Distance is measured ‘as the crow flies’ in accordance with s8 Interpretation Act 1978. (s8. In the measurement of any distance for the purposes of an Act, that distance shall, unless the contrary intention appears, be measured in a straight line on a horizontal plane.)

⁸ This is a matter of law, known as the Greenwich Judgement and codified in s86(8)(a) School standards and Framework Act 1998 as well as the National Admissions Code.

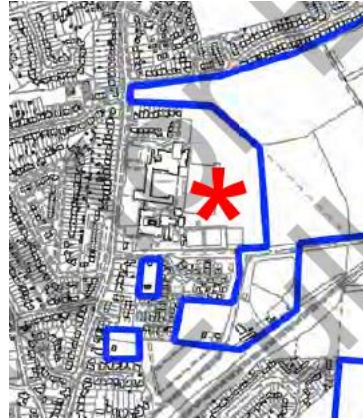
⁹ Pupil Level Annual School Census (PLASC) Cross Border Matrix January 2017

¹⁰ www.schoolsguide.co.uk – DfE national schools census January 2017

¹¹ Until 2013/14 Ash Manor School was its own School Planning Area (Ash & Tongham 93622300) . It is now in the Farnham Ash Planning Area (9363010) with three other schools.

¹² NOR = Number on Roll AN = Admission Number (the number of pupils to be admitted at secondary transfer)

3.7 Draft Plan Policy A29 provides for an additional form of entry to Ash Manor School, taking it from 1,050 places to 1,200 places but thereafter landlocks the school site. Policy A29 is for 1,700 new dwellings and circa 2.5 forms of entry based on the Surrey County Council formulaic approach to estimating the impact of new housing on school pupil numbers.¹³



Ash Manor School site * landlocked by Policy A29

3.8 Planned provision for secondary school places at the extreme west of Guildford is clearly inadequate.

3.9 For Guildford, itself, the schools, excluding George Abbot School which is full at 99.8% occupancy, are operating with a substantial surplus capacity.

	AN	Capacity	Year 7	Year 8	Year 9	Year 10	Year 11	NOR	Occupancy
Christ's College	156	780	151	152	136	101	108	648	83.1%
George Abbot	300	1500	298	300	301	299	299	1497	99.8%
Guildford County	180	900	164	162	162	160	157	805	89.4%
Kings College	180	900	57	79	84	56	65	341	37.9%
St Peter's RC	210	1050	179	180	180	179	178	896	85.3%
Total	1026	5130	849	873	863	795	807	4187	81.6%

Guildford Town Secondary schools as at January 2017 ¹⁴

3.10 By September 2023, SCC forecast that based only on existing pupil forecasts (and thus excluding the demand for secondary places arising from the level of housing planned under Policy S2 of the Local Plan) the number of pupils at the Town secondary schools will exceed the total capacity. For September 2019, it is forecast that the number of pupils at secondary transfer will exceed the total Admission Number and from September 2022 that will be a regular feature.

Guildford Town	Year 7	Year 8	Year 9	Year 10	Year 11	NOR	AN	Capacity
2016/17 AC	850	875	861	799	809	4194	1026	5130
2017/18 F/C	960	857	883	874	797	4371		
2018/19 F/C	906	968	865	897	873	4509		
2019/20 F/C	1045	912	974	878	894	4703		
2020/21 F/C	999	1047	915	983	872	4816		
2021/22 F/C	1016	1001	1050	923	977	4967		
2022/23 F/C	1061	1018	1003	1058	917	5057		
2023/24 F/C	1035	1063	1021	1012	1053	5184		

Secondary School Capacity Forecast for Guildford Town ¹⁵

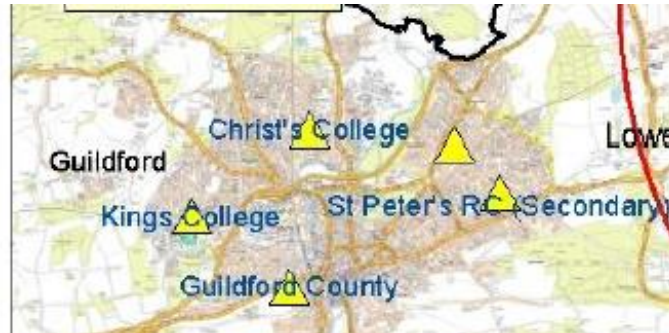
Secondary	
Housing Mix	Yield Factor
1 bed	0.01
2 bed	0.07
3 bed	0.19
4+ bed	0.36

¹³

¹⁴ AN = Admission Number NOR = Number on Roll

¹⁵ Ibid

3.11 It should be noted that, with the exception of Kings College, all of the existing secondary school provision is biased towards the east of the Town.



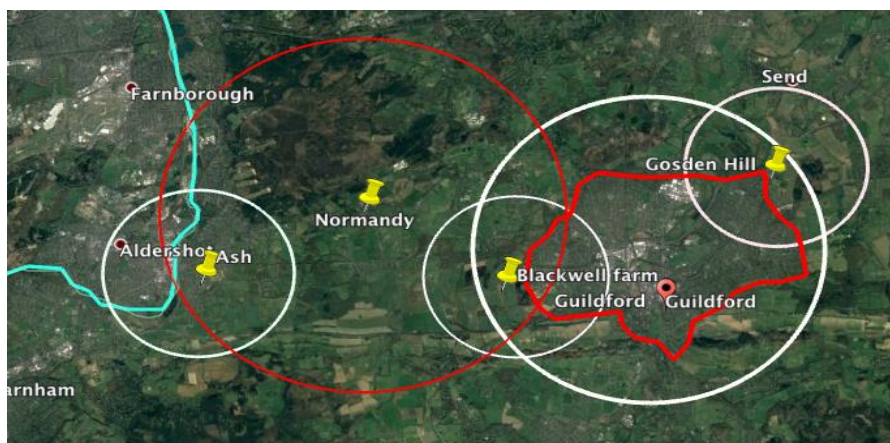
Map identifying the location of the Guildford Town Secondary Schools

4 School Catchment Areas

4.1 When schools have spare capacity, broadly, they must admit all applications. When school admissions are under pressure, then after priority admissions criteria, for example: special needs; in care of local authority, perhaps faith, perhaps siblings already on roll, the admissions priority is distance, in Surrey via a straight line measurement.

4.2 Outlying admission distances vary year on year both because of the pendulum of popularity and the actual number of resident 10 year olds at any specific address.

4.3 The core catchments, though, are a reasonably constant equidistant, of course varied in the more rural parts by areas with virtually no housing. The map below transfers the core admissions areas from the school specific heat maps above on to a single map to which the notional catchments of the proposed new provision in the Submission Local Plan have been added.



4.4 It seems clear that the area between the west of Guildford Town and Ash will remain a school admissions stress area.

4.5 From a purely school provision perspective, Normandy is the best location for a new secondary school. There are three reasons:

- It serves the hitherto poorly served communities;
- It relieves pressure on the Ash area without capacity being consumed from towns to the west
- It relieves pressure on Guildford town itself.

4.6 I understand that a secondary school at Normandy can be delivered quickly.

5 Conclusions

- 1 The planned level of housing in the Local Plan (requiring 15fe of secondary school places) and the additional demand for secondary school places indicated by the numbers of pupils in the primary schools (9fe) requires 24fe of additional capacity overall during the plan period (2015-2034).
- 2 There is a need for an additional secondary school to be operational by 2022.
- 3 There is inadequate provision to meet the need for secondary school places in the western part of the Borough

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