



GL Hearn

Part of Capita Real Estate

Guildford Borough Local Plan – Matters Statement

First Regional Estates Limited

Matters 11.1 and 11.2

9 May 2018

Prepared by

GL Hearn

75 Wells Street
London W1T 3QH

T +44 (0)20 7580 5886
glhearn.com

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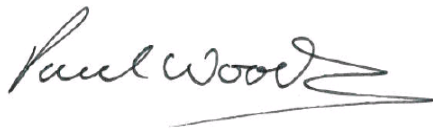
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DATE
9 May 2018

ORIGINATORS
Paul Woods
Director

APPROVED
David Cassells
Director





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1 INTRODUCTION

- 1.1 This Hearing Statement seeks to expand on our representations to the Guildford Borough Proposed Submission and Submission Local Plans in respect of site allocation A5 on behalf of First Regional Estates Limited in response to matters 11.1 and 11.2 identified by the Inspector. The identified matters relate to 4 no. site allocations, namely A5 (Jewsons), A6 (North Street Redevelopment), A7 (Guildford Station) and A9 (Walnut Tree Close). Each matter is considered respectively in sections 2 and 3.

2 **MATTER 11.1**

2.1 Matter 11.1 asks:

“Could the plan be more ambitious in the number of dwellings it might achieve on these sites?” and
“Should site A8 be residential?”

2.2 We set out our comments in relation to the first question below with particular focus on site allocation A5.

2.3 We consider generally that the plan could be more ambitious in the number of dwellings it might achieve on these sites having regard to their town centre location, proximity to the railway station and also national planning policy guidance.

2.4 Paragraph 17 of the National Planning Policy Framework (NPPF) (March 2012) sets out 12 core principles which should underpin both plan-making and decision-taking. These include encouraging the effective use of land by reusing land that has previously been developed; promoting mixed use developments; and actively managing patterns of growth to make the fullest possible use of public transport, walking cycling and focusing significant development in locations which are or can be made sustainable.

2.5 The Government is currently consulting on proposed changes to the NPPF with the consultation period running from 5 March to 10 May 2018. Section 11 of the consultation draft NPPF is titled making effective use of land. Paragraph 117 confirms that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, whilst safeguarding and improving the environment. Under the sub heading achieving appropriate densities, paragraph 122 indicates that planning policies and decisions should support development that makes efficient use of land taking into account, inter alia, the identified need for housing and other forms of development, and the availability of land suitable for accommodating it.

2.6 With respect to A5 (Jewsons Site), our original representations submitted in July 2016 to the Guildford Borough Proposed Submission Local Plan (2016) (GBC-LPSS-CD-002a) set out the case for increased density on the site, which at the time allocated provision of approximately 125 residential units based on a site area of 0.64 hectares, thereby equating to a residential density of 195 dwellings per hectare (dph).

2.7 We made reference to the density of development achieved as part of the residential led mixed use scheme immediately south of the Jewsons site at 1 & 2 Station View, which has now been completed under outline planning permission ref: 06/P/02309 and reserved matters approval ref:

09/P/01965 with subsequent minor alterations under variation of conditions permission ref: 14/P/01614. This development provides for 177 dwellings on a site area of 0.5 hectares equating to a residential density of 354 dph. Furthermore, the scheme provides for 1,837 sqm of B1 office floor space in addition to the residential floor space.

- 2.8 We noted the Council's planning committee report in relation to the outline permission ref: 06/P/02309 which, in consideration of density, indicated that the site was highly sustainable and therefore it was appropriate to seek a high density. We further noted that the Jewsons site and the site at 1 & 2 Station View sit within a similar urban context and that if one were to apply the same density to the allocation under A5 based on a site area of 0.64 hectares the potential redevelopment of the site could give rise to 226 residential units with potential for some additional commercial space as part of a mixed-use scheme.
- 2.9 As part of changes incorporated into the Council's Submission Local Plan (2017) (GBC-LPSS-CD-00a), the boundary of the A5 site allocation was amended in response to our representation that the site should incorporate the strip of land to the west and north within our client's ownership, which could then facilitate pedestrian and cyclist access through site serving the proposed Sustainable Movement Corridor under site allocation A10. The Council also sought to increase the identified residential capacity and density of development of the site to 175 dwellings, which based on an enlarged site area of 0.74 hectares equates to a residential density of 236 dph.
- 2.10 Notwithstanding these changes to Policy A5, we remain of the view that the Council is under estimating the capacity of the site. As set out in our original representations, we consider that the site has the potential for a residential density of 354 dph, which, based on a site area of 0.74 hectares, would give rise to a capacity of 262 dwellings. Having regard to the surrounding context for the site, we consider that there is the opportunity to introduce development of height and scale along the western and northern boundaries of the site with an appropriate reduction in height along the eastern boundary to respect the residential amenity of properties in Walnut Tree Close.
- 2.11 The potential for higher density development in this part of the town centre is reflected in the recent appeal decision dated 22 January 2018 allowing for comprehensive mixed-use development in respect of the Guildford Railway Station site - site allocation A7 (Guildford Station) (Planning Application ref: 14/P/02168, Appeal ref: APP/Y3615/W/16/316412). We attach a copy of the appeal decision as background reference at **Appendix A**.
- 2.12 The site allocation for A7 within the Guildford Borough Submission Local Plan (2017) indicates that the site is allocated for a comprehensive mixed-use redevelopment to include: (1) approximately 350 homes (C3); (2) approximately 500 sqm of additional comparison retail (A1); (3) approximately

700 sqm of additional convenience retail (A1); approximately 1,500 sqm food and drink (A3); and provision of 1 gym (D2).

- 2.13 The application provides for 438 residential dwellings (Class C3 uses); station retail/financial and professional services/food and drink and leisure floorspace (Class A1/A2/A3/Sui Generis and D2 uses); station and general office floorspace (Sui Generis and Class B1 uses), station improvements including new station building with booking hall and concourse (Sui Generis use); and replacement station and office car parking, new residential car parking, cycle parking, a Station Plaza including new public realm and with hard and soft landscaping, new access and servicing arrangements, plant and associated works. The proposed floorspace for the scheme was summarised in the Planning Committee report as station office (1,877 sqm); station ticket hall (746 sqm); existing commercial units A1/A3/Sui Generis (749 sqm GIA); and proposed commercial units A1/A3/A2/Sui Generis (3,427 sqm GIA).
- 2.14 The application was refused by the Council principally for reasons related to effect on designated heritage assets including a Grade II* listed building, a Grade II registered landscape, the Bridge Street, Wey & Godalming and Millhead and Portsmouth Road Conservation Areas and undesignated heritage assets within them; and effect on the character and appearance of the surrounding townscape and wider area. This was by virtue of the proposed development's monolithic scale, unbroken length, largely uniform height and unrelieved mass. In allowing the appeal, the Inspector concluded that the scheme would avoid harm to heritage assets and townscape quality and that the proposal would offer tangible benefits to the built environment around Guildford Station, as well as significant social and economic benefits. He noted that the scheme was a form of sustainable development that the NPPF supports. In this instance, it is evident that the approved scheme provides for a larger scale and capacity of development than that provided for in the Submission Local Plan.

3 **MATTER 11.2**

3.1 Matter 11.2 asks:

“Should the plan allow for student accommodation on any of the above sites, given the proximity to the University?”

3.2 We respond to this matter below with particular reference to site allocation A5.

3.3 National Planning Practice Guidance relating to housing and economic development needs assessments (20 March 2015) provides guidance on how the needs of all types of housing should be addressed. With respect to Student Housing, it notes that Local Planning Authorities should plan for sufficient student accommodation whether it consists of communal halls of residence or self contained dwellings and whether or not on campus. The guidance describes how encouraging more dedicated student accommodation may provide low cost housing that takes the pressure off the private rented sector and increases the overall housing stock. It also encourages plan makers to consider options which would support both the needs of the student population as well as local residents before imposing caps or restrictions living outside of university provided accommodation.

3.4 Policy H1: Homes for All of the Guildford Borough Submission Local Plan indicates that new residential development is required to deliver a wide choice of homes to meet a range of accommodation needs as set out in the latest Strategic Housing Market Assessment (SHMA). With respect to student accommodation, point (5) of the policy notes that purpose built student accommodation for full time higher education Guildford based students will be encouraged on campus locations where appropriate and that ‘about 60 per cent’ of full time Guildford based University of Surrey students are expected to be provided with accommodation on campus. Supporting paragraph 4.2.7 indicates that purpose built student accommodation on campus will be considered separately from general housing needs in the plan and that any additional student accommodation built over and above projected need will count towards the general housing requirement based on the amount of accommodation it releases into the general housing market.

3.5 Paragraph 4.2.18 of the Submission Local Plan states that to minimise the pressure on the existing housing stock it is important that new accommodation is provided to meet any significant increase in full-time Guildford based students. It is noted that windfall sites is sustainable locations close to higher education establishments maybe suitable for purpose built student accommodation but that the Council will resist such development on sites allocated for housing. The paragraph describes how the University of Surrey is projecting a significant growth in student numbers over the plan period as set out in the Council’s SHMA and is therefore expected to accommodate a proportion on

campus, whereas the Council's housing target includes provision for future Guildford based students opting to live in market housing.

- 3.6 Background on the Council's strategy for meeting the needs of student accommodation is set out at paragraphs 4.31 to 4.42 of the Council's Topic Paper: Housing Type, Tenure and Mix (GBC-LPSS-SD-TP-008). Paragraph 4.34 refers to the West Surrey SHMA Guildford addendum 2017 (GBC-LPSS-SD-003), which in turn looks at the student population in Guildford and how it might influence the need for both student accommodation and a wider housing. It is noted that the scale of growth in additional full time Guildford-based students is expected to be 3,800 over the plan period to 2034.
- 3.7 Paragraph 4.35 of the Topic Paper confirms that the SHMA addendum estimates that 55% of University of Surrey full-time Guildford based students will live in halls on campus. On this basis, it is noted that there would be an additional maximum need for up to 428 C3 dwellings (23 dwellings per year) for 1,710 students living within the general housing stock over the plan period to 2034 based on the assumption that there are 4 students per household. The Topic Paper describes how this separately identified student housing need for C3 dwellings is included within the general housing need figures.
- 3.8 We note from Paragraph 7.14 of the Council's response to the Inspector's Initial Questions 1-8 that the University of Surrey have stated that the demand for campus accommodation is between 50-55% of Full Time Equivalent (FTE) students and that providing accommodation over the 50 to 60% rate will see on campus accommodation suffering increased vacancy rates and that the University therefore strongly objected to the requirement that 60% of FTE students be accommodated on campus. The Council has indicated at paragraph 7.15 that retaining an expectation of about 60% of students being provided with accommodation on campus, whilst ambitious, is reasonable, justified and robust.
- 3.9 It is evident from the above that significant growth in students numbers is projected over the plan period and that there is a recognised need to provide additional housing for Guildford based students not living on campus. The Council recognises at paragraph 7.20 of its response to the Inspector's Initial Questions 1-8 that students have a variety of different needs and have a free choice where they live and just because accommodation is available on campus does not mean it will be fully occupied and that students cannot be compelled to live on campus. The Council recognises that students seek different accommodation based on a number of factors.
- 3.10 The Council has assumed that 55% of the growth in University of Surrey Guildford-based students numbers will be provided on campus over the plan period and that 45% will be expected to live in the wider housing market and this has been included in the general housing figures. The Council has allocated some land for student housing as noted at paragraph 4.38 of its Topic Paper: Housing

Type, Tenure and Mix. These are at site allocations A16 (mix of housing and some student accommodation – bedspace numbers not specified), A18 (200 bedspaces) and A33 (112 bedspaces). Otherwise, Paragraph 4.2.18 of the Submission Local Plan indicates that windfall sites in sustainable locations close to higher education establishments maybe suitable for purpose built student accommodation.

- 3.11 Whilst we recognise that the University of Surrey Guildford-based student numbers have been included within the housing projections over the plan period, we consider that there is merit in allowing flexibility of use for student accommodation as well as residential development in the allocation of appropriate sites in sustainable locations close to the University. The Council recognises in its Submission Local Plan that windfall sites in sustainable locations close to higher education establishments may be suitable for such purpose built accommodation. Rather than relying on windfall sites to come forward in this way, providing flexibility of use on appropriately located sites will help provide certainty in the market for the development of student accommodation in these locations, which in turn will help release pressure on the wider housing market, in particular the private rented sector as recognised in Planning Practice Guidance. The fact that there is demand for student accommodation in this area is evidenced by the recent development of purpose built student accommodation as part of the ‘Scape’ development at Walnut Tree Close – www.scape/.com/en-uk/student-accommodation/surrey.
- 3.12 Of the sites identified by the Inspector under matter 11.2, we consider that A5 (Jewsons site) best lends itself to providing for such flexibility. It is the closest of the sites to the University of Surrey Stag Hill Campus and represents an idea location for student accommodation. It is situated in a highly sustainable location within short walking distance of the town centre and Guildford railway station, but is also a short walk from the Stag Hill Campus on the other side of the railway line accessed via Yorkie’s Bridge. Given its sustainable location and relationship to the railway line and existing development to the south, the site would lend itself to a high-density development which could make an important contribution to the needs of student accommodation over the plan period.
- 3.13 As set out in our representations to the Submission Local Plan, we are not proposing a single use student housing allocation, rather a flexible allocation that allows for either residential use or student housing or indeed a mix of the two, subject to market demand for development in this location and we would refer to our proposed change of wording in our original representations.

APPENDIX A: Guildford Station Appeal Decision