

Planning Inspectorate
c/o Chris Banks
Programme Officer for Guildford EiP
64 Lavinia Way
East Preston
West Sussex
BN16 1EF

Date: 10 May 2018

Our ref: 12919/SB/DP/15873987v1

Your ref: Matter 11 – Site Allocation A7

Written Hearing Statement Matter 11 (Site Allocation A7 Guildford Station) for Solum in relation to Guildford Borough Local Plan: Strategy and Sites Examination

We set out below a Written Hearing Statement on behalf of Solum on Matter 11 insofar as it relates to Site Allocation A7 – Guildford Station.

We do so further to our written representations submitted on behalf of Solum on the Proposed Submission Local Plan, June 2016 (Regulation 18) and on the Proposed Submission Guildford Local Plan: Strategy and Sites, July 2017 (Regulation 19). We attach these earlier representations at Annexe 1 for ease of reference.

As can be seen both sets of these earlier representations proposed amendments to Site Allocation A7 to request that this policy be aligned with the Solum proposals for the Guildford Station site. This Hearing Statement sets out the amendments now proposed by Solum to Site Allocation A7 and in doing so responds to the aforementioned matter raised by the Inspector.

Background

Established in July 2008, Solum is a partnership between Network Rail and Kier Property, formed to attract private investment into the rail network. Solum Regeneration (Guildford) LLP (SRG) has been formed specifically to deliver the Guildford Station project which is the subject of Site Allocation A7.

The Guildford Station proposals were originally the subject of a full planning application (ref: 14/P/02168) submitted in November 2014 which was refused planning permission at the Guildford BC (GBC) Planning Committee on 29th June 2016, principally on heritage and design grounds. SRG subsequently lodged an appeal against this refusal in October 2016 and following a public inquiry in November 2017 this appeal was allowed on 27th February 2018 (ref: APP/Y3615/W/16/3161412).

A copy of this appeal decision is attached at Annexe 2 to this Statement.

The development, which was the subject of the above appeal, is for a mixed use redevelopment comprising 438 residential dwellings (Class C3 use); 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); replacement station and office car parking, new residential car parking, cycle

parking, a Station Plaza including new public realm with hard and soft landscaping, new access and servicing arrangements, plant and associated works.

It is SRG's intention to implement the above proposals on the Guildford Station site. Discussions with GBC planning officers have taken place as part of progressing the discharge of the relevant pre-commencement planning conditions to allow the first phases to proceed. It is anticipated that enabling works will commence in 2019.

Against the above background SRG wishes to ensure that Site Allocation A7 is aligned with the scheme now being implemented and believes that without the changes identified below being incorporated this policy remains unsound.

Statement on behalf of SRG

It is noted that para 11.1 of the Inspector's Matters and Issues for Examination deals with Site Allocations A5, A6, A7 and A9 and states that:

"Could the plan be more ambitious in the number of dwellings it might achieve on these sites?"

Whilst SRG is content to rely upon earlier submitted representations in relation to the non-site specific policies they wish to take the opportunity to comment on Site Allocation A7 and address the above matter.

The current version of Site Allocation A7 does not reflect the SRG scheme. Specifically, in relation to the matter raised by the Inspector it should be recognised that the SRG approved scheme includes 438 dwellings rather than 350 dwellings suggested in the draft site allocation.

Solum considers therefore that a greater number of dwellings can be accommodated on this site than currently envisaged by draft Site Allocation A7.

Having regard to relevant policy it is noted that NPPF at para 14 provides encouragement for sustainable development and at para 17 also encourages (1) the effective use of land reusing land that has been previously developed (brownfield land) and (2) actively managing patterns of growth to make fullest possible use of public transport, walking, and cycling and focussing development in locations which are or can be made sustainable.

GBC's own policy objective contained in Policy S2 as reflected at para 4.1.6 is also to focus growth in the most sustainable locations and to make the best use of previously developed land including within the Guildford town centre.

At present the policy as drafted is therefore:

- 1 not **positively prepared** as it fails to fully recognise the development potential of this sustainable and previously-developed site;
- 2 not **justified** as underproviding residential numbers on this site would not be the most appropriate strategy as it is likely to require more greenfield and green belt land to be used to allow the OAN to be met; and
- 3 is not **consistent with national policy** as summarised above.

SRG considers that to address the above and to ensure that this policy is 'sound' Site Allocation A7 should be amended so that the policy allocation reads as follows (additional wording in italics):

"The site is allocated for a comprehensive mixed-use redevelopment to include:

- (1) ~~Approximately 350 homes (C3)~~ *438 homes (C3)*, and

~~(2) Approximately 500 sq m of additional comparison retail (A1) Additional retail (convenience and comparison) and food and drink offer, and~~

~~(3) Approximately 700 sq m of additional convenience retail (A1), and~~

~~(4 3) Approximately 1,500 sq m food and drink (A3) Additional complementary offices and assembly & leisure uses, and~~

~~(5 4) Provision of 1 gym (D2) Improved transport and interchange facilities.”~~

Reference to improved transport and interchange facilities should be included in the allocation as this reflects their importance as part of the overall SRG scheme.

Given that the consented scheme also allows flexibility between Class A1/A2/A3 and D2 uses it is inappropriate in our view for this policy to define the level of floorspace by use class.

On a general note, and consistent with the above, we believe that the Site Allocations should encourage similar densities on other brownfield sites within Guildford town centre that make best use of this finite land – this should include land west of Guildford railway station, Guildford Park Road, Guildford which draft Site Allocation A8 suggests provides an opportunity to provide housing.

We would be grateful if you could acknowledge receipt of this Hearing Statement. If any matters require clarification please contact either me or Steven Butterworth.

Please note that SRG is happy to rely upon this Statement and earlier representations and does not propose to appear, or be represented, in person at the Examination.

Yours sincerely



Dennis Pope
Planning Director



ANNEXE 1: Written representations submitted on behalf of Solum on the Proposed Submission Local Plan, June 2016 (Regulation 18) and on the Proposed Submission Guildford Local Plan: Strategy and Sites, July 2017 (Regulation 19).

Planning Policy (Local Plan Consultation)
Guildford Borough Council
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By email: localplan@guildford.gov.uk

Date: 21st July 2017

Our ref: 12919/SB/DP/14077541v2

Your ref:

Dear Sir/Madam

Regulation 19 Consultation on Proposed Submission Guildford Local Plan: Strategy and Sites, June 2017

Representation by Solum Regeneration (Guildford) LLP

Nathaniel Lichfield & Partners (NLP) has been instructed by Solum Regeneration (Guildford) LLP (SRG) to review the Proposed Submission Guildford Local Plan: Strategy and Sites, July 2017 as part of the above consultation and submit representations on their behalf.

As this is a Regulation 19 consultation our representations have focussed on the changes that have been introduced to the draft Local Plan 2016 version. However, we would note that the legal tests remain the same. Hence the PSLP must be "sound" i.e. it should be positively prepared, justified, effective and consistent with national policy.

For ease of reference, we attach SRG's representations on the draft 2016 Local Plan (at Annexe 1 to this letter). Our comments below should be read in conjunction with the 2016 SRG representations.

Solum Regeneration in Guildford - Update

Since the first round of PSLP consultation in July 2016 and the refusal of the Solum planning application by GBC on 29th June 2016, on heritage and design grounds, SRG has appealed this decision and a public inquiry is scheduled from 7th to 15th November 2017.

SRG remains an important stakeholder in the town centre intent on delivering improvements to Guildford Railway Station (a 'gateway' to the town and a key component of its infrastructure) through the delivery of much needed new housing at this highly sustainable brownfield location.

Scope of Regulation 19 Representations

We make comments on the following parts of the draft Local Plan where changes have been introduced in the Regulation 19 version of the PSLP:

- 1 Spatial Vision (pages 21-23);

- 2 Policy S2: Borough Wide Strategy (pages 30-31), including the West Surrey SHMA: Guildford Addendum Report, 2017 and other updated evidence base documents;
- 3 Policy H1: Homes for All (pages 35 – 42);
- 4 Policy A7: Land and Buildings at Guildford Railway Station (pages 159 –161); and
- 5 Policy H2: Affordable Homes (pages 44-47).

Spatial Vision

In defining a Spatial Vision for Guildford, in particular how best to meet housing need, regard should be given to the February 2017 Housing White Paper. The advice given to local authorities in the White Paper states that:

“...the Government asks local authorities to be as ambitious and innovative as possible to get homes built in their area. All local authorities should develop an up-to-date plan with their communities that meets their housing requirement (or, if that is not possible, to work with neighbouring authorities to ensure it is met), decide applications for development promptly and ensure the homes they have planned for are built out on time. It is crucial that local authorities hold up their end of the bargain. Where they are not making sufficient progress on producing or reviewing their plans, the Government will intervene. And where the number of homes being built is below expectations, the new housing delivery test will ensure that action is taken.” (Executive Summary) (our emphasis)

It is evident therefore that local authorities should be “ambitious” in making a contribution to the need to increase housing delivery. However, the White Paper also recognises that local authorities should maintain “existing strong protections for the Green Belt, and clarifying that Green Belt boundaries should be amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements” but at the same time “making more land available for homes in the right places, by maximising the contribution from brownfield and surplus public land.” (Step 1: List of Proposals)

Although the draft Spatial Vision confirms that the preferred location for new residential is on existing brownfield sites we note that only 3,000 dwellings (previously 2,800 dwellings in the 2016 PSLP) of the total 12,426 dwellings (previously 13,860 dwellings in the 2016 PSLP) required over the plan period up to 2034 are in the urban areas. This means that despite this stated objective 76% of the new residential is allocated outside of the urban areas. The significant majority of proposed housing in Guildford will therefore not be able to take advantage of the existing infrastructure and services that are provided in urban area or help to reduce the need to travel and offer alternative modes of transport to the private car.

This remains inconsistent with the emphasis placed on encouraging the effective use of brownfield land contained in the NPPF (paras 17 and 111) and the encouragement given “to ‘boost significantly’ the delivery of housing (para 47).

We consider that significantly greater emphasis needs to be incorporated in the Vision to reflect the Government’s national policy imperative contained in the Housing White Paper as identified above.

Whilst recognising the challenge of accommodating significant levels of housing within Guildford we would suggest that, as a matter of principle, the Vision should strongly encourage opportunities to maximise residential development within the Town Centre. This will help to ensure that the need to take ‘greenfield’ or Green Belt land is minimised.

We would suggest that this approach would more accurately and appropriately reflect Government green belt policy, which at paragraph 84 of the NPPF indicates that:

“When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.”

We consider that the Vision should be more strongly expressed to espouse this principle, rather than simply suggesting that existing brownfield sites are the “preferred location”. We would therefore suggest, to ensure consistency with national policy and plan soundness, that the following text (underlined) should be added to the third paragraph of the Spatial Vision as follows:

“The plan provides for the delivery of 12,426 additional homes by 2034. As the preferred location for this development is on existing brownfield sites in the urban areas, in particular highly accessible locations within Guildford town centre, opportunities to maximise residential development and make best use of land in these locations must be taken. Over 3,000 units are proposed in the urban areas which take advantage of the existing infrastructure and services, reduce the need to travel and offer alternative modes of transport to the private car.....”

In addition given the importance of the Guildford Railway Station within the town centre in terms of being a strategic development site which will improve station facilities, provide a new urban quarter and deliver a significant level of housing we would suggest that specific reference should be made to this site within the Spatial Vision text.

An additional sentence should be added to the text of the Spatial Vision after the paragraph that also deals with the North Street site to read:

“The redevelopment of the Guildford Railway Station site will deliver significant station improvements and assist in increasing station capacity, whilst making a major contribution to meeting housing need on a brownfield site in a highly sustainable location within the town centre.”

Policy S2: Borough Wide Strategy

Policy S2 sets out the proposed annual housing target. It is proposed that this is reduced from 13,860 dwellings over a plan period 2013-2033 (693 dwellings per annum) to 12,426 dwellings over a plan period 2015-2034 (654 dwellings per annum). This is substantively based on new evidence the GBC has brought forward in respect of the Borough’s objectively assessed need (OAN) for housing.

However, it is considered the proposed plan housing requirement in Policy S2 is not ‘sound’ as it is not positively prepared (being based on a strategy which seeks to meet actual objectively assessed housing needs) and not justified (being based on evidence which is not robust).

We have reviewed the two main documents which form the evidence base for the Council’s housing requirement in the Plan; the West Surrey Strategic Housing Market Assessment (SHMA) (2015) and the Guildford Addendum (2017). Our review of these documents (appended at Annexe 2 to these representations) demonstrates that:

- 1 By selectively updating the evidence base for Guildford when it forms part of a wider housing market area (HMA), the assessment raises inevitable issues of consistency within different parts of the HMA, as it draws upon different demographic and economic assumptions in assessing housing need. In this context, it is important to note that no evidence is put forward in the Guildford Addendum to demonstrate that its new, lower OAN figure will not have an impact on the rest of the HMA; and

- 2 The SHMA and its Addendum do not reflect the guidance set out in the PPG, particularly with regard to market signals and the likelihood of any uplift improving affordability. The Waverley Local Plan Inspector has recently established that uplift for headship rates (as put forward in the SHMA and addendum) is insufficient, and our analysis shows that an uplift which brings the OAN to a level of circa 700-750 dwellings per annum is both realistic (in terms of growth rates achieved in comparable areas) and could be expected to improve affordability. It would also help to increase the supply of affordable housing. Once the need for student accommodation is factored in, the full OAN would amount to c.725-775 dpa.

For the above reasons, we consider that draft policy S2 is unsound because the OAN figure used (and subsequent housing requirement in the PSLP, which seeks to meet the OAN) is not in fact the full OAN - is too low. In order to make the plan sound, an increase in the OAN/housing requirement is needed (to c.725-775 dwellings per annum) to ensure that OAN and plan housing requirement reflect the PPG and para 14 of the NPPF.

Furthermore, with respect to Policy S2, we have also reviewed the Land Availability Assessment (LAA) Addendum which has been published alongside the PSLP. The LAA Addendum contains the Council's current position on its five-year housing land supply and concludes it can only demonstrate 2.36 years supply. The shortfall is to be addressed through the allocation of additional green belt sites through the adoption of the Local Plan. The LAA Addendum Housing Trajectory identifies that 1,395 units are anticipated from Green Belt sites within the first five years of the plan period, representing 39% of the potential housing provision identified for this time period. Therefore, at present there is an over-reliance on currently unallocated green belt sites within the first five years of the plan. This could be partly addressed by the earlier delivery of urban sites which are currently allocated to later phases of the plan.

In the context of the revised OAN/housing need requirements identified, we calculate that the Council's five year supply is actually in the region of 1.94 to 2.09 years.

In addition the 'deliverability' of a number of the sites identified which do not have planning permission is queried in the context of the NPPF requirement for sites to be "*achievable with a reasonable prospect of housing being delivered within five years*" (Footnote 11). This is especially relevant within Guildford Borough Council, where there is a very poor track record of approving major residential development schemes¹.

Excluding sites without planning permission the five-year housing land supply is argued to be a low as 1.47 years (based on our OAN of 775).

On the above basis, we consider that there is a 'serious and significant' shortfall in the Council's five year housing land supply. This should be explicitly addressed in Policy S2, which currently does not refer to expected housing supply with the first five years of the plan period.

Accordingly, and alongside our concerns regarding the OAN/housing requirements, we consider that Policy S2 is unsound.

¹ Department of Communities and Local Government figures show that 47% of major residential applications were approved by GBC, compared to the average in England of 81%, in the year ending March 2017.

Policy A7: Land and Buildings at Guildford Railway Station

No substantive changes are proposed to this site allocation other than the deletion of the reference to avoiding development in Flood Zone 2 - this change reflects a factual error and confirms that no part of the A7 site lies with this zone.

However, we note that our other comments on the 2016 PSLP (attached at Annexe 1) have not been taken on board and we remain of the view that these amendments to Policy A7 are necessary to render the policy sound.

Thus, we consider therefore that Policy A7 should be amended to more closely align with the residential capacity potential of this site (i.e. 450 dwellings, rather than 350) and to reflect the ability for the whole of that housing to be delivered in the 'first five years' of the plan (i.e. 2019/20 to 2023/24, rather than the 6-10 years phase).

We also consider that the 'Allocation bullets' be amended to read:

- Improved transport and interchange facilities,
- Approximately 450 homes (C3),
- Additional retail (convenience and comparison) and food and drink offer, and
- Additional complementary offices and assemble & leisure uses.

Finally, we consider that the soundness of Policy A7 also requires the 'Opportunities' section to explain that the improvement of the station infrastructure at Guildford Station, consistent with the Infrastructure Schedule contained at PSLP Appendix C which specifically includes "Guildford rail station capacity and interchange improvements...[to be] Network Rail and developer funded". Those improvements proposed and funded by SRG, if approved, will be delivered in the first five years, so the time period should be amended to "between 2019 and post 2034" Where such transport and interchange improvements are to be funded through commercial redevelopment, the viability of such development will be affected as a consequence.

Policy H1: Homes for All

Previously this policy in the 2016 PSLP stated:

"New residential development is required to make the most efficient use of land whilst responding to local character, context and distinctiveness. Residential densities will vary dependent upon the local area context and character and the sustainability of the location. Higher density development will be supported in Guildford town centre."

Policy H1 in the 2017 PSLP has, however, removed the above text.

As a consequence, the preamble which previously made reference to the need to use natural resources, such as land wisely, and which recognised that the efficient use of land is "essential", has also been removed.

It is unclear what the justification is for removing this policy guidance given that making effective use of land, particularly that which is previously-developed, is entirely consistent with the NPPF (paragraph 17). Similarly, the removal of this policy guidance is at odds with the priority (stated in the Spatial Vision) to direct new residential to existing brownfield sites by making best use of previously-developed land in order to avoid the use of greenfield sites.

If GBC is serious about these objectives, this policy guidance should be re-instated.

Policy H2: Affordable Homes

The 2017 PSLP Policy H2 remains inconsistent with the NPPF and is unsound because the policy itself does not expressly deal with development viability and deliverability, notwithstanding this is addressed within the reasoned justification to the policy (at paras 4.2.34 to 4.2.44).

The latter (4.2.40) recognises that there may be some circumstances where abnormal costs would make scheme delivery unviable and that, where developers demonstrate to the Council's satisfaction that providing the amount of affordable housing required by this policy would not be economically viable, they will accept a reduction in the overall number of affordable homes.

The draft policy continues to rely upon the 2011 Planning Obligations SPD which indicates that, where it is not viable for a development to meet all the requirements of this SPD (i.e. including affordable housing), a flexible approach will be taken by the Council. We consider the approach to be taken where proposed developments – for whatever reason – are found to be unable to support affordable housing at the prescribed 40% level, should be addressed in the policy itself, given the deliverability requirement of the NPPF.

Please contact me, or Steven Butterworth, to discuss our client's representation.

Yours faithfully



Dennis Pope
Planning Director



**ANNEXE 1: Solum Representations in relation to Guildford Local Plan: Strategy and Sites,
July 2016**

Planning Policy (Local Plan Consultation)
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Date: 18th July 2016
Ref: CL/12919/01/SB/DP
By email: localplan@guildford.gov.uk

Dear Sir or Madam

Guildford Borough Council: Guildford Borough Proposed Submission Local Plan: Strategy and Sites

Representation by Solum Regeneration (Guildford) LLP

Nathaniel Lichfield & Partners (NLP) has been instructed by Solum Regeneration (Guildford) LLP (SRG) to review the above consultation and submit representations on SRG's behalf.

Solum Regeneration in Guildford

Established in July 2008, Solum Regeneration (SR) is a partnership between Network Rail and Kier Property, formed to attract private investment into the rail network. SRG has been formed specifically by SR to deliver the Guildford Station project.

NLP submitted a planning application (Ref: 14/P/02168) on behalf of SRG for the comprehensive mixed use redevelopment of Guildford Station, including significant station improvements, public realm and new homes, in November 2014. Following subsequent extensive consultation and engagement with Guildford Borough Council (GBC), statutory bodies and local groups, revised scheme proposals were submitted to GBC in November 2015.

The SRG planning application was refused planning permission at the GBC Planning Committee on 29th June 2016, principally on heritage and design grounds. SRG is currently considering options for progressing development at the Guildford Station site. SRG remains an important stakeholder in the town centre intent on delivering improvements to Guildford Railway Station (a 'gateway' to the town and a key component of its infrastructure) through the delivery of much needed new housing at this highly sustainable brownfield location.

Representations were previously submitted on behalf of SR in relation to the Guildford Borough Local Plan Strategy and Sites: Issues and Options (2013) and the Draft Guildford Local Plan: Strategy and Sites (July 2014). Further representations are now submitted on the site allocation and other policies and allocations in the Proposed Submission Local Plan, June 2016.



Scope of Representations

We make comments on the following parts of the draft Local Plan:

- 1 Spatial Vision (pages 19 – 21);
- 2 Policy S2: Borough Wide Strategy (pages 26 – 27);
- 3 Policy H1: Homes for All (pages 31 – 32);
- 4 Policy H2: Affordable Homes (pages 38 -39);
- 5 Policy E7: Guildford Town Centre (pages 84 – 85);
- 6 Policy D3: Historic Environment (page 103);
- 7 Policy I1: Infrastructure and Delivery (pages 108 – 110); and
- 8 Policy A7: Land and Buildings at Guildford Railway Station (pages 140 – 142).

Spatial Vision

As a general principle, SRG welcomes the Spatial Vision's preference for meeting the identified need for residential development on existing brownfield sites. However, given the emphasis placed on encouraging the effective use of brownfield land contained in the NPPF (paras 17 and 111), we consider that significantly greater emphasis needs to be incorporated in the Vision to reflect the Government's national policy imperative.

The Spatial Vision identifies that over 2,800 dwellings are proposed in the Borough's urban areas which take advantage of the existing infrastructure and services, reduce the need to travel and offer alternative modes of transport to the private car. However it is noted, from Table 1: *Planned Delivery between 2018 and 2033*, that only 1,172 dwellings are, in fact, proposed within Guildford Town Centre - i.e. just 8.5% of the Borough's total.

Given that the Vision goes to confirm that not all of the Borough's development needs can be met within Guildford's urban areas – indeed some 80% of the total residential need is proposed either on 'greenfield' or Green Belt land (Table 1: *Planned Delivery between 2018 and 2033*) we would suggest that, as a matter of principle, the Vision should strongly encourage that opportunities to maximise residential development and make the best use of land in the Town Centre should be taken. This will help to ensure that the need to take 'greenfield' or Green Belt land is minimised.

We would suggest that this approach would more accurately and appropriately reflect Government green belt policy, which at paragraph 84 of the NPPF indicates that:

"When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary."

We consider that the Vision should be more strongly expressed to espouse this principle, rather than simply suggesting that existing brownfield sites are the "*preferred location*". We would therefore suggest, to ensure consistency with national policy and Plan soundness, that the following text (underlined) should be added to the third paragraph of the Spatial Vision as follows:



"The plan provides for the delivery of 13,860 additional homes by 2033. As the preferred location for this development is on existing brownfield sites in the urban areas, opportunities to maximise residential development and make best use of land in these locations must be taken. Over 2,800 units are proposed in the urban areas which take advantage of the existing infrastructure and services, reduce the need to travel and offer alternative modes of transport to the private car....."

We also note that the Vision recognises that the growth proposed in the plan is predicated on the delivery of the necessary infrastructure. The referenced Infrastructure Schedule contained at Appendix C specifically includes "Guildford rail station capacity and interchange improvements"; thus recognising that the station improvements proposed in Policy A7 (which SRG propose to bring forward), which form part of increasing passenger capacity at Guildford Station, also make an important contribution to providing the necessary infrastructure to support the planned growth.

By way of commentary, we would note that delivering the necessary infrastructure can also be predicated on ensuring that there is sufficient income producing residential and commercial development. NPPF recognises (para 173) that careful attention must be given in plan making and decision taking to scheme viability including where there are, as is the case at Guildford Station, contributions to infrastructure.

Policy S2: Borough Wide Strategy

Policy S2 confirms (in the preamble at para 4.1.6) that the preference within the plan is to focus growth in the most sustainable locations, making the best use of previously developed land including within Guildford Town Centre and that 13,860 dwellings will be provided in the Plan period.

However, despite this stated preference, *Table 1- Planned Delivery between 2018 and 2033* confirms as stated above that only 1,172 units - i.e. just 8.5% of the total dwellings requirement will be directed to Guildford Town Centre.

Consistent with our comments above, we consider that much greater emphasis should be placed on maximising opportunities to meet housing need on sustainable brownfield land with the Town Centre. Such an approach would also be consistent with draft Policy H1: Homes for All – see comments below.

We would therefore suggest that after the first paragraph the following sentence should be added:

"In bringing forward development, there will be a strong preference to focus and maximise growth in the most sustainable locations, particularly within Guildford Town Centre and other urban areas, making the best use of previously developed land."

Policy H1: Homes for All

Policy H1 confirms that, new residential development is required to make the most efficient use of land and that densities will vary dependent upon the local area context and character and the sustainability of the location but higher density development will be supported in Guildford town centre. The policy's reasoned justification (at para 4.2.8) confirms that there is a responsibility to use natural resources, such as land, wisely and that efficient use of land is "essential."



SRG supports the above, particularly given that the draft Local plan currently envisages 80% of new dwellings being delivered on 'greenfield' and/or Green Belt land (Ref: Table 1: Planned Delivery between 2018 and 2033), recognising such an approach to be consistent with the NPPF.

Policy H2: Affordable Homes

Draft Policy H2 is inconsistent with the NPPF and unsound because it does not expressly deal with development viability and deliverability, notwithstanding this is recognised within the reasoned justification to the policy (at paras 4.2.39-40).

The latter recognises that there may be some circumstances where abnormal costs would make scheme delivery unviable and that, where developers demonstrate to the Council's satisfaction that providing the amount of affordable housing required by this policy would not be economically viable, they will adopt the following cascade mechanism to assist with delivering a scheme:

- 1 vary the tenure mix of the affordable housing (for example, more intermediate housing and less rented housing), size, and/or type of homes to be provided; and
- 2 reduce the overall number of affordable homes.

The draft policy itself, like Policy H11 of the saved 2003 Local Plan, is recognised to then rely upon the 2011 Planning Obligations SPD which indicates that, where it is not viable for a development to meet all the requirements of this SPD (i.e. including affordable housing), a flexible approach will be taken by the Council. We consider the approach to be taken where proposed developments – for whatever reason – are found to be unable to support affordable housing at the prescribed 40% level, should be addressed in the policy itself, given the importance of deliverability within the NPPF.

We would therefore suggest that the following text should be added after the second paragraph:

"Where developers demonstrate to our satisfaction (informed by an independent expert critique) that the amount of affordable housing proposed is the maximum amount a scheme can afford, as a consequence of abnormal costs or other circumstances, this Policy will be treated as being satisfied, subject to agreement to the introduction of a 'cascade mechanism' within the S106 planning obligation so as to contemplate alternative provision should development viability so allow in the future. ."

Policy E7: Guildford Town Centre

We consider the policy itself provides the appropriate strategy for the town centre, but requires some amendment to be internally consistent with other parts of the LP and increase consistency with the NPPF.

We therefore suggest introducing an additional bullet, consistent with the site allocation for one of the centre's key strategic sites, to read:

- "an improved railway station and interchange, facilitated by a comprehensive residential-led mixed use redevelopment of the Station site."

We would also suggest that bullet point 3 should be amended as follows to reflect our comments above:



- A minimum of 1,172 new homes, particularly on upper floors as part of mixed use developments;

Policy D3: Historic Environment

As currently expressed, we do not consider Policy D3 to be consistent with the NPPF (paras 126 - 134) as the distinction between development that leads to "*substantial*" harm of a heritage asset as opposed to "*less than substantial harm*" is not made clear.

Paragraph 2 of draft Policy D3 states that works which would cause harm to the significance of a heritage asset, whether designated or non-designated, or its setting, will not be permitted without a clear justification to show that the public benefits of the proposal considerably outweigh any harm to the significance or special interest of the heritage asset in question.

Where there is "*substantial*" harm to a heritage asset the NPPF makes clear that the relevant test is whether the substantial harm is necessary to achieve substantial public benefits that outweigh the harm. However, where there is "*less than substantial harm*" the NPPF advises that the decision-maker should weigh the harm against the public benefits of the proposal.

We would suggest therefore that this distinction should be reflected in Policy D3 so that the second paragraph reads:

"Heritage assets are an irreplaceable resource and works which would cause *substantial* harm to the significance of a heritage asset, whether designated or non-designated, or its setting, will not be permitted without a clear justification *to demonstrate that substantial harm is necessary to achieve substantial public benefits that outweigh the harm.* Where the harm is assessed to be *less than substantial* this harm will need to be weighed against the public benefits of the proposal."

Policy I1:

We support the LP's intention to ensure that the necessary infrastructure is in place to support the development needs. We support the approach of this policy, save for the priority given to the Thames Basin Heath SPA over all other site specific contributions, as this absence of flexibility is inconsistent with the Council's approach to all other S106 obligations. It is appropriate for the Council to review its current SPA policy through this LP, in accordance with the NPPF and the weight it attaches to, for example, sustainability, economic considerations and housing delivery.

Draft Policy P5 contemplates situations where the integrity of the SPA may be protected through different liner thresholds or alternative mitigation measures and the reasoned justification to the policy that the Council's established pre-cautionary principle may be reviewed by its JSPB in the future. Furthermore, the legal requirement, enshrined in European Law, may well change as a consequence of the UK leaving the European Union.

We therefore suggest that the fourth para of Policy I1 be deleted.



Policy A7: Land and Buildings at Guildford Railway Station

First, we note that the extent of this allocated site (Policy A7) broadly reflects the SRG site and that that the land to the west of Guildford Station is, appropriately, the subject of a separate site allocation (Policy A8)..

As a matter of principle SRG supports the proposal for the “*Comprehensive mixed use development*” on its Station site...incorporating “*improved transport and interchange facilities*”

Policy A7 states that mixed use redevelopment is to include “approximately 350 homes (C3), 500 sqm of comparison retail, 700 sqm of convenience retail and 1,500 sqm of Class A3 and 1 gym (D2 use), but the evidence underpinning this is unclear beyond the derivation of these figures from estimates in the LAA.

The SRG planning application proposes 438 homes, 3,642 sqm of station retail/financial & professional/ food and drink and leisure floorspace (Class A1/A2/A3/Sui Generis and D2 uses) as well as 2,104 sqm of office space (B1 use). However,

The 350 dwelling capacity has been arrived at from the application of a range of suitability, availability and achievability factors, including a consideration of the site by planning officers, in the 2016 Land Availability Assessment. The LAA also, inappropriately identifies the delivery of this draft allocation within the next 6-10 years, when there is a reasonable prospect that the site will be fully redeveloped within the 0-5 years period of a Local Plan adopted in earlier 2018.

Given the need to make efficient use of land (draft Policy H1 and Policy A7 ‘Opportunities’) and noting the preferred location for new homes is on most sustainable locations making the best use of previously developed land including within Guildford Town Centre (Spatial Vision/Policy S2), we consider that the SRG site, informed by the design-led approach of the SRG application scheme, has the potential to provide circa 425 to 450 dwellings.

We concur that the improvements to the station and its interchange facilities should include improvements quantitative and qualitative improvements to the associated retail offer, as well offices and assembly and leisure uses, as part of a comprehensive redevelopment. However, whilst the amount of additional floorspace is appropriate for the station location on the edge of the town centre, there is no evidence to support the scale of each element in the Council’s 2014 Retail and Leisure study evidence base.

We consider therefore that Policy A7 should be amended to more closely align with the residential capacity potential of this site and that the ‘Allocation bullets’ be amended to read:

- Improved transport and interchange facilities,
- Approximately 450 homes (C3),
- Additional retail (convenience and comparison) and food and drink offer, and
- Additional complementary offices and assemble & leisure uses.



There is only an opportunity to do so through the site's redevelopment. This site allocation should recognise that the delivering of significant station improvements will be funded through the commercial redevelopment whose viability will be affected as a consequence.

We also consider that the soundness of Policy A7 requires the 'Opportunities' section explain that the improvement of the station infrastructure at Guildford Station, consistent with the Infrastructure Schedule contained at Appendix C which specifically includes "*Guildford rail station capacity and interchange improvements*", will be funded through the commercial redevelopment whose viability will be affected as a consequence.

Finally, the last bullet point under Requirements section, seeking to avoid development within zone 2, is unnecessary given the preceding flood risk requirements. It should therefore be deleted.

We consider the above amendments to Policy A7 are necessary to render the policy sound.

Concluding Remarks

SRG supports much of the draft Local Plan's spatial vision and strategy and suggests amendments which seek to provide a more positive policy framework for the delivery of the desired comprehensive mixed use redevelopment of the station site (A7).

SRG would welcome the opportunity to participate at the Examination, to contribute to the discussion of the Inspector's questions arising from our representations and their implications and thereby assist to ensure the Plan is sound and compliant,

Please contact Steven Butterworth or Dennis Pope to discuss these representations

Yours faithfully

A handwritten signature in black ink, appearing to read 'Loe' followed by a stylized flourish.

Nathaniel Lichfield & Partners



ANNEXE 2: Lichfields Review of Guildford's objectively assessed need (OAN) evidence

Review of Guildford's objectively assessed need (OAN) evidence

Our ref 12919/SB/DP/BHy
Date June 2017

1.0 Introduction

1.1 This report has been produced by Lichfields to review the objectively assessed housing need (OAN) evidence that underpins the proposed submission version of the Guildford Borough Local Plan – Strategy and Sites (2017).

2.0 Background

Policy Context

National Planning Policy Framework

2.1 The National Planning Policy Framework (NPPF) outlines that Local Planning Authorities (LPAs) should positively seek opportunities to meet the development needs of their area (paragraph 14) and that in order to ‘boost significantly’ the supply of housing that they should:

“use their evidence base to ensure that their Local Plan meets the full objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this framework...” (Paragraph 47).

2.2 The NPPF outlines the evidence required to objectively define housing needs within an area, setting out that Local Planning Authorities should (paragraph 159);

“Prepare a Strategic Housing Market Assessment to assess their full housing needs...identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which;

Meets household and population projections, taking account of migration and demographic change;

- *Addresses the needs for all types of housing, including affordable housing...; and*
- *Caters for the housing demand and the scale of housing supply necessary to meet this demand.”*

2.3 Furthermore, the core planning principles set out in the NPPF indicate that a planned level of housing to meet objectively assessed housing needs (OAHN) must respond positively to wider opportunities for growth and should take account of market signals, including housing affordability (paragraph 17).

Planning Practice Guidance

2.4 The Planning Practice Guidance (PPG) contains a section providing guidance on housing and economic development needs assessments. The PPG indicates that there is no one methodological approach or use of a particular dataset(s) that will provide a definitive assessment of development need (paragraph 005), but goes on to outline an overarching methodology for preparing need assessments in a transparent manner. The PPG identifies that an objective assessment of need should fulfil the following criteria:

- Be proportionate and not consider purely hypothetical scenarios, only future scenarios that could reasonably be expected to occur (paragraph 003);
- Be based on facts and unbiased evidence. Constraints should not be applied to the overall assessment of need (paragraph 004);
- Utilise household projections published by the Department for Communities and Local Government as the starting point estimate of overall housing need (paragraph 015);
- Consider sensitivity testing, specific to local circumstances, based on alternative assumptions in relation to the underlying demographic projections and household formation rates (paragraph 017); and

2.5 Take account of employment trends (paragraph 018), appropriate market signals including market indicators of the balance between the demand for and supply of dwellings (paragraph 019) and affordable housing needs (paragraph 029).

Relevant legal judgments

2.6 Whilst the above sets out the overarching approach to identifying objectively assessed needs drawing upon the NPPF and PPG, a number of high court judgments have looked at the interpretation and application of the policy and guidance, providing helpful direction.

2.7 The approach to objectively assessing housing needs and setting housing requirements (including the fundamental differences between the two) has been brought into sharp focus following the high court judgment ‘(1) Gallagher Homes Limited and (2) Lioncourt Homes Limited v Solihull Metropolitan Borough Council [2014] EWHC 1283’, referred to as “*Solihull*”, which reiterates the imperative need to firstly identify the full objectively assessed need for housing and then define a strategy which seeks to meet it, consistent with the NPPF. The Solihull judgment is useful in clarifying the distinction between OAN and a housing requirement as set out below;

“ii) Full Objective Assessment of Need for Housing: This is the objectively assessed need for housing in an area, leaving aside policy considerations. It is therefore closely linked to the relevant household projection; but is not necessarily the same. An objective assessment of housing need may result in a different figure from that based on purely demographics if, e.g., the assessor considers that the household projection fails properly to take into account the effects of a major downturn (or upturn) in the economy that will affect future housing needs in an area. Nevertheless, where there are no such factors, objective assessment of need may be – and sometimes is – taken as being the same as the relevant household projection.

iii) Housing Requirement: This is the figure which reflects not only the assessed need for housing, but also any policy considerations that might require that figure to be manipulated to determine the actual housing target for an area. For example, built development in an area might be constrained by the extent of land which is the subject of policy protection, such as Green Belt or Areas of Outstanding Natural Beauty. Or it might be decided, as a matter of policy, to encourage or discourage particular migration reflected in demographic trends. Once these policy considerations have been applied to the figure for full objectively assessed need for housing in an area, the result is a “policy on” figure for housing requirement. Subject to it being determined by a proper process, the housing requirement figure will be the target against which housing supply will normally be measured.” (Lichfields Emphasis).

2.8 Solihull also confirms and reiterates the earlier judgment in ‘St Albans City and District Council v (1) Hunston Properties Limited and (2) Secretary of State for Communities and Local

Government [2013] EWCA Civ 1610' (“*Hunston*”) in respect of the interpretation of para 47 of the NPPF; namely that meeting the full objectively assessed needs for market and affordable housing in the housing market area applies to both plan-making and decision-taking and that constraining factors should not be applied to the full OAN.

Legal judgments – affordable housing needs

- 2.9 There are a number of relevant legal judgments which have considered the application of the PPG in assessing needs, particularly with regard to affordable housing;
- 1 *Oadby and Wigston* - The role of policy considerations, in particular the Private Rented Sector (“PRS”), as part of OAN have been highlighted in the High Court Judgment ‘Oadby and Wigston Borough Council and (1) Secretary of State for Communities and Local Government and (2) Bloor Homes Limited [2015] EWHC 1879’, which clarified that the subsidised PRS sector did not constitute affordable housing and could not be used to offset these needs.
 - 2 *Satnam* - Also relevant to this review is the High Court judgment ‘Satnam Millennium Limited and Warrington Borough Council [2015] EWHC 370’, referred to as “Satnam”. This sets out the importance and need to undertake the ‘proper exercise’ when assessing affordable housing needs and consider full affordable housing needs within the conclusion on full OAN.
 - 3 *Kings Lynn* - Whilst “Satnam” establishes the fact that full OAHN must include affordable housing needs, “Kings Lynn” (‘Kings Lynn and West Norfolk Borough Council v (i) Secretary of State for Communities and Local Government and (ii) Elm Park Holdings [2015] EWHC 1958’) establishes how full affordable housing needs should be addressed as part of a full OAN calculation. The judgment identifies that it is the function of a SHMA to address the needs for all types of housing including affordable, but not specifically to meet affordable housing needs in full.

The judgment is clear that the correct method for considering the amount of housing required to meet full affordable housing needs is to consider the quantum of market housing needed to deliver full affordable housing needs (at a given percentage). However, as the judgment sets out, this can lead to a full OAN figure which is so large that a Local Planning Authority would have “*little or no prospect of delivering (it) in practice*”. Therefore, it is clear from this judgment that although it may not be reasonable and therefore should not be expected that the OAN will include affordable housing needs in full, an uplift or similar consideration of how affordable needs can be ‘addressed’ is necessary as part of the full OAN calculation. The inference is that OAN would need to address affordable housing needs up to a point at which there is little prospect of delivering it. It ultimately concludes (para 36) that affordable housing needs “*should have an important influence increasing the derived FOAN since they are significant factors in providing for housing needs within an area.*” This reflects para 159 of the NPPF.

3.0 Review of objectively assessed need

- 3.1 The evidence base for housing needs in Guildford Borough comprises the West Surrey Strategic Housing Market Assessment (2015) (“the SHMA”) and the subsequent West Surrey Strategic Housing Market Assessment: Guildford Addendum Report 2017 (“the addendum”).
- 3.2 The SHMA concluded on OAN for Guildford of **693** dpa over the 20 year period 2013-33. Across the HMA, the OAN amounts to 1,729 dpa, as shown in Table 1.

Table 1 Summary of OAHN for West Surrey HMA (2013-33)

	Guildford	Waverley	Woking	West Surrey
2012-based projections	517	493	341	1,351
Economic Growth	+120	0	+130	+250
Improving affordability	+31	+26	+46	+103
Student Growth Impact	+25	0	0	+25
Concluded OAN	693	519	517	1,729

Source: West Surrey SHMA (2015)

3.3

Within the addendum, which only provides an update to the OAN for Guildford, it is concluded that the OAN for Guildford has reduced from 693 dpa to **654** dpa. A comparison of OAN for Guildford in SHMA and the addendum is shown in Table 2.

Table 2 Comparison of Guildford Outcomes from SHMA and Addendum

Component	Joint West Surrey SHMA (2013-33)		Guildford Addendum (2015-34)	
	Assessment and conclusion	dpa	Assessment and conclusion	dpa
Starting-point projections	2012-based projections incl. 4.23% vacancy/second home rate	533	2014-based projections incl. 2.3% vacancy/second home rate	557
Demographic-led need	2012-based projections adjusted for 2013 MYE <u>Alternative scenarios:</u> 1. 12 yr migration trend – 744dpa 2. UPC adjustment – 239dpa 3. London migration – 568dpa	517	2014-based projections rebased for 2015 MYE <u>Alternative scenarios:</u> 1. 10 yr migration trend – 584dpa 2. 10 yr migration+UPC – 521dpa	577
Economic growth	<u>Job growth:</u> AECOM triangulation of three 2015 economic forecasts (CE, Experian and OE) with forecast workplace job growth averaging 0.9% p.a. and equivalent to 885 jobs p.a. <u>Economic activity rates:</u> bespoke drawn from forecasts and NOMIS.	637 (+120)	<u>Job growth:</u> AECOM triangulation of three Nov 2016 economic forecasts (CE, Experian and OE) with forecast workplace job growth averaging 0.7% p.a. and equivalent to 679 jobs p.a. <u>Economic activity rates:</u> 1. OBR with adjustment - 579 2. Experian assumptions - 555 3. 2015 SHMA approach - 584	579 (+2)
'Improving affordability' (Market signals)	Market signals uplift required. Applied through improving the household formation rates of the 25-34 age group back to the 2001 levels against economic growth scenario.	668 (+31)	Market signals uplift required. Applied through improving the household formation rates of the 25-34 age group back to the 2001 levels against economic growth scenario.	631 (+52)
Student growth impact	Adjustment to account for stronger than trend student growth assumed by Uni of Surrey (growth of 6,300 students over period).	+25	Similar adjustment, but with slightly reduced assumption on student growth of 3,800.	+23
Affordable housing	455dpa affordable housing need. Equivalent to 1,138 dpa total delivery to meet need. Suggests this is addressed within market signals.	n/a	517dpa affordable housing need. Equivalent to 1,293 dpa total delivery to meet need. Suggests this is addressed within market signals.	n/a
Concluded Guildford OAN	693 dpa		654 dpa	

Source: West Surrey SHMA and Guildford Addendum

3.4

This illustrates that, despite the starting point and affordable housing needs increasing between the two assessments, the overall conclusion on OAN has reduced. This is predominantly based on the scale of housing needed to support economic growth significantly reducing in the assessment (from 637dpa to 579dpa).

Assessing needs across the HMA

- 3.5 The NPPF at para 159 requires local authorities to have “*a clear understanding of housing needs in their area*” and to do this through “*a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries*”.
- 3.6 Assessment of need across an HMA is highlighted at length in the PPG and is necessary in making robust assessments of need, not least because statistical fluctuations in the population and household projections at a local authority are often levelled out when looking at the HMA. Issues can arise where authorities within a HMA ‘pick and mix’ different population and/or household projections to underpin their evidence base – if sources are inconsistent, this can lead to unmet housing need as lower projections in one authority are often offset by increased projections elsewhere in the HMA. It will also mean a local authority could, logically, not have a “*clear understanding*” of the needs in their area, conflicting with para 159.
- 3.7 The last assessment of housing need which was produced for the HMA using consistent data and assumptions is the SHMA (published in September 2015). Since then, the authors of the SHMA (GL Hearn) have undertaken an addendum update for Guildford only. However, this does not form an updated, HMA-wide assessment, and as such it is not clear from that assessment what the impact will be of using different data and assumptions for Guildford on the concluded needs of the HMA overall.
- 3.8 It would be inconsistent with the guidance and with the principle purpose of HMAs to selectively ‘update’ housing needs assessments for areas within the HMA, especially where that assessment seeks to reduce needs in that specific area. To do so would likely lead to unmet need in the HMA, since the implications across the HMA as a whole have not been assessed on a consistent basis. For example the reduction in employment growth forecast for Guildford may simply be reflective of increasing forecasts elsewhere in HMA (which is now not reflected on a consistent basis). GL Hearn has provided no justification to rationalise its approach in Guildford and demonstrate there would be no impact on need elsewhere in the HMA.
- 3.9 The issue of consistency across HMAs was raised by the Inspector into the West Oxfordshire Local Plan. Following the publication of the Oxfordshire-wide SHMA, West Oxfordshire Council commissioned further evidence and attempted to conclude that their housing need was lower than concluded in that SHMA. The Inspector, in his interim findings (December 2015), rejected the Council’s attempts to justify a lower number, noting;
- “Joint working across an HMA is essential to ensure a reasonably consistent approach and to avoid unintended distortions in the market. In addition, the credibility of the SHMA is the foundation on which much of the current planning work for the rest of Oxfordshire is based. That does not mean it should be beyond criticism, but a Council should be particularly mindful of the wider implications of criticisms and of the reasoning supporting any local adjustments.” (para 3.4)*
- “The Council’s evidence to support its housing requirement has been worked-up independently of its partners in the rest of the HMA without due regard for consistency across the HMA and the potential wider implications of its actions” (para 10.1)*

“...The SHMA provides a recommended housing figure for West Oxon ... If... the Council wants to do further work... then it is essential that the methodology is first shared with its partner authorities in the HMA and that the Council considers any concerns raised. The conclusions of the Council’s work will also need to be shared and the implications considered...” (para 10.5).

- 3.10 Notwithstanding the overarching issues with selectively updating housing needs assessments for only parts of a HMA as set out above, the below sets out a review of the addendum for Guildford to assess whether it reflects appropriate the guidance set out in the NPPF and PPG, and clarified in recent case law.

The starting point and demographic-led needs

- 3.11 The addendum adopts a new base period of 2015-34; this has the effect of ‘wiping the slate clean’ unless any need or demand which has not been met in the interim (i.e. 2013-15) is accounted for elsewhere in the calculation, for example by way of additional market signals uplift (this is considered later under ‘market signals’). As established in the High Court Judgment *Zurich*¹ there is no definitive period for which assessments of need are required, and all periods are self-contained (adding backlog from earlier years would be mixing ‘apples with oranges’, as per para 95 of *Zurich*). However, it would be expected that shortfall in housing provision in years prior to the assessment period (in this instance, 2015) would be manifested, for example, through deteriorating affordability. This would then be used within the assessment to justify an uplift to the OAN for the period 2015 onwards, indirectly addressing shortfall previous, albeit this is on the assumption that such uplift responds to the scale of worsening affordability
- 3.12 Over the twenty year period 2013-33 (which is comparable with the SHMA), the 2014-based household projections (used in the addendum) project average annual household growth of 570 per annum, which is 59 per annum more than the 2012-based projections for the same period (which were used in the SHMA). Over the addendum’s new projection period (2015-34), household growth based on the 2014-based projections amounts to 545 households per annum (557 dwellings per annum), increasing slightly to 563 households per annum (577 dpa) when taking into account the 2015 Mid-Year Estimates. The SHMA also undertake some analysis of alternative migration scenarios based on ten year trends (584 dpa) and ten year trends with an adjustment for Unattributable population change (UPC) (521 dpa) but does not conclude on either as an alternative to the SNPP.

London

- 3.13 The issue of changing demographic trends with London will play a role in increasing housing need in the area, because the assumptions which underpin the scale of housing need set out in the London Plan (which come from the London SHMA 2013) assume that as the economy recovers from recession there will be more out-migration from London and less migration to London. It is important to note that these are not London’s unmet needs. Rather, the increase in need across the South East is associated with changes in migration patterns that the Greater London Authority (GLA) think will happen as the wider economy improves, leading to more out-migration from London than seen during the period around the recession, which is included in the trend period from which current future projections draw. This is irrespective of London’s capacity for housing, and is a [assumed] demographic change associated with economic factors. These assumptions were ‘signed off’ by the Inspector into the Further Alterations to the London

¹ Zurich Assurance Limited v Winchester City Council and South Downs National Park Authority [2014] EWHC 758, paras 92-97

Plan and the Mayor of London has highlighted these changes to migration patterns to a number of local planning authorities across the South East.

- 3.14 Given the proximity of the HMA to London and the functional linkages it has with the capital, it would be reasonable (indeed necessary) to take this into account when looking at demographic-led needs in West Surrey. The SHMA clearly noted the significance of London (see SHMA para 4.67-73) and assessed a 'London migration' scenario for the HMA. This showed that taking into account migration from London would increase housing need compared to the SNPP by 51 dpa (568 dpa under the London scenario compared to 517 dpa using the 2012-based household projections and 2013 MYEs) (see SHMA Table 25). However, we note that the SHMA ultimately failed to take into account its London scenario in its conclusion on OAHN for the HMA, despite this clearly being a specific 'local circumstance' which would warrant departure from the SNPP (as cited in the PPG ID 2a-017).
- 3.15 The Guildford addendum concludes (at para. 3.43) that as net migration between Guildford and London has been relatively stable since 2008/09, no adjustment is required to the SNPP to account for future increases from London. It goes on to state that "*the evidence does not point to a particular 'recessionary influence' on migration flows or show an increase in net flows from London as the economy has recovered since 2012*" (addendum para 3.46). This is entirely contrary to the conclusions reached in the SHMA, despite the only new data being 2 additional years of MYEs which continue to show low net migration from Guildford to London (see addendum Figure 4). There evidently was a recessionary influence, seen by the significant drop in net migration from London to Guildford in 2008/09. Further, it would not necessarily be expected that an increase in net flows from London would be seen beginning in 2012 as implied in the addendum; the GLA's assumptions about changing migration assume these changes are not seen until post-2017 to allow for adequate recovery to the economy.
- 3.16 It is also worth noting that the higher growth projected in the 2014-based SNPP reflects higher levels of international migration seen in the six years to 2014 (than in the six years to 2012, as shown in table 1 of the addendum) coupled with higher international migration projected in the 2014-based SNPP for England overall. This increased growth should not be seen as reflective of increased future growth from London. As shown in Figure 4 of the addendum, net migration with London has been maintained at the relatively low levels seen since 2008/09, hence requires some manual upward adjustment to reflect the GLA's assumptions of more migration from London to the South East post-2017.

Summary

- 3.17 The omission of an adjustment for London is a significant flaw in both the SHMA and the addendum, leading to an under-estimate of future demographic-led need in both Guildford and the West Surrey HMA. Whilst a sensitivity was undertaken in the West Surrey SHMA, which showed an increase in need in Guildford under the London migration scenario, this was not incorporated into the SHMA's conclusions on OAHN. In the addendum, despite there being no significant change in the evidence, it is concluded that no adjustment is required. This is despite the evidence for Guildford in particular clearly showing that net migration fell significantly in the immediate aftermath of the recession, and has yet to begin recovering.
- 3.18 Overall the addendum has failed to sufficiently demonstrate that an adjustment for London should not be made, and in doing so has under-estimate future demographic-led housing need for Guildford (and the HMA in the SHMA).

Economic Growth

- 3.19 With regards to employment-led needs, there are two aspects of the relevant section of the PPG (Reference ID: 2a-018 20140306). The first relates to the scale of job growth within the HMA:
- “Plan makers should make an assessment of the likely change in job numbers based on past trends and/or economic forecasts as appropriate and also having regard to the growth of the working age population in the housing market area...”*
- 3.20 The second then relates to the issues associated with areas where there is a mismatch, and refers to the issues of unsustainable commuting patterns and the resilience of local businesses. It states:
- “Where the supply of working age population that is economically active (labour force supply) is less than the projected job growth, this could result in unsustainable commuting patterns (depending on public transport accessibility or other sustainable options such as walking or cycling) and could reduce the resilience of local businesses. In such circumstances, plan makers will need to consider how the location of new housing or infrastructure development could help address these problems.”*
- 3.21 In determining the overall scale of job growth the SHMA used forecasts from Cambridge Econometrics, Experian and Oxford Economics dated 2015. These sources showed growth of between 0.6% and 1.1% per annum for Guildford, averaging 0.9% per annum (amounting to 17,700 jobs in Guildford) which was applied within the assessment of need. For Guildford, this showed a need for 637 dwellings per annum.
- 3.22 The addendum applies an updated forecast of growth using forecasts dated 2016, which show growth of 0.7% per annum, amounting to growth of 12,893 jobs over the [new] projection period 2015-34. However, it does not present any analysis to show what the impact of this reduced forecast of growth in Guildford is across the rest of the HMA. It may be the case that lower growth in Guildford is simply offset by higher forecast growth in the rest of the HMA, where the other two Districts (Woking and Waverley) would need to increase their level of housing provision to account for higher levels of job growth. The risks associated with adopting this ‘pick and choose’ approach are set out in detail above in paragraphs 3.8-3.9, primarily the risk of creating unmet need as the need for more housing elsewhere in the HMA is unaccounted for.

Summary

- 3.23 The addendum has failed to demonstrate that lower job growth in Guildford is not countered by higher job growth elsewhere in the HMA. The most recent assessment undertaken consistently across the HMA is that within the SHMA, which demonstrated a need for 637 dwellings per annum in Guildford. If the new forecasts show lower growth in Guildford but higher growth in Waverley and Woking, the housing needs in those areas will need to be increased to balance the reduction in Guildford. For Guildford to reduce its OAN on the basis of lower job growth without considering the impact of updated forecasts across the HMA risks creating unmet need in the housing market area, reducing the resilience of local businesses or generating unsustainable commuting patterns.

Market signals

- 3.24 The SHMA and addendum consider a response to market signals has been adequately addressed by making an adjustment to household formation rates for 25-34 age group . However this is wholly insufficient because:

- The PPG indicates that adjustments to household formation rates and for market signals are separate stages in the calculation (headship rates in ID 2a-015 and market signals in ID 2a-020);
- Modelling household formation as a precise response for market signals doesn't seek to consider what impact it has on improving affordability. Market signals/affordability affects other age groups, and the PPG is clear that the purpose of a market signals uplift is to provide more than the household projections, hence it is necessary for any market signals uplift to be in excess of the figure suggested by the household projections.
- Overall uplift in Guildford of 9.0% above demographic/economic-led needs is exceptionally modest in the context of the affordability pressure that exists in the District and unlikely to be a sufficient response to market signals.

Waverley Local Plan – Inspector’s Initial Questions

3.25 The approach in the West Surrey SHMA (which is the same as that in the addendum) has already been considered in Waverley. The Local Plan Inspector’s Matters and Issues for Examination (ID-3) (April 2017) stated;

“...having considered the written evidence, I do not consider that the OAN adjustment to improve affordability is adequate. Focusing on household formation suppression for one age group results in a very minor uplift and I have seen no evidence that this would improve overall affordability. The lowest quartile affordability ratio is extremely poor. In evaluating the scale of uplift required to improve affordability it is not adequate simply to benchmark against neighbouring authorities and I do not accept the argument that uplift will not improve affordability; such an approach is contrary to Planning Policy Guidance. Evidence is required to demonstrate clearly a link between uplift and improved affordability”.

With the approach put forward in the SHMA already in question by the Waverley Local Plan Inspector it is unlikely that the same approach in Guildford can continue to be considered adequate. As such, an alternative approach to market signals is set out below, reflecting the requirements of the PPG.

Approach to market signals - PPG

3.26 The PPG sets out a clear two-stepped process to addressing market signals within the calculation of OAN:

- 1 Firstly, to determine **whether** a market signals uplift is necessary. This is set out in PPG ID2a-019 within the first sub-paragraph as follows:

“Appropriate comparisons of indicators should be made... A worsening trend in any of these indicators will require upward adjustment to planned housing numbers compared to ones based solely on household projections.”

- 2 Secondly, when a market signals uplift is required, to identify **what scale** that should be set at with guidance given that it should be set at a level that could be expected to improve affordability. This is set out in PPG ID2a-019 within the second and third sub-paragraphs as follows:

“In areas where an upward adjustment is required, plan makers should set this adjustment at a level that is reasonable... they should increase planned supply by an amount that, on reasonable assumptions and consistent with principles of sustainable

development, could be expected to improve affordability, and monitor the response of the market over the plan period.”

- 3.27 In respect of the evidence underpinning the Guildford local plan, the first step is not in dispute. The West Surrey SHMA assesses the market signals and concludes that affordability pressures in the West Surrey HMA are “significant” (page 115 - key messages), with affordability pressures described as “severe” and that an upward adjustment should be applied (para 7.47). It is the second step that is in dispute, and whether the SHMAs response to this can be viewed to be one that “on reasonable assumptions... could be expected to improve affordability”. As set out above, the Waverley Local Plan Inspector has already stated that the scale of uplift put forward in the West Surrey SHMA is insufficient.
- 3.28 For clarity, the West Surrey SHMA’s response to market signals is to adjust household formation (‘headship’) rates for the 25-34 year age band, so that they increase back to their 2001 levels (para 7.53), and this adjustment is applied on the employment-led scenario. This approach remains the same in the Guildford addendum, and is considered inappropriate in light of the Waverley Local Plan Inspectors initial comments and the guidance in the PPG, which is discussed in further detail below. The outcome of applying this headship rates adjustment in the SHMA in Guildford amounts to a 31 dpa uplift on the employment-led needs of 637 dpa (equivalent to an uplift of 5%) and in the addendum this amounts to a 52 dpa uplift on the employment-led needs of 579 (equivalent to an uplift of 9%).

The principle of market signals uplift to improve affordability

- 3.29 The purpose of a market signals uplift is to ensure the Government’s housing aims (as expressed in the NPPF) are met and to ensure this is reflected in assessments of need by making “upward adjustment to planned housing numbers compared to ones based solely on household projections” (PPG ID2a-020) where market signals indicate such an adjustment is necessary. The principle of providing ‘more’ than ‘unvarnished’ household projections in England has long been established through successive assessments of the country’s problems with lack of housing supply.
- 3.30 A literature review of these assessments is included at **Appendix 1**. They demonstrate, over a sustained period, a consensus over the need to increase supply above household projections to deliver improvements in housing affordability. This has continued to underpin successive Governments’ approach to assessing housing need, including within the PPG and more recently as recognised within the Housing White Paper. Across these reports, the evidence would suggest that - at the national level - an uplift of between **20.9% and 44.2%** above the number of homes implied by household projections alone would be necessary to deliver improvements in affordability.
- 3.31 Under the current planning system, achieving a national outcome for housing supply is the product of implementing a large number of individual local plans. As such it is fundamentally necessary to link any local strategies to the overarching national principles which are driving Government policy (i.e. ‘think global, act local’). Each area will have its role to play in contributing towards the Government’s aims; some more than others, based on their circumstances. This is explicitly acknowledged in the SHMA by GL Hearn (key messages, page 115 bullet point 3).
- 3.32 It is acknowledged that housing supply is but one factor influencing the affordability of housing (availability of credit and household incomes being two other key influencers), but the role of

the planning system in increasing supply to achieve this is clearly an important lever available to government, and one that it seeks to apply through PPG-compliant assessments of OAN.

- 3.33 Whilst the above places the market signals uplift within the national context, how this overarching principle, is applied to local evidence in Guildford and West Surrey is considered below.

How do we define an improvement in affordability?

- 3.34 The PPG states that the ratio between lower quartile house prices and the lower quartile income or earnings can be used to measure affordability and this is the metric around which we have focused our analysis in this paper. Although the PPG (ID: 2a-020) sets out that plan maker should “*increase planned supply by an amount that... could be expected to improve affordability*”, the reference case for that improvement is not stated. The PPG (ID2a-003) requires that the assessment of need “*should be proportionate and does not require local councils to consider purely hypothetical future scenarios, only future scenarios that could be reasonably expected to occur.*” In this regard, any improvement to affordability should be one that is reasonably expected to occur.
- 3.35 Measuring improvements in affordability should make reference not only to *current* levels of affordability but also to any forecast *change* in affordability were housing supply to progress at a level consistent with official projections. This must be set in the context that the lower quartile affordability ratio in Guildford was 12.2 in 2016, and has been steadily worsening in recent years (see most recent data released March 2017 in **Appendix 2**).
- 3.36 The Office for Budget Responsibility (OBR) produces forecasts of both house prices and wages and analysis on the inter-relationship between the two factors². We present analysis later in this note (and at **Appendix 3**) which applies these assumptions to Guildford; this forecasts that if housing supply increased in line with the OAN for Guildford set out in the addendum (i.e. at 654 dpa over the period 2015-34), the affordability ratio would worsen to 14.4 by the end of the plan period in 2034.
- 3.37 On this basis, we consider that, any increase in planned supply (as required by the PPG³) should as a minimum be such as to stabilise, and preferably improve given it is above the rest of the HMA, the current affordability ratio in Guildford (12.2). Even stabilising the affordability ratio at the current level would represent a better outcome than the reference case of continued worsening affordability in the District. This is a goal that was recognised by the NHPAU in its work and by the House of Lords Select Committee on Economic Affairs⁴ both of which we review in **Appendix 1**.

An evidence based market signals uplift for Guildford and West Surrey

- 3.38 There are numerous methodological approaches that can be adopted in seeking to quantify an appropriate market signals uplift for Guildford based on local evidence of affordability and market signals in the District and the HMA. The PPG does not set out a single definitive approach. Indeed, it suggests (ID: 2a-020) that the approach is one where – having established that an uplift is required:

² Working paper No.6: Forecasting house prices' (July 2014) Office for Budgetary Responsibility, Toby Auterson (paragraph 3.12) - http://budgetresponsibility.org.uk/docs/dlm_uploads/WPO6-final-v2.pdf

³ ID 2a- paragraph 20 3rd sub-paragraph

⁴ 'Building more homes' 1st Report of Session 2016–17 (15 July 2016) House of Lords Select Committee on Economic Affairs (HL Paper 20) - paragraphs 81 and 84 <http://www.publications.parliament.uk/pa/ld201617/ldselect/ldeconaf/20/20.pdf>

- 1 the adjustment should be one that is reasonable;
- 2 The scale of adjustment should be related to the relative scale of affordability constraints and other indicators of high demand. The greater the improvement in affordability needed, the larger should be the additional supply response;
- 3 Plan makers should not attempt to estimate the precise impact of an increase in housing supply;
- 4 They should increase planned supply by an amount that, on reasonable assumptions and consistent with principles of sustainable development, could be expected to improve affordability;
- 5 They should then monitor the response of the market over the plan period.

3.39 On the most simple basis, applying the scale of uplifts identified as required to address affordability at the national level of between 20.9% and 44.2% would indicate a housing supply requirement of between 697 and 832 dpa in Guildford (based on addendum's demographic-led need of 577 dpa). Naturally, such an approach assumes other Local Plans would also make appropriate adjustments for their market signals in accordance with Government policy.⁵

3.40 However, it is also clear that we need to look at the circumstances of Guildford in identifying an appropriate scale of uplift, given the greater problems of affordability in that district. We have therefore looked at a range of alternative approaches at the local level, and then draw these together to arrive at a conclusion as to the appropriate uplift.

1. OBR house price forecast and University of Reading model

3.41 The Office for Budget Responsibility (OBR) produced Working paper No.6 Forecasting house prices in July 2014⁶. The report identifies the following with regards to future average earnings growth and median house price growth (the components of an affordability ratio) in paragraph 3.12:

"Using some long-run assumptions for real income growth (2.2 per cent a year, including growth in the number of households of 1 per cent a year) and housing supply (keeping pace with the number of households), and assuming the housing discount rate and wage share variable are stationary, the model predicts around 3.3 per cent real house price growth a year in steady state. In addition, assuming consumer price inflation in line with the Bank of England's 2 per cent target implies 5.3 per cent a year nominal house price growth in steady state."

3.42 The University of Reading's affordability model, as set out previously, found a high price elasticity (-2.0) in relation to increases in stock at regional level in England, implying in effect that for every 1% increase in supply, relative prices would be expected to fall by 2%.

3.43 There has been some degree of economic change since July 2014. OBR's March 2017 economic outlook would indicate average house price growth of 4.80% per annum and peak average wage growth of 3.7% per annum over the period to 2022 (the horizon of OBR's economic outlook). Although different in absolute terms to its July 2014 assumptions, the difference between wage and house price growth is the same, i.e. the affordability outcomes under the same assumed rate of housing growth will be the same whether using OBR's July 2014 or March 2017 assumptions.

⁵ Evidence later in this document (and at Appendix 3) suggests this is now taking place across many SHMAs.

⁶ 'Working paper No.6: Forecasting house prices' (July 2014) Office for Budgetary Responsibility, Toby Auterson - http://budgetresponsibility.org.uk/docs/dlm_uploads/WPO6-final-v2.pdf

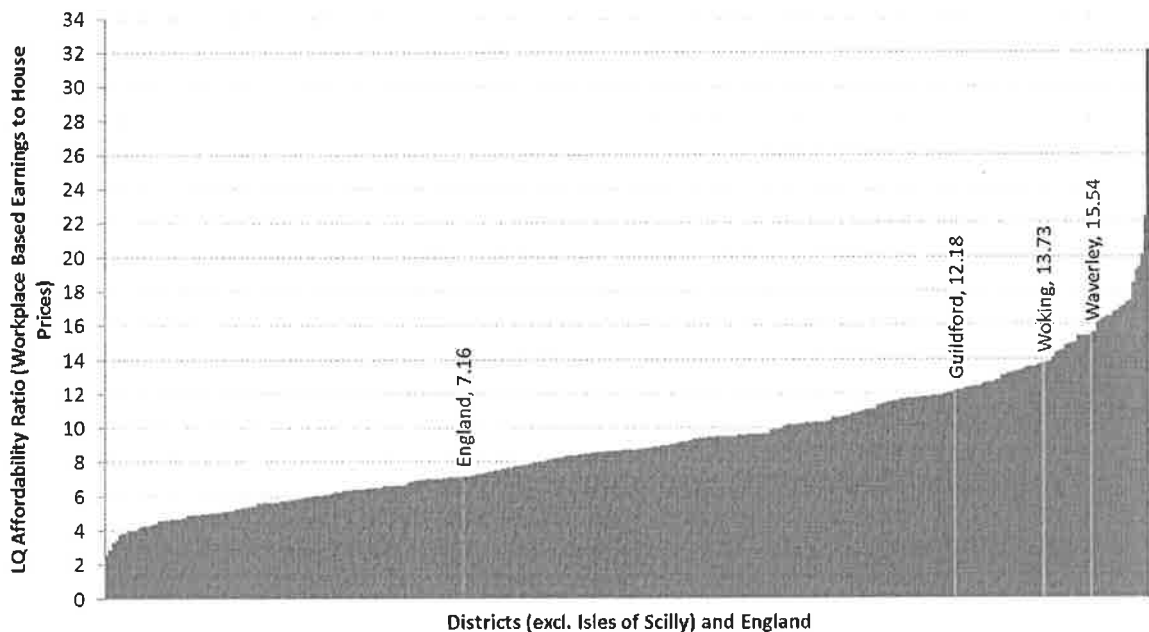
- 3.44 Based on the above reports, the District would need to deliver **873 dpa** on average over the period 2015-34 to maintain affordability at its current level (12.2) to 2022 (the horizon of OBR's economic forecast), or 987 dpa to maintain affordability at its current level to 2034 (the end of the plan period). This should be seen in the context that affordability within the projection period has already worsened, from 10.9 in 2015 to 12.2 in 2016. Evidently to return affordability to the level seen at the start of the plan period and even greater uplift would be needed. Lichfields' analysis shows that 1,224 dpa would be needed to bring affordability back to the 2015 level by 2034.
- 3.45 Even then, it should be noted the above modelling assumes a price elasticity of -2.0 which could be seen as cautious. Recent research by Regeneris⁷ indicates that at a Local Authority level a price elasticity of -1.0 is more appropriate (1% increase in supply brings about 1% fall in price) and better reflects factors at the local authority level (paras 4.19-4.22). However, this would involve taking a different view to the OBR position.

2. Guildford weighted apportionment of national needs

- 3.46 Guildford is relatively worse in respect of affordability than the national equivalent, with a lower quartile affordability ratio of 12.2 compared with 7.2 nationally. All other things being equal, to improve affordability across the country, Guildford, and its housing market area peers, would need to make a proportionately greater uplift than those where affordability issues are less acute. If we accept the national position set out above - that the minimum national level of delivery required is c.250,000 dpa (e.g. as in the July 2016 House of Lords Select Committee report – see paragraph 81) - then this would imply a 35,000 dwelling uplift above the 2012-based and 2014-based household projections (both at c.215k dpa). We can then consider how this required uplift should be shared between 320+ Local Planning Authorities across the country in order to seek to hold the affordability ratio (at least at a national level) constant. In doing so, we broadly adopt a localised version of the approach adopted by the NHPAU as summarised in Appendix 1.

⁷ Why supply matters: the elasticity of house prices at a local level (January 2016) Regeneris Consulting - <https://drive.google.com/file/d/oB3JZDh2pal1PaVJncno2dU92Tko/view>

Figure 1 Distribution of LQ Affordability Ratios 2016



Source: ONS

3.47

We have modelled three alternative scenarios for market signals uplifts across the country, with outcomes as follows:

- 1 Each district with an affordability ratio above the national ratio makes a market signals uplift in proportion to its difference with the national figure – this would see Guildford would address 0.6% or 209 dpa equivalent to a **36%** uplift on the addendum demographic-led need of 577 dpa;
- 2 Each district with an affordability ratio above the national ratio makes a market signals uplift in proportion to its difference with the national figure (weighted 50%) and its projected household growth (weighted 50%) – this would see Guildford address 134 dpa, equivalent to a **23%** uplift; and
- 3 Every district (whether above or below the national ratio) makes a market signals uplift in proportion to its difference with the lowest affordability ratio, Copeland at 2.6, (weighted 50%) and its projected household growth (weighted 50%) – this would see Guildford address 115 dpa, equivalent to a **20%** uplift.

3.48

Given a) is simply weighted by the affordability ratio, and takes no account of the baseline scale of growth anticipated in the district, it is considered that using the approach indicated at b) and c) would better reflect the scale of uplift that, when adopted in LPAs across the country, could provide sufficient housing to hold the affordability ratio steady in each location. This would suggest an uplift of between **20%** and **36%** for Guildford.

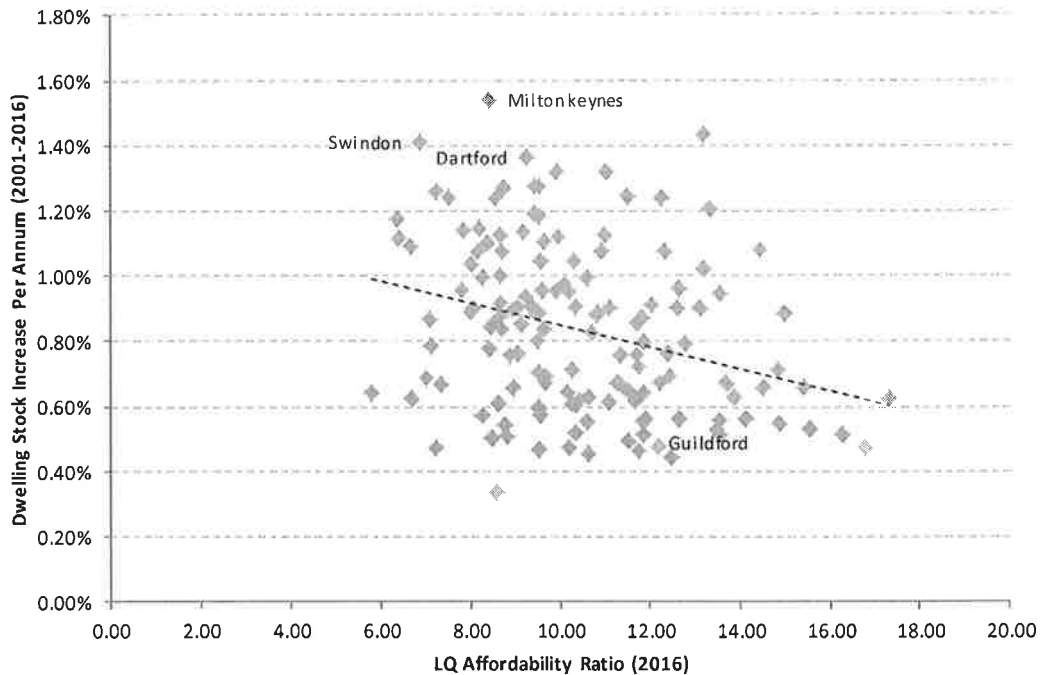
3. Benchmarking stock increases

3.49

Guildford has historically delivered very modest growth in its stock of homes in comparison to other authorities in the South and East of England. It is notable that Guildford, with completions at around 0.48% of stock annually over the period 2001-2016, is below the majority of other areas. Even at the proposed housing requirement, of 654 dwellings per annum, this

would reflect growth of c.1.04% per annum, below what many other areas have achieved, even during a period including recession.

Figure 2 Dwelling Stock Increases by Affordability in LPAs in South West, South East and East of England



Source: Dwelling Stock Increases from CLG Live Table 125, LQ Affordability Ratio from ONS Affordability Ratio series

- 3.50 As illustrated in Figure 2, areas including, Milton Keynes, Swindon and Dartford have all delivered new housing at a rate of up to 1.5% of stock per annum (and in some cases, more if looking at the period pre-recession), and see generally lower affordability ratios. On a comparative basis, this analysis demonstrates that, all else being equal, a greater growth rate in housing stock could help to moderate affordability pressures (albeit clearly it is not the only factor).
- 3.51 If Guildford were to increase rates of delivery to 1.2%-1.4% of stock per annum, as seen in numerous locations elsewhere, this would be equivalent to a delivery rate of 767-912 (against a 2016 dwelling stock of 57,640 as per CLG Live Table 125). At the lower end this represents an uplift of **33%** on the addendum's demographic-led needs of 577 dpa and could be seen to be a level of stock increase which could reasonably be expected to moderate increases in affordability to levels seen in those more affordable comparator locations where housing stock has been growing at such a rate.

4. Benchmarking market signal uplifts elsewhere

- 3.52 As set out in Lichfields' previous review, it is considered that benchmarking Guildford against market signal uplifts applied elsewhere in the Country is a relevant and helpful indicator of the scale of market signals uplift considered reasonable against the PPG. At **Appendix 3** we set out a table of where Market Signal uplifts are being applied either through current SHMAs or in Inspector's findings on Local Plans. Whilst the position is varied, it does on a general basis confirm two principles:

- 1 that such percentage rate adjustments are being applied in numerous authorities across the Country reflecting the guidance in the PPG; and
- 2 that broadly the more acute the affordability problem (as indicated by the affordability ratio) the greater the adjustment that SHMA consultants, Councils and Inspectors are applying.

3.53

A linear extrapolation of these uplifts suggests that a 20% uplift would be applicable in Guildford, albeit areas with affordability pressures similar to that in Guildford have seen uplifts of up to 30% applied (for example in Cambridge). In Guildford, a **20%** uplift on the demographic-led needs of 577 dpa would equate to 692 dpa, while a **30%** uplift would equate to 750 dpa. This would fit appropriately with how uplifts are being applied elsewhere in the country.

Bringing the market signals evidence together

3.54

Bringing the range of techniques and evidence together, Table 3 illustrates the range of potential 'market signals' applicable based on national and locally specific evidence. The median estimate of uplift across all the approaches is 35%, and across the local-based approaches the minimum level of uplift amounts to 20%. However it is clear that a higher uplift (equivalent to a 1.2% growth rate) could reasonably be expected to occur based on growth seen elsewhere across the wider region in the last 15 years.

Table 3 Synthesis of Market Signals Analysis

Approach/Source	Uplift & Guildford Supply Figure	
	Uplift to baseline 577 dpa (%)	Implied supply (dpa)
National Based		
Barker Review increase on households	20.9%	698
NHPAU Supply Range	25.6%	725
Bramley & Watkins	25.0%	721
House of Lords Select Committee	39.5%	805
Redfern Review	44.2%	832
Local Based		
OBR-based affordability modelling	~	873
Weighted apportionment of national uplift	20%-36%	692-785
Benchmarking stock increases (1.2% p.a.)	33%	767
Benchmarking stock increases (1.4% p.a.)	58%	912
Benchmarking market signal uplifts	20-30%	692-750

3.55

Based on the above, it is our judgement and conclusion that the uplift for market signals is fully justified at a level c.20-30% above the baseline of 577 dpa (as indicated through the local-based methods) which would bring supply up to a level of between **circa. 700 and 750 dpa.** A figure at the upper end of this range would be commensurate to the District seeing a growth rate of just below 1.2% per annum, which is a rate of growth a number of areas across the wider south of England (which are also more affordable than Guildford) have seen consistently over

the last 15 years. As such it is considered to be of a scale which could reasonably be expected to occur.

- 3.56 In this context it is also worth noting that in evidence to the Waverley Local Plan examination on behalf of the Local Planning Authority, GL Hearn, the authors of the SHMA and the Guildford Addendum, have presented a calculation which does apply a 20% uplift for market signals across the HMA.⁸ They have done so with the purpose of illustrating how reasonable the OAN, and particularly scale of uplift, in Waverley is given the newer 2014-based projections, but in doing so similarly illustrate how unreasonable the OAN and scale of market signals uplift in Guildford now is.

Affordable housing needs

- 3.57 In line with the NPPF (para 47, 159), Local Planning Authorities should;
- “...use their evidence based to ensure their Local Plan meets the full, objectively assessed needs for market and affordable housing...”*
- “Local Planning Authorities should...prepare a SHMA which...addresses the need for all types of housing, including affordable.”*
- 3.58 The PPG sets out an approach to identifying affordable housing needs (ID 2a-022 to ID 2a-029), and states that total affordable housing need should be;
- “...considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments...an increase in the total housing figures included in the plan should be considered where it could help deliver the required number of affordable homes.”*
- 3.59 The incorporation of affordable housing needs has been further clarified in a number of relevant judgments which have been set out above.
- Households moving*
- 3.60 The addendum seeks to downplay the need for affordable housing (at para 5.40) by reference to moving households not generating needs for net additional dwellings stating *“...arising from not just newly arising but existing households, who if they moved would release a property for another household.”* A similar conclusion is reached within the SHMA at para 6.75.
- 3.61 However, this fails to reflect the approach set out in the PPG and what the consideration of affordable housing needs seeks to achieve. Households who are currently within a market dwelling, but are in need of an affordable dwelling because they cannot afford to meet their needs within the market, still require an affordable dwelling to be provided in order to be able to move tenure. They will only release that house back onto the market if, and only if, their affordable housing needs are met. There is still a net additional requirement for an affordable dwelling (despite there not necessarily being a net additional household). If the purpose of the OAN methodology within the PPG was to simply limit the OAN to the demographics-led need or the number of households (irrespective of what tenure of house they may require) it would not include the requirement to assess and address full affordable housing needs within the OAN.

⁸ http://www.waverley.gov.uk/download/downloads/id/5722/wbc-lp1-4a_appendix_1_-_g_l_hearn_statementpdf.pdf - para 2.32

Incorporating affordable needs into OAHN

- 3.62 The SHMA and addendum both identify a significant need for affordable housing in Guildford, amounting to 455 affordable homes per annum in the SHMA and 517 per annum in the addendum. These levels of affordable housing would require between 1,138 and 1,293 dwellings per annum in total to deliver, respectively. The assessed affordable housing need is calculated through analysis of backlog of current need and future household expected to fall into need, less future affordable housing supply (i.e. through re-lets). The steps for its calculation are set out in PPG ID 2a-022 to 2a-029 and differ to that of OAN, but it nonetheless represents a key element within the calculation.
- 3.63 The identified need for affordable housing in Guildford would clearly require total housing delivery well in excess of the starting point or the economic-led needs and in total might be a level which could be unrealistic. However, as established in Kings Lynn the scale of affordable housing needs provides a ‘*strong influence*’ for increasing overall housing needs. The question therefore is what scale of uplift can be delivered to help meet more of the affordable housing need before the proposed level becomes unrealistic. The addendum considers that the demographic-led need of 552-577 dpa already represents a boost to housing supply, and that any uplift would be limited to that suggested by increases in household formation. However, this should be seen in the context of particularly low housing delivery in Guildford in recent years (despite market signals pointing to an ever-increasing demand for housing in the Borough).
- 3.64 Lichfields affordability analysis above shows that Guildford has delivered over the last 15 years a rate of housing growth of less than half of other areas in the wider south of England such as Swindon, Milton Keynes and Dartford which have persistently delivered at c.1.2% or more over the same period. At a national level, housing growth of between 1.0-1.3% per annum is needed in the future to meet national targets of between 250,000-300,000 homes per annum, albeit this rate of growth will inevitably vary across the country (with some areas providing growth higher than the national average and some lower) depending on local factors including affordability pressures.
- 3.65 On this basis, a rate of growth of c.1.2% per annum is completely reasonable to expect for Guildford particularly given the demand for housing evidenced by the worsening affordability. This would imply delivery of c.750 dpa and would make a significant contribution to the need for affordable housing in the District.
- 3.66 The SHMA and addendum both make an adjustment for headship rates (and effectively no adjustment for market signals), yet consider the overall uplift encompasses the needs for affordable housing. By further conflating affordable housing needs within the overall uplift, neither the SHMA nor the addendum make a sufficient uplift to address headship rates, market signals and/or affordable housing needs either separately or combined. The Waverley Local Plan Inspector has already established that the approach (of adjusting household formation rates) in the West Surrey SHMA was insufficient to address market signals – how this can therefore be sufficient to address both market signals and the substantial need for affordable housing is therefore seriously questionable.

The increase in affordable housing needs – SHMA and addendum

- 3.67 The addendum found that affordable housing needs had increased since the SHMA, yet reduced the OAN for Guildford. This is illogical, incorrect and contrary to caselaw as established in *King’s Lynn*. The SHMA authors clearly felt previously in the SHMA that delivery of c.700dpa could ‘*reasonably be expected to occur*’ and the addendum still shows job growth of 0.9% p.a.

(similar to the SHMA) could still occur based on the updated forecasts (see para 4.5 of the addendum). In context of seeking to boost housing supply and properly address affordable housing needs, there is no logical rationale to reduce the OAN from the previous conclusion when the affordable housing needs are increasing.

- 3.68 Furthermore, as shown above, delivery even in excess of the SHMA's higher conclusion (of 693 dpa) could also be expected to occur, hence there is clearly scope to make a further uplift for affordable housing to a level of delivery which remains reasonable. This uplift is further bolstered by the response needed to market signals – as established by the Waverley Plan Inspector the headship rate approach is insufficient, and Lichfields has demonstrated that a range of circa.700-750 dpa could reasonably be expected improve affordability, whilst being of a scale which could be expected to occur.

Student growth adjustment

- 3.69 The SHMA made an adjustment for student growth in Guildford of 25 dpa, and the addendum makes an adjustment of 23 dpa. Whilst this figure is not disputed, we note that this should be added on to the figure of OAHN as a last stage, since it represents a separate and independent element of OAHN (separate to, for example, adjustments for market signals of for employment-led needs) related particularly to growth in student numbers not captured elsewhere in the assessment.
- 3.70 Based on the identified range above of c.700-750 dpa which would be a reasonable and realistic response to market signals, the additional need for housing to accommodate student growth would bring the total level of need to between c.725-775 dpa.

Summary of SHMA and Addendum

- 3.71 The updating of the addendum for Guildford only creates inconsistency in approach within the housing market area, particularly as areas rely upon studies which use different data sources. In particular the addendum has used different household projections in Guildford and different job growth forecasts without regard to the impact these will have on housing needs in the rest of the West Surrey HMA. It has not been demonstrated in the addendum that adopting a lower job growth forecast (and OAN) in Guildford will not have an impact on the need for housing elsewhere in the HMA which itself is a fundamental flaw within the overall approach to assessing need in Guildford.
- 3.72 Notwithstanding the above, we note a number of issues related to the approach taken to assessing needs in both the SHMA and addendum. They have likely under-estimated population growth by not having regard to the impact of London (despite acknowledging this issues by way of sensitivity in the SHMA). They also fail to make a sufficient uplift for market signals by making an adjustment to address household formation rates – the Waverley Local Plan Inspector has already indicated that this approach is insufficient given the affordability pressures that exist, and Lichfields analysis demonstrates that a) a greater uplift than proposed in either the SHMA or addendum is needed to improve (or moderate) affordability in Guildford; and b) an OAN in excess of that concluded in the SHMA or addendum is realistic and could reasonably be expected to occur. On the basis of our analysis we conclude that a figure of c.700-750 dpa represents a sufficient yet realistic response to market signals. It also demonstrates that neither the SHMA nor addendum have addressed affordable housing needs (which have gone up) as far as possible within the realms of a realistic rate of housing delivery, not reflecting *Kings Lynn*.

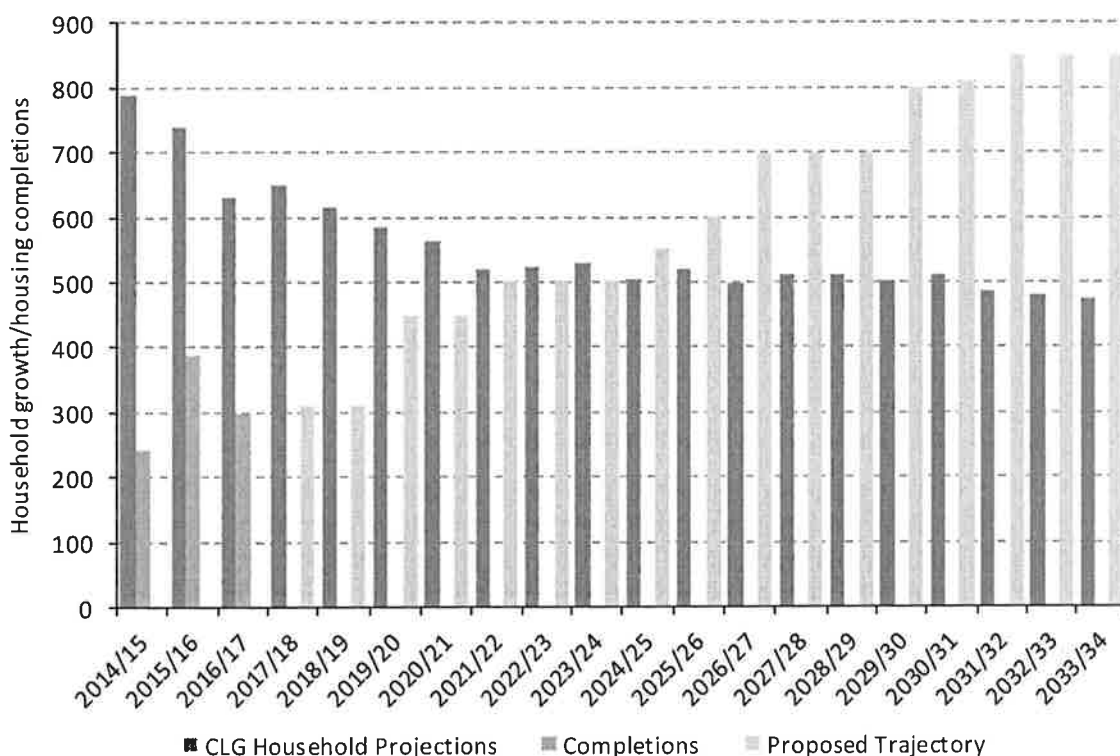
3.73 Taking into account the need for additional student accommodation, Lichfields conclude that the full OAN for Guildford amounts to c.725-775 dwellings per annum over the period 2015-34.

4.0 Trajectory of needs

4.1 Guildford's Emerging Plan proposes a stepped housing trajectory/target, with provision increasing from 450 per annum in 2019/20 to 850 per annum by 2031/32. The SHMA and addendum, understandably, only present their findings on needs across the whole assessment period (rather than broken down on a year-by-year basis). The scenarios appear to be presented as annual averages across all scenarios, with inference from the SHMA being that needs arise fairly evenly across the assessment period.

4.2 Looking in more depth at the household projections however, it would suggest that in fact a higher proportion of the need is arising earlier in the projection period, as shown in Figure 3. Household growth in the earlier years of the plan is above 700 per annum, falling to just below 500 per annum by 2034. On this basis, if needs were delivered at a constant rate over the plan period this would likely lead to unmet need in the immediate future – this will be even worse if need below the annual average is provided in the earlier years and not made up until late than the plan period (as proposed in the Emerging Plan, and shown below).

Figure 3 Annual projected household growth from 2014-based CLG projections, Completions (2014-16) and proposed stepped target



Source: 2014-based household projections, Guildford AMR, Guildford Proposed Submission Local Plan June 2017 Policy S2, Housing Trajectory Background Paper. Figures from 2018/19 and 2019/20 taken from Housing Trajectory Background Paper. Figures from 2020/21 onwards are taken from Local plan Policy S2.

- 4.3 In addition, many of the components of the OAN calculation, including the market signals and elements in the affordable housing need calculation, relate to 'backlog' or past undersupply which has generated pent-up need and demand. This logically has manifest itself now, and further illustrates that the need for new homes is likely to be skewed towards the early part of the period. The lack of completions relative to household growth in the last 2 years has likely contributed to worsening affordability seen in the same period, further demonstrating the current pressure on housing delivery in the Borough to make up for this.
- 4.4 In this context, any housing trajectory or policy approach in the plan which back-loads housing delivery, will have significant negative effects by delaying the meeting of households' housing needs, which arises throughout the period and especially in the early part of the assessment period (particularly as delivery has already been lower than need). All of the evidence shows that the stepped trajectory proposed in the Emerging Plan is unjustified based on the scale of projected household growth, market signals and backlog of affordable housing, and such an approach would only seek to worsen outcomes in the early years of the plan period.

5.0 Unmet housing needs

- 5.1 The NPPF sets out (para 47) that Local Planning Authorities should "use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area" (our emphasis). This is amplified in the plan-making tests of soundness within the NPPF (para 182) which identifies "*the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities...*" The starting point for considering the housing needs to be met in Guildford, must therefore be the level at which the full OAN for the housing market area would be met. This is also lent weight through recent judgments in the courts, including *St Modwen vs SoS CLG and East Riding of Yorkshire Council*⁹ which sets out (para 77): "*The aim is to assess housing needs fully and objectively, and the needs are those of the market area and not those of the district council's area. The NPPF would read very differently if "housing market areas" was another phrase for planning authority areas, as it could so easily have said had that been intended.*"
- 5.2 The SHMA (which currently represents the most up-to-date position on needs across the HMA, notwithstanding our criticisms of it) identifies OAN for the HMA of 1,729 dpa. For the reasons set out above we consider this is an underestimate and not the product of a robust assessment in line with the requirements of the NPPF and PPG.
- 5.3 Notwithstanding, and noting that Guildford is seeking reduce its OAN to 654dpa (from 693dpa) through the addendum, there remains a significant element of unmet need within the HMA within Woking. Woking's adopted Core Strategy plans for 292dpa to 2027, against an OAN within the SHMA of 517 dpa (an unmet need of 225 dpa or 3,150 homes total over the 14 years which the respective plan periods overlap for; 2013-2033 for Waverley and to 2027 for Woking). This figure is acknowledged by Guildford Borough Council in its Duty to Co-operate Topic Paper (June 2017).
- 5.4 The Council's Duty to Co-operate Topic Paper also states that;

⁹ *St Modwen Developments Ltd vs (1) Secretary of State for Communities and Local Government and (2) East Riding of Yorkshire Council* [2016] EWHC 968 (Admin) - CO/3653/2015

“Pursuant to the MoU, the three authorities have also agreed a Statement of Common Ground on housing delivery (Appendix 5). This recognises that there is unmet need within the HMA and commits the three authorities to continued future joint working to ensure that as far as possible, and subject to the policies in the NPPF, housing needs across the HMA are met in full...”

As set out previously, we do not consider that we can sustainably accommodate any unmet need arising from Woking, nor have we been formally asked to do so. Instead we recognise that this will require ongoing cooperation...” (para 4.49-50).

- 5.5 Guildford will need to have regard to the outcomes of the Waverley Local Plan Part 1 Examination and the emerging Woking Site Allocations DPD and to address any unmet need which remains within the HMA.

6.0 Conclusions

- 6.1 Neither the SHMA nor addendum represents full and robust objective assessments of need for neither the West Surrey HMA nor Guildford itself. Lichfields’ view is that **full, objectively assessed need for Guildford, amounts to circa. 725-775 dwellings per annum, of which 750 dpa represents an appropriate mid-point. This** includes the need for student accommodation (which amounts to c.25 dpa). The flaws within the SHMA and addendum are summarised as follows:

- 1 As a preliminary point, it is flawed that Guildford alone has sought to update its evidence base by way of a SHMA addendum which draws upon different assumptions (around household and job growth) to the SHMA which covered the rest of the HMA. The addendum does not demonstrate that there will be no impact on the other parts of the HMA;
- 2 Notwithstanding, we note a number of issues with the approach taken in the SHMA and addendum, including;
 - a The under-estimation of future population growth by failing to account for the impact of additional growth from London. The SHMA recognises this issue by way of sensitivity analysis, but it is ultimately omitted from OAN in both the SHMA and addendum;
 - b The Waverley Local Plan Inspector has already established that adjusting household formation rates is insufficient and that no evidence is set out in the SHMA which shows that this uplift would improve affordability. Lichfields’ analysis demonstrates a range of local methods to determine what could reasonably be expected to improve affordability, which would bring need to c.20-30% above the starting point of 577 dpa, to c.700—750 dpa;
 - c The addendum has adopted updated forecasts of job growth for Guildford, but has provided no evidence to show that adopting these would not have an impact on the rest of the HMA. It is possible that more recent forecasts for the HMA may indicate similar overall job growth to that in the SHMA, creating unmet need; and
 - d The uplift for affordable housing needs has already been deemed insufficient to address affordability (by the Waverley Local Plan Inspector). Further, despite the addendum showing an increase in affordable housing needs the OAN for Guildford has gone down – evidently affordable housing needs have not had the ‘strong influence’ on OAN as clarified in Kings Lynn. Delivery in excess of 654 dpa (as concluded in the addendum)

is clearly a reasonable prospect for the District in light of the OAN concluded in the SHMA (of 693 dpa).

- 6.2 The stepped trajectory proposed within the plan is unjustified given that household growth in Guildford is skewed toward the earlier end of the plan period; suppressing delivery in the earlier years would only create unmet needs in the short-medium term as households' needs are not met and pushed further into the plan period. The immediate need for housing is also evident from worsening affordability and the backlog of need for affordable housing, which would lead to further worsening outcomes as a result of the stepped trajectory.
- 6.3 Guildford will need to monitor the outcomes of emerging plans within its HMA in order to address any unmet needs which are not addressed through these processes. This is imperative in meeting para 47 of the NPPF which is clear that local planning authorities should ensure their Local Plans meet the full objectively assessed need in the housing market area.

Appendices

Appendix 1: The evidential basis for a market signals uplift to improve affordability

Appendix 2: ONS lower quartile affordability ratio data

Appendix 3: OBR based affordability forecasting for Guildford

Appendix 4: Market signals uplifts applied in other locations

Appendix 1: The evidential basis for a market signals uplift to improve affordability

Barker Review

- 1 The Barker Review of Housing Supply¹⁰ was a seminal report that continues to influence government policy. Published in 2004 and using a baseline figure of 140,000 private sector dwelling starts in 2002-03, the report concluded that to reduce the long term price trend from 2.7% per annum seen prior to 2004, to the 1.1% per annum seen as an average across the EU, would require an increase of 120,000 additional private homes per annum, totalling 260,000 per annum to 2026, alongside an increased provision of social sector housing. The Barker Review concluded that such a level would be necessary for “improving the housing market” and ensure that “affordability is increasingly improved over time” (paras 1.39 and 1.40).
- 2 In making such a recommendation, the Review acknowledged that this was in excess of projected rates of household formation (at that point estimated at 179,000 per annum). Even today, with household projections in England at around 210,000 households per annum¹¹ and equating to around 215,000 dwellings per annum (incorporating a notional 2.5% vacancy rate), the 260,000 dwellings per annum concluded within the Barker Review as necessary to increasingly improve affordability would represent a national average uplift of **20.9%** above the demographic projection.
- 3 Flowing from the Barker Review, Government commissioned the development of an Affordability model by Reading University, designed to relate affordability to housing supply in the medium to long term. The key findings from the 2007 version of the model was that the elasticity of house prices with respect to housing stock is found to be relatively high, at -2.0 i.e. a 1% increase in stock at the regional level leads to a 2% fall in house prices, everything else being equal (RD20, page 32). This has informed much subsequent work by Government.

National Housing & Planning Advice Unit (NHPAU)

- 4 The NHPAU was founded by Government as a direct response to the recommendations of the Barker Review. In October 2007, it published work entitled ‘Developing a target range for the supply of new homes across England’¹² flowing from analytical modelling (using the Reading University model) on the impact of the Government’s housing supply target for housing affordability prospects over the medium and long-term. Its conclusion was that a supply range from a minimum of 240,000 dpa (the Government’s annual target at that point) and a high 280,000 dpa should be tested (Table 18), going on to identify (para 4.68):
“NHPAU believes that there is a realistic possibility of stabilising the affordability of market housing over the long-term if a supply target for 270,000 net additions to stock, in

¹⁰ ‘Review of Housing Supply, Delivering Stability: Securing our Future Housing Needs’ (March 2004), Kate Barker - http://news.bbc.co.uk/nol/shared/bsp/hi/pdfs/17_03_04_barker_review.pdf

¹¹ CLG 2014-based household projections, which at the national level represent the same level of annual growth projected in the earlier 2012-based household projections.

¹² ‘Developing a target range for the supply of new homes across England’ (October 2007), NHPAU - <http://webarchive.nationalarchives.gov.uk/20120919132719/http://www.communities.gov.uk/documents/housing/pdf/523984.pdf>

the right place and of the right type can be adopted through the planning system for delivery before or by 2016.”

- 5 At 270,000 dwellings per annum, this would represent a national average **25.6%** uplift above the bare demographic projection of the 2014-based household projections.
- 6 Crucially, the NHPAU concluded that if stabilising affordability in each region is the goal, then the most efficient way to achieve that is to proportionately increase supply in the areas where affordability is most severe. Thus it focussed 80% of its uplifts (over the then RSS targets) across the South East, the South West and the East of England.

Bramley & Watkins

- 7 Academic research by Bramley & Watkins¹³ has looked at the potential for modelling housing markets at a local level to inform planning decisions. One aspect it considers is affordability impacts of supply changes at the sub-regional level. It includes modelled scenarios that conclude “very high” increases in supply (over other elements within the model) across the South East, defined as 35%, can deliver notable improvements to affordability, including some improvement to affordability in London. This implies that high uplifts just short of **35%**, such as around **25%** in high value areas surrounding London, would be sufficient to address affordability at a local level (i.e. without spill-over benefits to surrounding areas).
- 8 Interestingly, this methodological approach is applied by Bramley to a review of the Bristol Area SHMA for Business West¹⁴. It concludes that an uplift of 50-60% is appropriate compared to 7.5% suggested by the SHMA.

House of Lords Select Committee on Economic Affairs

- 9 In July 2016, the House of Lords Select Committee on Economic Affairs published their report ‘Building More Homes’¹⁵ which was the output of the House of Lords’ inquiry into the housing market. It reflects on past failure to build sufficient numbers of homes, highlighting how supply has substantially undershot the recommended amounts within the Barker Review. It also draws upon evidence provided to the inquiry by HM Treasury (HMT) which indicated (para 81) that *“The modelling suggests that in order to keep the house prices to earnings ratio constant, somewhere between 250,000 and 300,000 homes per year need to be built.”* albeit the report goes on to note (footnote 91) that *“Due to low interest rates building 250,000–300,000 homes above may now be insufficient to keep the price: earnings ratio constant”*
- 10 Ultimately based on the evidence brought to the inquiry, the select committee concluded that:

¹³ ‘Housebuilding, demographic change and affordability as outcomes of local planning decisions; exploring interactions using a sub-regional model of housing markets in England’ (2 October 2014) Bramley & Watkins, Heriott Watt University (Published in Progress in Planning 2015) - [https://pureapps2.hw.ac.uk/portal/en/publications/housebuilding-demographic-change-and-affordability-as-outcomes-of-local-planning-decisions\(23dfd394-4dc7-406d-ad05-3ee18fdd8497\).html](https://pureapps2.hw.ac.uk/portal/en/publications/housebuilding-demographic-change-and-affordability-as-outcomes-of-local-planning-decisions(23dfd394-4dc7-406d-ad05-3ee18fdd8497).html)

¹⁴ Business West: Wider Bristol Housing Market Area Strategic Housing Assessment 2015: Commentary by Bramley <http://initiativewest.co.uk/content/uploads/2015/12/Final-Bramley-WoE-SHMA-critique-30Nov2015.pdf>

¹⁵ ‘Building more homes’ 1st Report of Session 2016–17 (15 July 2016) House of Lords Select Committee on Economic Affairs (HL Paper 20) - <http://www.publications.parliament.uk/pa/ld201617/ldselect/ldeconaf/20/20.pdf>

“To address the housing crisis at least 300,000 new homes are needed annually for the foreseeable future.”

- 11 At 300,000 dwellings per annum, this represents a **39.5%** uplift on the 2014-based household projection equivalent, and although at the upper end of the range identified by HMT, the qualification within the report suggests it would be the figure necessary to keep the affordability ratio constant.

Redfern Review

- 12 The Redfern Review¹⁶ was an independent review of the causes of falling home ownership, and associated housing market challenges. Published in November 2016, it was informed by a housing market model and built by Oxford Economics which looked at the impacts of different supply assumptions on prices and home ownership. The review ultimately concludes (para 33):

“...looking forward, if the number of households in the UK were to grow at around 200,000 per year, new supply of 300,000 dwellings per year over a decade would be expected to cut house price inflation by around 5 percentage points (0.5 percentage points a year)... In other words boosting housing supply will have a material impact on house prices, but only if sustained over a long period.”

- 6.4 The accompanying report by Oxford Economics¹⁷ identifies that *“To put downward pressure on prices new supply would need to outstrip underlying household formation”*. It actually models a boost in housing supply of 100,000 above their baseline forecast of 210,000 dwellings per annum, concluding that 310,000 dpa *“helps to keep prices in check”* up to 2026, albeit still rising marginally. Although no corresponding analysis is presented on the affordability ratio (i.e. accounting for changes in income over that period), the adoption of 310,000 dpa as a figure to keep prices in check would represent a **44.2%** uplift over the demographic baseline suggested by the 2014-based projections. A lower percentage would be sufficient to hold affordability constant if household incomes increased in a corresponding manner.

¹⁶ ‘The Redfern Review into the decline of home ownership’ (16 November 2016) - http://www.redfernreview.org/wp-content/uploads/2016/01/TW082_RR_online_PDF.pdf

¹⁷ ‘Forecasting UK house prices and home ownership’ (November 2016) Oxford Economics - <http://www.redfernreview.org/wp-content/uploads/2016/11/20161114-Redfern-Review-modelling-paper.pdf>

Appendix 2: ONS lower quartile affordability ratio data

In 2016, Government moved responsibility for the relevant datasets on the lower quartile affordability ratio from CLG to ONS.

CLG had used a ratio of lower quartile earnings (work-place based) to lower quartile house prices (based on CLG derived land registry data) to present this. This data series is used and referenced in both the West Surrey SHMA (2014) and the previous Lichfields review report and has formed the basis of considering affordability for Guildford in the Local Plan evidence.

ONS now present two lower quartile data-sets, neither of which are directly comparable with the previous CLG data (due to a different sub-set of land registry house price data used), but both of which provide a back-series:

- 1 Ratio of lower quartile earnings (work-place based, i.e. of jobs based in the area) to lower quartile house prices (ONS house price statistics derived from land registry); and
- 2 Ratio of lower quartile earnings (residence based, i.e. of people living in the area) to lower quartile house prices (ONS house price statistics derived from land registry).

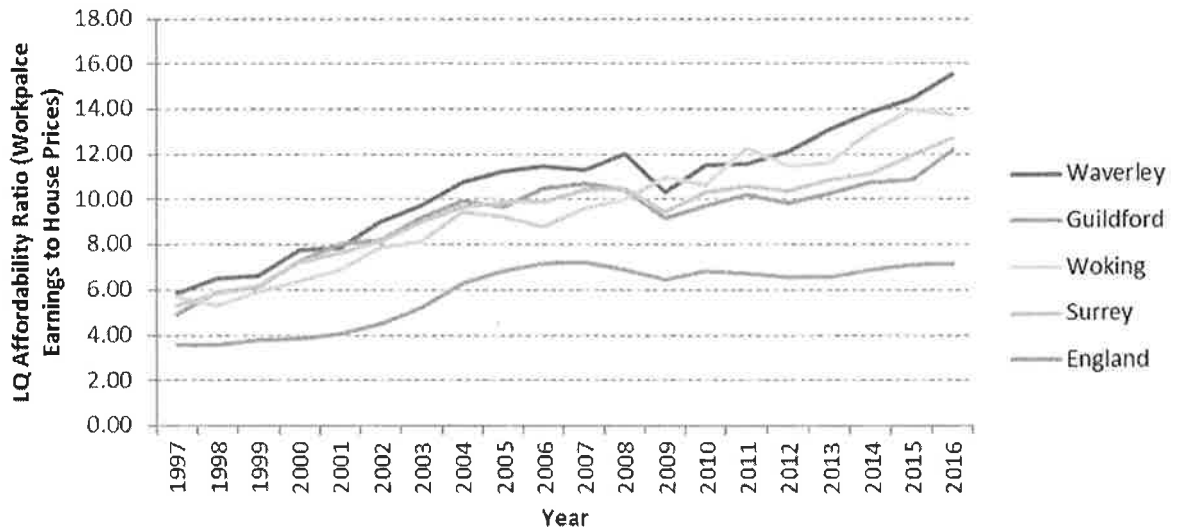
These were most recently updated on 17 March 2017 providing data for 2016 set out as follows for Guildford, the other HMA authorities, Surrey and England.

Table 4 Lower Quartile Affordability Ratio - Workplace Based Earnings

	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Waverley	5.85	6.53	6.60	7.76	7.86	9.04	9.70	10.76	11.27	11.48	11.32	12.00	10.32	11.51	11.58	12.14	13.11	13.89	14.46	15.54
Guildford	4.92	5.92	6.13	7.25	8.04	8.18	9.16	9.92	9.69	10.50	10.71	10.46	9.18	9.74	10.19	9.86	10.28	10.78	10.86	12.18
Woking	5.67	5.33	5.89	6.39	6.91	7.87	8.15	9.47	9.25	8.78	9.59	9.98	10.99	10.64	12.31	11.48	11.64	13.02	13.99	13.73
Surrey	5.29	5.85	6.19	7.20	7.68	8.12	9.04	9.67	9.87	9.91	10.44	10.47	9.43	10.34	10.57	10.36	10.89	11.14	11.96	12.73
England	3.57	3.57	3.77	3.85	4.08	4.51	5.21	6.27	6.82	7.17	7.21	6.91	6.48	6.86	6.72	6.58	6.57	6.91	7.11	7.16

Source: ONS

Figure 42 Lower Quartile Affordability Ratio - Workplace Based Earnings



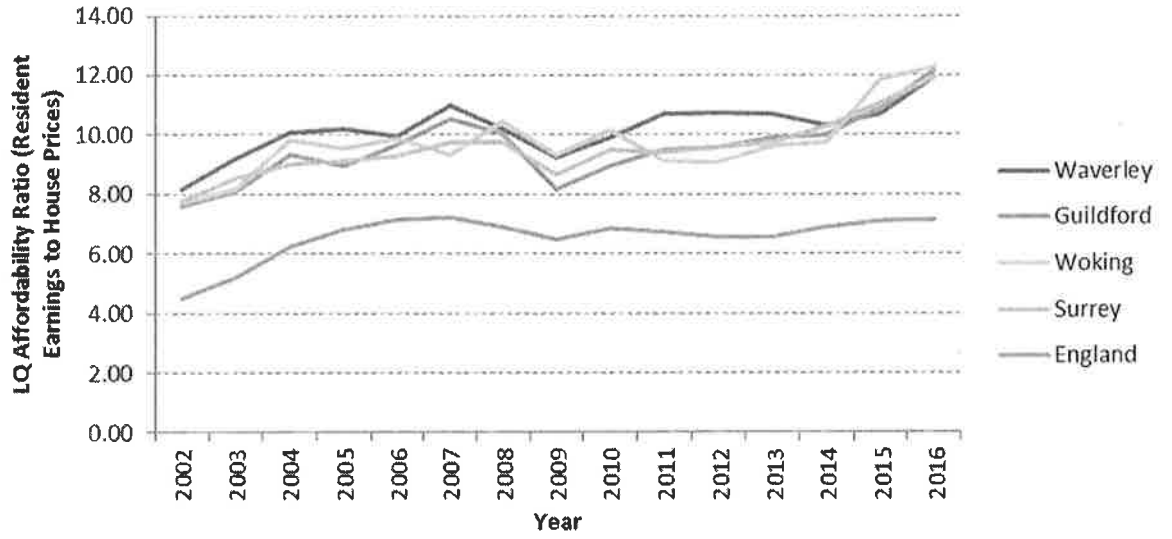
Source: ONS

Table 5 Lower Quartile Affordability Ratio - Residence Based Earnings

	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Waverley	8.17	9.21	10.08	10.22	9.96	10.97	10.22	9.26	9.92	10.71	10.75	10.69	10.33	10.70	11.93
Guildford	7.62	8.10	9.33	8.98	9.68	10.52	10.04	8.16	8.97	9.49	9.58	9.90	10.00	10.92	12.14
Woking	7.71	8.18	9.83	9.54	9.89	9.35	10.44	9.34	10.15	9.12	9.09	9.61	9.73	11.85	12.29
Surrey	7.75	8.56	9.02	9.13	9.30	9.73	9.73	8.66	9.50	9.42	9.58	9.75	10.30	11.09	11.96
England	4.51	5.20	6.25	6.81	7.16	7.21	6.91	6.48	6.86	6.72	6.58	6.57	6.91	7.11	7.16

Source: ONS

Figure 53 Lower Quartile Affordability Ratio - Residence Based Earnings



Source: ONS



Appendix 3: OBR based affordability forecasting for Guildford

OBR (2017 assumptions) - Current OAHN - 654 dpa 2015-34

Local Authority
 Inflation (1.00 if none)
 Earnings Rate of Increase (proportional) (Source: OBR)
 Housing Price Rate of Increase (proportional) (Source: OBR)

Completed
 1
 1,017
 1,048

Baseline

	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	Annual Average 2015-34
Lower Quartile House Prices (Source: ONS)	£12,500	£13,500	£17,500	£24,270	£39,695	£76,960	£395,054	£414,017	£433,889	£454,716	£476,542	£499,416	£521,388	£548,511	£574,840	£602,432	£631,349	£661,653	£693,413	£726,697	
No Houses	10.9	12.2	12.3	12.4	12.6	12.7	12.8	13.0	13.1	13.3	13.4	13.5	13.7	13.8	14.0	14.1	14.3	14.4	14.6	14.7	
Lower Quartile Affordability Ratio (Source: ONS)	0.15%	0.15%	0.15%	0.15%	0.15%	0.15%	0.15%	0.15%	0.15%	0.15%	0.15%	0.15%	0.15%	0.15%	0.15%	0.15%	0.15%	0.15%	0.15%	0.15%	
Lower Quartile Earnings (Implied from house prices/Affordability ratio)	£25,657	£26,606	£27,591	£28,611	£29,670	£30,768	£31,906	£33,087	£34,311	£35,580	£36,897	£38,262	£39,678	£41,146	£42,668	£44,247	£45,884	£47,582	£49,342		
Number of houses (assuming 1% p.a. increase)	57,252	57,640	58,216	58,799	59,387	59,980	60,580	61,186	61,798	62,416	63,040	63,670	64,307	64,950	65,600	66,256	66,918	67,587	68,263	68,946	
New Ratio	10.9	12.2	12.3	12.4	12.5	12.6	12.7	12.8	12.9	13.0	13.1	13.2	13.3	13.4	13.5	13.6	13.7	13.8	13.9	14.0	

Affordability under 654 dpa

	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	Annual Average 2015-34
Assuming increase in number of homes (p.a.)	388	669	669	669	669	669	669	669	669	669	669	669	669	669	669	669	669	669	669	669	669
No Houses	57,252	57,640	58,308	58,978	59,647	60,316	60,985	61,654	62,323	62,992	63,661	64,330	64,999	65,668	66,337	67,006	67,675	68,344	69,013	69,682	
Supply Change above underlying assumptions	0.15%	0.15%	0.15%	0.15%	0.15%	0.15%	0.15%	0.15%	0.15%	0.15%	0.15%	0.15%	0.15%	0.15%	0.15%	0.15%	0.15%	0.15%	0.15%	0.15%	
Price Change	-0.33%	-0.29%	-0.27%	-0.25%	-0.23%	-0.21%	-0.19%	-0.17%	-0.15%	-0.13%	-0.11%	-0.09%	-0.08%	-0.06%	-0.04%	-0.02%	0.00%	0.02%	0.05%	0.08%	
House Prices (accounting inflation, for Rate of increase and rate of	£12,500	£36,486	£36,486	£34,206	£35,667	£37,129	£38,591	£40,054	£41,516	£42,978	£44,440	£45,902	£47,364	£48,826	£50,288	£51,750	£53,212	£54,674	£56,136	£57,598	
New Ratio	10.9	12.2	12.3	12.4	12.5	12.6	12.7	12.8	12.9	13.0	13.1	13.2	13.3	13.4	13.5	13.6	13.7	13.8	13.9	14.0	

OBR (2017 assumptions) - Maintain affordability at 2016 level to 2022

Local Authority
 Inflation (1.00 if none)
 Earnings Rate of Increase (proportional) (Source: OBR)
 Housing Price Rate of Increase (proportional) (Source: OBR)

Completed
 1
 1,017
 1,048

Baseline

	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	Annual Average 2015-34
Lower Quartile House Prices (Source: ONS)	£12,500	£17,500	£17,500	£24,270	£39,695	£76,960	£395,054	£414,017	£433,889	£454,716	£476,542	£499,416	£521,388	£548,511	£574,840	£602,432	£631,349	£661,653	£693,413	£726,697	
No Houses	10.9	12.2	12.3	12.4	12.6	12.7	12.8	13.0	13.1	13.3	13.4	13.5	13.7	13.8	14.0	14.1	14.3	14.4	14.6	14.7	
Lower Quartile Affordability Ratio (Source: ONS)	0.15%	0.15%	0.15%	0.15%	0.15%	0.15%	0.15%	0.15%	0.15%	0.15%	0.15%	0.15%	0.15%	0.15%	0.15%	0.15%	0.15%	0.15%	0.15%	0.15%	
Lower Quartile Earnings (Implied from house prices/Affordability ratio)	£25,657	£26,606	£27,591	£28,611	£29,670	£30,768	£31,906	£33,087	£34,311	£35,580	£36,897	£38,262	£39,678	£41,146	£42,668	£44,247	£45,884	£47,582	£49,342		
Number of houses (assuming 1% p.a. increase)	57,252	57,640	58,216	58,799	59,387	59,980	60,580	61,186	61,798	62,416	63,040	63,670	64,307	64,950	65,600	66,256	66,918	67,587	68,263	68,946	
New Ratio	10.9	12.2	12.3	12.4	12.5	12.6	12.7	12.8	12.9	13.0	13.1	13.2	13.3	13.4	13.5	13.6	13.7	13.8	13.9	14.0	

Affordability under 673 dpa

	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	Annual Average 2015-34
Assuming increase in number of homes (p.a.)	388	900	900	900	900	900	900	900	900	900	900	900	900	900	900	900	900	900	900	900	873
No Houses	57,252	57,640	58,540	59,440	60,340	61,240	62,140	63,040	63,940	64,840	65,740	66,640	67,540	68,440	69,340	70,240	71,140	72,040	72,940	73,840	
Supply Change above underlying assumptions	0.56%	0.51%	0.47%	0.43%	0.39%	0.35%	0.31%	0.27%	0.23%	0.19%	0.15%	0.11%	0.07%	0.03%	0.00%	-0.04%	-0.08%	-0.12%	-0.16%	-0.20%	
Price Change	-1.12%	-1.07%	-1.02%	-0.97%	-0.92%	-0.87%	-0.82%	-0.77%	-0.72%	-0.67%	-0.62%	-0.57%	-0.52%	-0.47%	-0.42%	-0.37%	-0.32%	-0.27%	-0.22%	-0.17%	
House Prices (accounting inflation, for Rate of increase and rate of	£12,500	£33,991	£33,991	£31,650	£32,876	£34,102	£35,328	£36,554	£37,780	£39,006	£40,232	£41,458	£42,684	£43,910	£45,136	£46,362	£47,588	£48,814	£50,040	£51,266	
New Ratio	10.9	12.2	12.2	12.2	12.2	12.2	12.2	12.2	12.2	12.3	12.3	12.4	12.4	12.4	12.5	12.5	12.6	12.7	12.7	12.8	

OBR (2017 assumptions) – Maintain affordability at 2016 level to 2034

Local Authority
 Inflation (1.00% none)
 Earnings Rate of Increase (proportional) (Source: OBR)
 Housing Price Rate of Increase (proportional) (Source: OBR)

Baseline	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	
Lower Quartile House Prices (Source: ONS)	£112,500	£137,500	£143,220	£159,695	£176,560	£195,054	£214,017	£233,459	£253,388	£273,801	£294,706	£316,104	£338,004	£360,416	£383,341	£406,789	£430,771	£455,289	£480,344	£505,946	£532,104
Lower Quartile Affordability Ratio (Source: ONS)	10.9	12.2	12.3	12.4	12.6	12.7	12.8	13.0	13.1	13.3	13.4	13.5	13.7	13.8	14.0	14.1	14.3	14.4	14.6	14.8	15.1
Lower Quartile Earnings (Implied from house price/affordability ratio)	£25,657	£26,606	£27,591	£28,611	£29,670	£30,768	£31,905	£33,081	£34,297	£35,554	£36,852	£38,191	£39,571	£40,992	£42,454	£43,957	£45,501	£47,086	£48,712	£50,379	£52,087
Number of houses (assuming 1% p.a. increase)	57,252	57,640	58,216	58,799	59,387	59,980	60,580	61,186	61,798	62,416	63,040	63,670	64,307	64,950	65,600	66,256	66,918	67,587	68,263	68,946	69,636
			1.00%	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%

Affordability under 987 gpa

Completions - year beginning	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034
Accumulating increase in number of homes (p.a.)	389	1,020	1,020	1,020	1,020	1,020	1,020	1,020	1,020	1,020	1,020	1,020	1,020	1,020	1,020	1,020	1,020	1,020	1,020	1,020
No Houses	57,252	57,640	58,660	59,680	60,700	61,720	62,740	63,760	64,780	65,800	66,820	67,840	68,860	69,880	70,900	71,920	72,940	73,960	74,980	76,000
Supply Change above underlying assumptions		0.77%	0.74%	0.71%	0.68%	0.65%	0.63%	0.60%	0.57%	0.55%	0.53%	0.50%	0.48%	0.46%	0.44%	0.42%	0.40%	0.38%	0.36%	0.34%
Price Change		-1.54%	-1.48%	-1.42%	-1.36%	-1.31%	-1.25%	-1.20%	-1.15%	-1.10%	-1.05%	-1.01%	-0.96%	-0.92%	-0.88%	-0.84%	-0.80%	-0.76%	-0.72%	-0.68%
House Prices (accounting inflation, for rate of increase and rate of)	£112,500	£132,650	£133,411	£144,686	£156,540	£169,001	£182,095	£195,832	£210,214	£225,244	£240,924	£257,254	£274,234	£291,864	£309,144	£327,074	£345,654	£364,784	£384,464	£404,694
New Ratio	10.9	12.2	12.1	12.1	12.0	12.0	12.0	12.0	12.0	12.0	12.0	12.0	12.0	12.0	12.0	12.0	12.1	12.1	12.1	12.2

OBR (2017 assumptions) – Return affordability to 2015 Level

Local Authority
 Inflation (1.00% none)
 Earnings Rate of Increase (proportional) (Source: OBR)
 Housing Price Rate of Increase (proportional) (Source: OBR)

Baseline	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034
Lower Quartile House Prices (Source: ONS)	£112,500	£137,500	£143,220	£159,695	£176,560	£195,054	£214,017	£233,459	£253,388	£273,801	£294,706	£316,104	£338,004	£360,416	£383,341	£406,789	£430,771	£455,289	£480,344	£505,946
Lower Quartile Affordability Ratio (Source: ONS)	10.9	12.2	12.3	12.4	12.6	12.7	12.8	13.0	13.1	13.3	13.4	13.5	13.7	13.8	14.0	14.1	14.3	14.4	14.6	14.8
Lower Quartile Earnings (Implied from house price/affordability ratio)	£25,657	£26,606	£27,591	£28,611	£29,670	£30,768	£31,905	£33,081	£34,297	£35,554	£36,852	£38,191	£39,571	£40,992	£42,454	£43,957	£45,501	£47,086	£48,712	£50,379
Number of houses (assuming 1% p.a. increase)	57,252	57,640	58,216	58,799	59,387	59,980	60,580	61,186	61,798	62,416	63,040	63,670	64,307	64,950	65,600	66,256	66,918	67,587	68,263	68,946
			1.00%	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%

Affordability under 1124 gpa

Completions - year beginning	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034
Accumulating increase in number of homes (p.a.)	388	1,270	1,270	1,270	1,270	1,270	1,270	1,270	1,270	1,270	1,270	1,270	1,270	1,270	1,270	1,270	1,270	1,270	1,270	1,270
No Houses	57,252	57,640	58,910	60,180	61,450	62,720	63,990	65,260	66,530	67,800	69,070	70,340	71,610	72,880	74,150	75,420	76,690	77,960	79,230	80,500
Supply Change above underlying assumptions		1.26%	1.26%	1.16%	1.11%	1.07%	1.02%	0.98%	0.95%	0.91%	0.87%	0.84%	0.81%	0.77%	0.74%	0.71%	0.68%	0.66%	0.63%	0.60%
Price Change		-2.41%	-2.31%	-2.22%	-2.13%	-2.05%	-1.97%	-1.89%	-1.82%	-1.75%	-1.68%	-1.61%	-1.54%	-1.47%	-1.40%	-1.33%	-1.27%	-1.21%	-1.15%	-1.09%
House Prices (accounting inflation, for rate of increase and rate of)	£112,500	£116,979	£127,941	£136,400	£145,370	£154,869	£164,914	£175,525	£186,724	£198,533	£210,978	£224,084	£237,879	£252,294	£267,360	£283,016	£299,292	£316,218	£333,824	£352,140
New Ratio	10.9	12.2	12.0	11.9	11.8	11.6	11.5	11.4	11.3	11.2	11.1	11.1	11.0	11.0	11.0	11.0	10.9	10.9	10.9	10.9

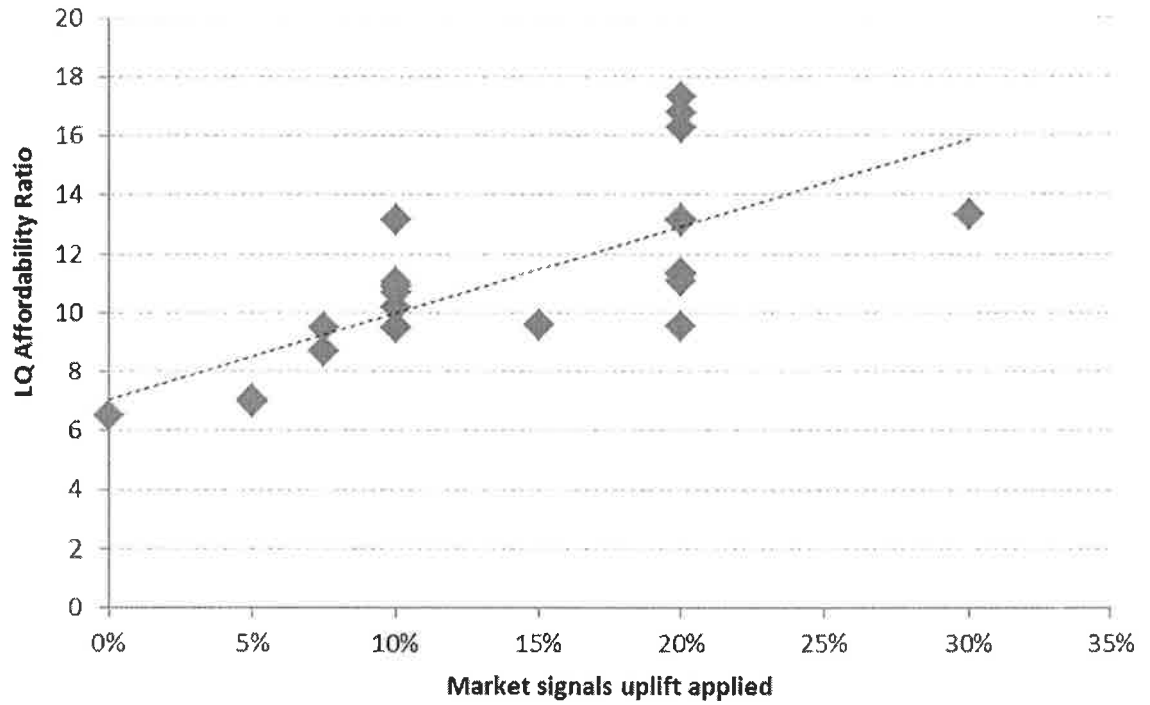
Appendix 4: Market signals uplifts applied in other locations

Table 6 Market signals uplifts applied in other locations

LPA	SHMA/Inspector's Report	Market Signals Uplift	LQ Affordability Ratio (2016)
Eastleigh	Inspector's Report	10%	10.18
Canterbury	SHMA & Inspector's Report	20%	11.1
Cambridge	SHMA	30%	13.32
South Cambridgeshire	SHMA	10%	11.03
High Peak	SHMA & Inspector's Report	5%	7.06
Braintree	SHMA	15%	9.58
Chelmsford	SHMA	20%	11.36
Sefton	Inspector's Report	0%	6.5
Uttlesford	Inspector's Report	10%	13.18
Aylesbury Vale	SHMA	10%	10.92
Chiltern	SHMA	20%	16.27
South Bucks	SHMA	20%	17.31
Wycombe	SHMA	20%	11.29
Uttlesford	SHMA	20%	13.18
East Herts	SHMA	20%	13.1
Harlow	SHMA	20%	9.55
Epping Forest	SHMA	20%	16.77
Stevenage	SHMA	10%	9.52
North Hertfordshire	SHMA	10%	10.69
Bristol	SHMA	7.50%	8.68
North Somerset	SHMA	7.50%	8.67
South Gloucestershire	SHMA	7.50%	9.51
Tamworth	Inspector's Report	5%	6.96
Mid Sussex	Inspector's Report	20%	13.17
Crawley	Inspector's Report	10%	9.52

Source: Lichfields (Note: only includes those where a flat rate uplift has been applied/concluded, rather than those where market signals uplift was not explicitly considered/applied or where an alternative approach – e.g. headship adjustments – were applied)

Figure 6 Market signals uplifts applied in other locations



Source: Lichfields



ANNEXE 2: Appeal decision dated 27th February 2018 for Guildford Station proposals (ref: APP/Y3615/W/16/3161412)



Appeal Decision

Inquiry Held on 7th-10th and 13th-15th November 2017

Site visits made on 6th, 7th, 8th, 9th, 10th, 13th, 14th & 15th November 2017.

by David L Morgan BA MA (T&CP) MA (Bld Con IoAAS) MRTPI IHBC

an Inspector appointed by the Secretary of State for Communities and Local Government

Decision date: 27 February 2018

Appeal Ref: APP/Y3615/W/16/3161412

Guildford Station and Car Park, Station Approach, Guildford, Surrey GU1 4UT

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
 - The appeal is made by Solum Regeneration against the decision of Guildford Borough Council.
 - The application Ref 14/P/02168, dated 26 November 2014, was refused by notice dated 30 June 2016.
 - The development proposed is a mixed use redevelopment comprising 438 residential dwellings (Class C3 use); 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); replacement station and office car parking, new residential car parking, cycle parking, a Station Plaza including new public realm with hard and soft landscaping, new access and servicing arrangements, plant and associated works.
-

This decision is issued in accordance with Section 56(2) of the Planning and Compulsory Purchase Act 2004 (as amended) and supersedes the decision issued on 22 January 2018.

Decision

1. The appeal is allowed and planning permission is granted for a mixed use redevelopment comprising 438 residential dwellings (Class C3 use); 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); replacement station and office car parking, new residential car parking, cycle parking, a Station Plaza including new public realm with hard and soft landscaping, new access and servicing arrangements, plant and associated works at Guildford Station and Car Park, Station Approach, Guildford, Surrey GU1 4UT in accordance with the terms of the application Ref 14/P/02168, dated 26 November 2014, subject to the conditions set out in the schedule at the end of this decision.

Procedural matters

2. The description of development used in the formal decision above is the amended version formally agreed by Guildford Borough Council (GBC) and subsequently set out in the Statement of Common Ground (SoCG).
3. A final version of the SoCG was submitted during the second week of the Inquiry. This formalised a range of issues set out in the former draft and, most importantly for the efficient running of the Inquiry, established that for the purposes of this appeal, the current position is that GBC are able to demonstrate a two year supply of housing land. The SoCG also clarified broad agreement on key aspects of the section 106 agreement, principally in relation to Affordable Housing (AH) mitigation for the effects of the development on the Thames Basin Heaths Special Protection Area (TBHSPA) and transport sustainability measures, thus overcoming the three related reasons for refusal set out in the decision notice, which are as a consequence, no longer defended.
4. In evidence GBC had maintained that the setting of St Nicolas Church, a Grade II* listed building, was harmed by the proposals. During the course of the Inquiry they accepted however that the relationship of the development to the church was more appropriately to be considered in the context of its effect on the broader townscape. This is reflected in the reasoning below.
5. Planning obligations are submitted under section 106 of the Act comprising an Agreement in respect of TBHSPA mitigation (comprising a financial contributions of £1,950,348.73 towards Suitable Alternative Green Space (SANG) and £230,348.73 in respect of Strategic Access Management & Monitoring (SAMM), £338,714 towards highway infrastructure improvements and £218,947 towards the provision of public art on the site. The Agreement also makes provision for on-site AH comprising 45 shared ownership properties (SOPs). A provision of the obligation in respect of AH also facilitates a review of the provision should the actual yield of development value exceed that anticipated (overage). There is disagreement between the parties over the terms of the extent and use of the overage defined and there are thus alternative paragraphs reflecting these differences in the Agreement. This matter is considered in more detail below under 'Section 106 matters'.
6. A Unilateral Undertaking (UU) has also been submitted by the appellant securing a financial contribution to Guildford Station platform works. It is accepted (as set out in the SoCG) that these constitute off-site works and are therefore not necessary to allow the grant of planning permission for the development. They are nevertheless also considered below in the aforementioned section.
7. Given the nature and extent of the site, the proposals and the points within its environs from which it may be understood, a series of site visits were undertaken over the course of the two weeks of the Inquiry. These visits included the station site in the early morning, longer views from within and without the town, incorporating those from the Castle Motte and Keep, the Cathedral tower and the Jellicoe Roof Garden off the High Street.

Main Issues

8. The main issues in this case are:
 - a) the effect of the proposed development on the setting of 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 lying within them;

- b) the effect of the proposed development on the character and appearance of the surrounding townscape and the wider area and;
- c) in the event of a conflict with development plan policy, national policy or statutory requirements (in respect of listed buildings) in relation to the above, whether there are any other material considerations, by way of public benefits (including the delivery of market and affordable housing in the context of current housing land supply in the borough, transport infrastructure and broader economic uplift) that determine the development should be approved other than in accordance with these policy constraints.

9. In addition to the above a range of other matters were raised by a number of parties at the Inquiry, including the Guildford Access Partnership (GAP), the Guildford Society (GS) and the Guildford Vision Group (GVG). These are specifically addressed in 'Other matters' below.

Reasons

The site

10. The site comprises the current station buildings arranged in linear form north/south adjacent to the existing track and platforms and its attendant areas of extensive car parking laid out to the east of the station buildings. The site lies to the west of the historic core of the town on the rising ground on the far bank of the canalised River Wey. Although now largely dominated by modern commercial office buildings, the historic relationship of the railway and river can still be understood through the survival of The Billings, a former warehouse sitting on the very bank of the river in close proximity to the station precincts. There can be little doubt that the coming of the railway, as is the case with many historic towns, had a significant effect on Guildford. This was certainly the case by the 1880s, when the station complex, and the volume of traffic flowing through it, had increased considerably in size. Not only the station but engine depot and transit sheds would have been clearly visible from the historic town looking towards the rising ground to the west. Moreover, these integrated transport modes were also the catalyst for the growth of the industrial activities and structures on the eastern bank of the river, again evident in the historic mapping and photographs of the town¹.
11. The old station buildings were demolished and replaced in the 1980s and its forecourt, already without its former transit sheds, was remodelled to accommodate extensive areas of car parking. The difference in levels between this area and the road below, now being defined by a tall brick retaining wall, is breached only by the access ramp to the carpark above. At the same time adjacent sites were cleared and redeveloped with modern commercial buildings architecturally characteristic of that decade, which now define the character of the margins of the site today. It must be partly as a result of this degree of change that the Millmead and Portsmouth Road Conservation Area (M&PRCA) stops short of the station approach to the south and why the Bridge Street Conservation Area (BSCA), incorporating the eponymous Grade II Onslow

¹ ID22.

Bridge dating from after the coming of the railway, terminates on the eastern side of Walnut Tree Close adjacent to the station carpark.

12. That said, because of its location, extent and degree of topographic elevation, the site has a close relationship with its immediate surroundings and can be seen from key points within the town as well from the surrounding wider area, including from the tower of the Cathedral to the north west. Also reflecting its importance as a key transport node and the open extent of the greater site, it has long been recognised as having the potential for redevelopment. This is codified in the now saved Policy GT8 of the Guildford Borough Local Plan 2003 (GBLP) and in Policy A7 of the Guildford Borough Proposed Submission Local Plan: strategy and sites (GBPSLP). Both iterations of the policy seek a comprehensive mixed use of the site to incorporate a new station, homes, shops, offices, open space and leisure uses.

The proposals

13. The proposals reflect these policy aspirations and have evolved over a considerable time, undergoing significant amendment in response to engagement with statutory and non-statutory bodies and public consultation. Beyond fulfilling expectations of multiple uses anticipated by policy, the proposals also include a primary area of civic open public space, other areas of open green space, a new and enlarged station building and a multi-storey car park to compensate for the loss of the open facility to be developed. Improvements to the functionality of the Walnut Tree Close junction and improved pedestrian and cycle links to the town centre are also provided through planning obligations. Above all it is expected to deliver residential accommodation on a significant scale (the draft policy anticipated approximately 350 homes) along with a concurrent policy expectation that 25% of these be affordable (the draft policy anticipates at least 40% affordable homes).
14. The scheme has change significantly in response to consultation, with the southernmost elements around the station being reduced in height. The effect though has been a redistribution of development across the site, rather than a net reduction in its quantum. This has had consequences, with an overall flattening of the profile and selective thickening of elements of the scheme. This in turn has resulted in further articulation of the form of the structure and the deployment of different material treatments.
15. There is a useful summary of the evolution of the proposals and how they have changed in response to the dialogue with key agencies in the SoCG. The result is a sequence of eight development blocks ranging from six to ten stories arranged in parallel to the railway with an extensive plaza to the southern end. This is focused around the replacement station building with elements enclosed by the associated residential blocks to south, north and east. To the north of these lies the carpark and beyond, a further sequence of residential elements with associated open space and links to Station Approach and Walnut Tree Close to the east. Each block has a measure of visual differentiation both reflecting the differing character of their uses and to variegate the principle elevation with different tones and textures to relieve the extended mass of the combined structure.
16. This is a long, narrow site with significant infrastructural, public realm objectives and commercial floorspace to deliver, in conjunction with high expectations on providing much needed affordable and market housing. Whilst

the viability assessment provided in relation to the provision of affordable housing (and accepted by the Council) is project-specific, it cannot easily be ignored in relation to the deliverability of the site in the wider sense. With the parameters of the site clearly set and aforementioned policy-led expectations in place, this was always going to be a substantial development, by however means it was to be brought forward. The question therefore asked by these particular proposals is whether they can deliver the key policy objective of providing a mix of uses, public realm and station improvements on the site, which engages with its urban context and at the same time safeguards the setting of designated heritage assets within its milieu? It is to these matters that I now turn.

Effect on the setting of designated heritage assets

The cathedral

17. There is no dispute amongst the parties that Sir Edward Maufe's Cathedral Church at Guildford is a building of outstanding architectural and historic interest. It is unquestionably an assured ecclesiastical building in its own right, drawing as it does from the deep well of the Gothic building tradition in Britain, as well as assimilating the overtly modern (see the reinforced concrete of the crossing) and Arts and Crafts references current and influential at the time of its design. There can also be no dispute that the immediate setting of the Cathedral Church, with the long formal approach of the western garth (and its early accommodation of the motorcar) is also an intimate and key component of its setting.
18. Maufe, like his clients, must also have very much approved of the proposed location for the new Cathedral on Stag Hill, an eminence that for long has been a prominent element in the topographical context of the historic town. Aside from being a clear site in reasonable proximity to the town, its elevated position provided the ideal platform on which the new edifice could be seen, both from the town below, but also from many points from within the newly established diocese, some at a considerable distance².
19. In the context of the definition of setting offered in the National Planning Policy Framework³ (the Framework), (which advises this is 'surroundings in which a heritage asset is experienced'), this defines the setting of the Cathedral in very broad terms. Indeed, as the appellant suggests, such a broad scope means that many, many development proposals may be held to come within its setting. Most would agree however that aside from some generic inter-visibility, a great number of such proposals could not reasonably be held to engage with or alter its setting in a material way. For the purposes of this appeal therefore we need to look more closely at the context of the Cathedral as it is perceived from the town, and in which context this development will be viewed.
20. Historic England (HE), in their combined formal response to the proposals, argue the 'Maufe deliberately exploited the hilltop setting for his monumental church, intended to be seen above the town, in near and far views'⁴. They go on to suggest the effect is an 'imposing', 'commanding' and 'monumental' structure perhaps with the intention of dominating the town. There is much cogency to

² A map in the Cathedral shows it to be very close to the epicentre of the Diocese. From the tower the modern towers of London are visible, whilst views to the west and south reach to the Hampshire and north Sussex.

³ Annex 2: Glossary, p56.

⁴ CD A14 and CD B11 – HE consultation letters.

this view, and I conclude this sense of lofty dominance, separate from the urban fabric of the town below, defined by the skirting of pasture and the maturing tree cover in proximity to the building, enhance these characteristics. The eastern slopes below the Cathedral can rightly therefore be argued to comprise an element of the setting of the listed building and, insofar as they serve to maintain its sense of isolation and dominance on the skyline, contribute substantially to the significance of the designated heritage asset.

21. There are a number of locations from within the town where this relationship can be understood. Primary among them is when the Cathedral is viewed across the roofs of the old town and its modern extension west of the river from the town's Castle Motte. There are a number of reasons why this view is generally recognised as being an important (though not exclusive) platform for considering the acceptability or otherwise of the proposals. Firstly, it offers an open vantage point with its own degree of elevation from which the Cathedral may be viewed, in south easterly perspective, across the townscape of the settlement. Additionally, it is an iconic and highly designated heritage asset popular with visitors and residents of the town as a refuge from its busy streets. This recreational use has some provenance⁵ and the high level of public access means views from the Motte, and to a lesser degree the Keep, will have a degree of collective consciousness and memory.
22. That said, the significance of the co-visibility of the two highly graded heritage assets (the Castle and the Cathedral) can be over-played. As HE point out, there is no such binary representation of historic temporal and spiritual power at display here, as expressed in other such co-relationships presented by the Council⁶. Both structures are literally of different Ages and their co-visibility is fortuitous, though undoubtedly picturesque in the proper meaning of the term. The reverse view of the Castle from the cathedral tower affirms this conclusion, where the Castle is seen against the backdrop of other buildings and trees to the south east of the town. Whilst the significance of this view in-the-round may have been overstated (none of the seats offer a prospect directly over this part of the town and the tree cover is not apparently managed to enhance the view) it still nevertheless provides a significant platform from which consider the effect of the development on the setting of the Cathedral.
23. It is the case that the amended scheme does not completely avoid breaking the skyline to the south of the Cathedral in the view from the Motte. The southernmost elements of A1 Block break beyond the extended clump of trees forming part of the broader verdant apron at the base of the Cathedral. However, this is a very modest breach, the Council's wireline composite most clearly identifying two small notches of sky being occluded⁷. Furthermore, this infringement is some distance from the base of the building itself and, when measured against the proximity of the visible University buildings to the north, not far short in terms of equidistance. Moreover, it is at this most southerly point that this element of the structure is at its most visually permeable, with the upper floors set back within open brick structure incorporating internal balconies. This, combined with the pale brickwork used to clad it gives this, the most elevated element of the structure, a lighter more open character.

⁵ The grounds of the Castle were laid out as a public park in the later C19.

⁶ Coleman PoE Appendix 11.

⁷ Ibid Appendix 6, A55.

24. As the development progresses north along the site its mass drops down perceptibly, again when viewed from the Motte. Here the breaks in its form and the changing roof heights rapidly take its profile back amongst the existing development on the lower eastern slopes of the Cathedral. Taking all of the above into account, I conclude that although the margin is close, the proposals enable sufficient of the verdant treed hilltop to remain in view, thus allowing the Cathedral to retain its isolated primacy or dominance on the skyline above the town, so preserving its setting and therefore its significance.
25. It is accepted that the redistribution of building mass following the amendment to the scheme has resulted in a greater degree of horizontal emphasis, but it does not follow automatically that this results in a monolithic, largely unbroken length of assertive architecture, as the Council suggest⁸. It is perhaps coincidental that Blocks A2 and B forming the 'Civic Character Area' around the Station Plaza are aligned almost directly below the Cathedral in the Motte view. It is here that the development is at its most three-dimensional, as each component block serves to enclose the formal open space giving a sense of depth, shade and texture to the main southern component of the scheme. This theme is carried northward with differing elements breaking forward or stepping back at upper levels in an almost post-modern form of concatenation, giving texture and rhythm to the extended elevation.⁹
26. Similarly, it is not reasonable to assert that the mixed application of materials has no or very limited effect or that it is, as the Council suggest, 'a brick box with openings cut-out'. The differing brick treatments and tones, in conjunction with changing proportions of openings and fenestration all add variegation and texture to the elevations, helping to contextualise the development with the surrounding townscape.
27. It is apparent that when viewed from the tower of the Cathedral this depth and texture is not so readily expressed, as the development is compelled to observe the linear assertion of the railway. Nevertheless, there is still a continuing change in rhythm set by the varying roof heights, material colour changes and elevational texture through the provision of balconies. In fact, from this elevated perspective the A1 Block terminates almost within the visual envelope of the Debenhams Building to the south and below the stern flat roofed buildings of the northern town centre. Whilst emphasising the historic divide of the railway on the one hand, the development would also successfully blend with the wider tableau of the modern town beyond on the other.
28. I fully accept that whilst not a public view in the full sense, access to the tower nevertheless still allows up to approximately 600 people a year to take in the grand prospect it reveals. The view from the tower of the Cathedral is certainly one instructive to this case, not least in that it confirms the conclusions set out above that the development can sit within the envelope of the town here and avoid harm to character, but because it also emphasises the very extent of the Cathedral's visual reach, and therefore its expansive setting.
29. This is nevertheless a substantial development proposal. It is the case that as a result of its scale form and extent, it will interpose, intervene and insert itself within the townscape of modern Guildford, certainly within the setting of the

⁸ Paragraph 19, Closing Submissions.

⁹ The Palladian theory of staccato composition.

Cathedral. It can rightly therefore be held to affect and indeed perceptibly alter its setting.

30. Such interposition however can, in my view, be achieved whilst also ensuring that sufficient of the hilltop remains in view so allowing the dominance of the Cathedral, set upon its green bosky eminence (most specifically in views from the Motte) to be fully safeguarded. My conclusions therefore accord with those of HE, who have confirmed in their second letter that in achieving this aim, their main concerns over the setting of the designated heritage asset had been addressed¹⁰. I duly afford the assurance of this view significant weight. The 'Bowl' methodology applied by GBC as a measure of defining some form of cordon sanitaire at the base of the Cathedral has a measure of analytical merit. However, it proves as much as any other approaches, for example as set out by HE in their advice on settings and views of heritage Assets¹¹ that any such undertaking should apply a rigorous analytical process.
31. Moreover, the proposals in their broader context, because of their articulation, detailing and material treatment, would not result in a monolithic, unduly assertive development adversely challenging the Cathedral in either proportions or architectural expression. For all these reasons therefore, the proposals would preserve the setting of the Grade II* listed building in accordance with the expectations of the Act¹². It would also meet the objectives of paragraph 132 of the Framework which anticipates great weight being given to the conservation of designated heritage assets and their settings. For the same reasons they would accord with saved Policy HE4 of the GBLP, which seeks to safeguard the settings of listed buildings through the control of development.
32. I note the reference to saved Policy HE1 in the Council's reasons for refusal No.1. However, this refers to proposals which would affect listed buildings, specifically in relation to alterations and additions to them and has no relevance to these proposals.

The roof garden

33. As the Register description states, the roof garden, sitting atop the former Harvey's department store, was designed as part of the shop building as a whole by Sir Geoffrey Jellicoe and Partners in 1956-7¹³. Jellicoe's self-confessed aim for the garden (was for) 'primarily a sky garden and the underlying idea has been to unite heaven and earth; the sensation is one of being poised between the two'. The registration description goes on to suggest persuasively the 'the water in the garden was to reflect the sky with its different cloud formations, and to emphasise this, Jellicoe created a viewing platform on top of the café, so the garden could be viewed from above'.
34. This strongly suggests to me that the intention was *primarily*, in landscape terms, an introspective exercise in defining an elevated outdoor space where the viewer was brought literally to the joining of their terrestrial platform with the heavens, the sensation being amplified by the reflections of the sky when specifically viewed from the now lost flat roof above the café designed specifically for that purpose. Of course, there is also little doubt that in addition to this spectacle, the panorama of the town, with its surrounding green

¹⁰ Ibid CD B11.

¹¹ Historic Environment Good Practice Advice in Planning Note 3 – The Setting of Heritage Assets (2nd Edition).

¹² The Planning (Listed Buildings and Conservation Areas) Act 1990.

¹³ Harvey's is now under the branding and ownership of House of Fraser.

topography forming its own bond with the heavens, would reinforce this aesthetic construct. However, the intermediary townscape, particularly to the west on both sides of the river, was also changing, and has continued to change over time. It is reasonable, on the basis of the architect's stated intentions, to conclude that this intervening townscape was little more than an incidental participant in the greater delight of the fusion of heaven and earth.

35. The development proposals would be discernible in views from the garden to the west (beyond the utilitarian superstructure of the associated building). They would, because of their height, obscure views of a band of tree planting to the west of the railway. But they do not intercede in the critical relationship with the skyline of the higher ground to the west, the unchallenged pre-eminence of the Cathedral in that view, or the dynamic relationship between it and the heavens above. The proposed development would be evident in views from the garden and this general outlook, forming part of its significance, would be altered. But this degree of alteration, or change, would not constitute material harm, as the asset's significance would remain undiminished as a result of it. Once again therefore, there is no conflict with the expectations of paragraph 132 of the Framework, which anticipates great weight being given to the conservation of designated heritage assets, including their setting.

Setting of the conservation areas, including that of the Billings, a non-designated heritage asset

36. The site lies immediately to the west of the Bridge Street Conservation Area. This is a relatively modest area focused on the eponymous Onslow Bridge, a Grade II listed structure. It is defined as much as by its positive townscape structures as by key survivals of the new town's industrial and mercantile past. There are former factory buildings and on the east bank of the canalised river, a substantial former warehouse building.
37. Chief amongst the non-designated heritage assets within the area, and easily both the most striking and well preserved, is The Billings, a complex of warehousing and former processing facilities standing on the west bank of the River Wey. Formally facing the transit sheds and yard of the station to the west, this is now replaced by the road and the retaining wall of the station car park, crested by parked vehicles. It has a striking concave elevation to the east with a rank of five lower gabled bays set between taller gabled and eaved end-bays. It can be clearly appreciated in views from the approaches along Bedford Road to the east and Onslow Street further afield. It can also, perhaps most advantageously, be viewed from the bridge, whilst there are also elevated views of the complex from the existing station carpark and Walnut Tree Close. In contrast to other identified buildings within the conservation area however, it is not identified as a locally listed building.
38. Despite the scale and proximity of the proposed development in relation to The Billings when seen from the bridge, the historic building convincingly holds its own. Whilst the new buildings enfold the old, taking their cue from the height of the exiting Bridge House, the curved frontage and the lively staccato of the gables allow The Billings to stand their ground in this prospect. Their setting would once again be affected, even significantly changed, but this would not amount to material harm such as to suggest conflict with paragraph 135 of the Framework.

39. The position is rather more challenging in relation to the views from Bedford Road and Onslow Street¹⁴. In the latter, the longer view, the disparity in scale between the proposed development and the historic building is at its most apparent. From here the new buildings would appear to finish at almost twice the height of The Billings, diminishing its visual presence as a consequence. However, this disparity rapidly diminishes on the approach to the pedestrian bridge where the shortened perspective allows the two to be seen almost in balance, the gables of The Billings almost meeting the leading edge of the station building. Nevertheless, in this critical view the setting of The Billings, notwithstanding the acknowledgement that any development on the site is likely to have a similar effect, the setting of the non-designated asset would be diminished, harming its significance to a modest degree.
40. However, such a conclusion still does not account for the effect of the development on The Billings when viewed from the west. Yes, although set-back across the Station Plaza, the new buildings will still be of imposing scale. But what they will also do is frame an open civic space, at grade with The Billings, thus allowing it to engage with other buildings around a coherent space which at the present moment it simply does not do. The present arrangement, with the bluff intimidating retaining wall of the carpark, reduces the road to a hostile conduit for through-traffic, hostile to pedestrians. The present appeal site to the west of The Billings actively and significantly detracts from the setting of the non-designated heritage asset, and the proposals would significantly improve them. When considering the balance of harms and benefits of the proposals in-the-round, I conclude the overall effect on the significance of the asset would be neutral. In this regard therefore there would be no conflict with paragraph 135 of the Framework in respect of the non-designated heritage asset.
41. Given the contribution The Billings makes to the character and appearance of the conservation area in relation to these proposals, it follows that there would be no material harm to the setting of the Bridge Street Conservation Area as a whole. There is therefore no conflict with paragraph 132 of the Framework or with saved Policy HE10 of the GBLP, which specifically seeks to safeguard the settings of such assets.
42. The Wey and Godalming Navigation Conservation Area covers a small section of the river and its canalised banks between the Onslow and High Street Bridges. Though abutting the Bridge Street Conservation Area to the north, it is set very much below the substantial modern commercial buildings that intercede between it and the station site. There would be very little co-visibility between the two entities and no harm to the setting of the conservation area would result, again in accordance with paragraph 132 of the Framework and saved Policy HE10 of the GBLP.
43. The Millhead and Portsmouth Road Conservation Area to the south of the Navigation is considerably larger in extent, including the valley floor and the rising ground to the west. Encompassing the river and the navigational infrastructure of the commercial waterway, it offers a naturalistic and picturesque context away from the bustle of the new and old town.
44. The proposals would be framed by the existing buildings along Bury Street, occluding the open sky between. However, the profile of the new structure sits

¹⁴ CD B8 Addendum views 22-23 Appendix 8 Supplementary Environmental Statement.

below the parapets of both opposing structures and appears subservient in this view. Similarly, views of the proposed development from the High Street Bridge are almost completely obscured by the existing modern development and no material effect to the setting of the conservation area would result. No conflict with paragraph 132 of the Framework or saved Policy HE10 would therefore arise.

45. Deeper within the Millhead conservation area there are views back along the river, most specifically from the pedestrian bridge, where people can take in the prospect of the town, including the imposing edifice of St Nicolas Church (a Grade II* listed building) standing on the western abutment of High Street Bridge. The proposed development would be visible to the west of the tower above the ridge of the chancel roof. The sky-take here at first glance seems considerable until it is realised that it is difficult to differentiate the oxidised lead or zinc of the roof cladding with the tone of the sky above; once this is understood the actual loss of space around the tower is considerably reduced. Moreover, the element of the development seen here is A1 Block with its pale brick and upper open-work fenestration. This would be a very light visual touch on the context of the tower and would not amount to harm to either the setting of the Grade II* listed building or to the wider townscape context. No conflict with either the expectations of the Act, paragraph 132 of the Framework or saved Policy HE4 of the GBLP (which seeks to safeguard the setting of listed buildings) would therefore result.

Effect on the character and appearance of surrounding townscape

46. A good deal of the Council's concerns relating to the effect of the development on the surrounding townscape, including the suggested 'monolithic' form of the building and its 'unrelieved mass' have been addressed above in respect of the setting of the Cathedral and roof garden. The GS affirms that most of the points on design and on heritage assets they wished to make were consistent with those made by the Council. They do however go further in their criticisms of the scheme in relation to the town of Guildford, using reasoned, though at other times passionate and provocative language to describe the development as the 'Great Wall of Guildford' or a 'monster'. These epithets are also accompanied by a range of comparative examples to emphasise the point; there is an interesting discourse on the comparative city block proportions in a number of global conurbations, including New York, as well as street frontages closer to home in London, in relation to the development proposed.

47. Whilst interesting in themselves, such approaches, shorn of context (or in the case of Manhattan, the corresponding block heights) do not meaningfully help the decision-maker to reach a conclusion in respect of these particular proposals. As has been stated earlier, the linear nature of the site, its infrastructure and policy-led use requirements will, to a significant degree, determine that any redevelopment of this site will necessitate a structure or structures of some substance. This is acknowledged also in respect of The Billings when viewed from Onslow Road; any new development will almost certainly be seen above it.

48. Rather than abstract notions of city block length, it is necessary to understand how the proposals will visually engage with their context. For this to be successfully achieved in design terms this does not necessarily mean it has to 'fit-in' or replicate existing patterns and styles of architecture. Indeed, such an

approach can rapidly lead into error, especially in relation to a site like the station which, by the fairest of interpretations, the westerly context is a desultory, incoherent nowhere-place.

49. When the proposed development is properly considered in the context it will be perceived (as best we can from the visual and three-dimensional material before us) it is self-evident the development does not constitute a 'wall' but is a vigorously articulated group of architectural components set in different heights and planes to one and other. The residential blocks to the north are more assertively articulated with set-backs and staggered roof lines, further softening their form. The whole is variegated by the application of a mix of materials that picks up the variety of the site's townscape context.
50. At the same time however, the proposals, in the wider townscape context, are still indeed clearly discernible as something other from those that surround it. This however, is no bad thing in itself. As the South East Regional Design Panel (SERDP) point out in their letter 'the station is the driving ambition and opportunity to deliver the future success of the town. It must be conceived in its urban design as the key component of the development'¹⁵. Here, in pure design terms, and in the key view from the Castle Motte, the new station building, with its luminous translucent façade, achieves this visual focus, with the enablement of the strong discernible civic space that forms its context. I concur with the conclusions of SERDP that the main design moves set out here (in the final form of the development) are 'sound', and afford their views, as a key authority in the region on design matters, significant weight.
51. This broad architectural intention is further underpinned by the quality of the urban environment that would be created at a human level. The Station Plaza and coterie of symbiotic uses will create an active space framed by civic architecture expressing high quality detail, materials and finish. This would be a quantum move away from the present circumstances which offers none of these attributes or aspirations that the station, and indeed the town, have very long needed. The proposals then, whilst differing from but successfully engaging with their surroundings, respect their context, and so accord with saved Policies G5(1), G5(2) and G5(6) of the GBLP which respectively seek to safeguard the context of new development, guide scale, form and proportion and important public views and roofscape. For the same reasons, the proposals would also accord with the policies requiring good design set out in section 7 of the Framework, specifically paragraphs 63, 64, 65 and 66 thereof, which seek to raise the standard of design generally, anticipate that development proposals take opportunities to improve character and quality of an area and support the grant of planning permission for development that promotes high levels of sustainability, which it is unquestionably agreed this development is in locational terms.

Other matters

Prematurity of the proposals in relation to the emerging development plan

52. GVG have presented a broad range of objections to the proposals, a number of which are consistent with those expressed by GS and GBC for example in relation to design and the extent of transport and other benefits presented. Their main concern however is that the grant of planning permission for these

¹⁵ CD B10.

proposals would be premature in relation to the examination and testing of the emerging new development plan, the GBPSLP. This is largely predicated on a significant conflict with key proposals in the GVG town centre masterplan that has been developed by the group through local input and consultation and which they intend to present to the Examining Inspector at the upcoming examination of the GBPSLP with the hope of their incorporation into the plan. At the heart of the GVG plan is a new bridge crossing the railway and river that will, they suggest, significantly shift the main flow of traffic to the north of the existing gyratory, unlocking further opportunities for transport improvements (including line capacity at the station) and public realm improvements.

53. There is much to commend the GVG approach, both in exploring legitimate aspirational objectives for the town centre and as a vehicle for engaging local people in the strategic planning process. The real challenge for such local initiatives however, is to secure the buy-in of the local decision-making authorities and key infrastructure stakeholders, in this case Network Rail (NR), Surrey County Council (SCC) as highway authority, and crucially, GBC as the development management decision-maker and plan-maker. For all its merits however, the GVG plan does not, in the crucial respect of the strategic new bridge, have the active support of any of these key players. Indeed, despite the view of GVG that the plan will get a hearing at the upcoming local plan examination (and I have no reason to believe it will not) it will do so not having been supported or included in the draft plan by any of the key participants in the plan-making process, most significantly GBC, the author of it.
54. This decision is not the forum for a pre-run of the local plan examination, and I am mindful not in any way to fetter the Inspector's thinking on the soundness or otherwise of the plan. However, guidance set out in Planning Practice Guidance (PPG) on the prematurity of development is clear that where specific development proposals would undermine the plan-making process by predetermining decisions on development 'central to the emerging local plan', and that plan is at an advanced stage, a case for prematurity may be made. However, despite a very lengthy gestation (and no doubt consideration of the GVG plan) and extensive public consultation, the emerging GBPSLP contains no specific policies with regard to the GVG bridge and related highway works that would be undermined by this proposal.
55. Moreover, whilst there may be disagreement as to whether the current development proposals comply with emerging development plan policies in respect of design and heritage assets, there is no suggestion they compromise the delivery of other aspects of the plan in strategic planning terms. In short therefore, there is no support for the prematurity argument from any of the key participants in the plan-making process and most significantly from GBC.
56. In this key regard therefore I am only able to afford such a prematurity argument very limited weight. Whilst this may come as a disappointment to GVG, they may still carry their case for the wider plan to the GBPSLP examinations, and all the work of the wider plan seeking other improvements may still be invested in other town centre master planning initiatives as they come forward in the future.

Access for all

57. GAP raised a number of concerns in relation to the proposal, including a lack of separation between cyclists and pedestrians in the public spaces, the limited

provision of taxi spaces in proximity to the station entrance and the absence of cover in the event of inclement weather, the absence of measure to deter or control anti-social behaviour in the public spaces, apparent lack of access to the greater station beyond the new ticket hall, doubts over the accessibility of the residential units for disabled people, concern over the limited provision of affordable homes and car parking spaces and the apparent lack of a controlled crossing from Walnut Tree Bridge to the site.

58. A number of these points, such as the question over weather protection at the taxi ranks and lift access to the residential units, can be resolved through the interrogation of the detail of the proposal. Detailed drawings indicate the taxi ranks will have covered waiting areas with spaces between each one to facilitate access. Whilst the shortest appropriately graded route from the taxi rank has been offered, this will be at a greater distance than that offered at the current station. However, in other respects access will be enhanced. The ramp from Walnut Tree Close is not to currently agreed grade and the extensive reordering of the fore court area here, with the provision of a lift to enhance direct access, will offer a significant improvement in this approach to the station¹⁶. The appellant also makes clear that the station forecourt will not be a shared surface as such and cyclists and pedestrians will be filtered through way-marking to anticipated destinations and routes. Moreover, concerns over disabled parking provision and access to the station have been resolved through specific derogation agreement from the Department of Transport and there is sufficient flexibility in the management of the car parking stock to allow increased disabled parking provision if greater demand is identified.

59. It is the case that taxi users, including those with disabilities, will have to walk further to the new station than at present. However, this is as much if not more the result of the opportunistic use of the otherwise presently redundant bus bays than any form of formal provision. In any event, in other respects access for all people to the station will be materially improved, especially from the Walnut Tree Close direction. Whilst no crossing of the road at this point is currently proposed, there is provision, based on future assessment of traffic flows, for such if proven necessary or desirable. It should also be remembered that the Council's concerns in respect of these matters were made in the context of a judgement on the extent of the benefits the scheme may bring, not on the basis of a clear and identified objection on the grounds of deficiency. No conflict with development plan policy or statute (in the context of the Equality Act) has been identified and in my view, the balance of access improvements across the development for all people outweighs the minor shortfalls.

Future provision for the expansion of the railway station

60. Both GVG and GS express concerns that the proposals would compromise the future expansion of the railway station through precluding an additional platform. To this end GVG presented evidence indicating that the application to dispose of the land by NR to the Office for Rail and Road (ORR) had been withdrawn in 2015. NR however has advised that significant further work on route planning and expansion has been undertaken such that there will be no future objection from ORR to the land transfer in respect of Guildford Station. The appellant has stated that the development may proceed without prejudice to the possible future expansion of the station and this position is supported by

¹⁶ Provision for a pedestrian lift is secured through condition, with the justification set out in paragraph 87 below.

NR in its capacity as rail network manager. I am therefore satisfied on the basis of the evidence before me that this is indeed the case and no substantive objection to the proposals can be sustained on these grounds.

Taxis and cycle provision

61. I acknowledge the concerns expressed in relation to taxi-tank provision and the apparent constraints on the system proposed. However, this appears partly based on the anticipated loss of the current arrangement relied significantly on the use of the currently redundant bus bays to accommodate taxi provision. Whilst there may be some constraints in the approach proposed, these are not insuperable as self-regulating taxi service provision demonstrates in other circumstances and, once again, there is no formal planning objection based on the arrangement proposed either from GBC or SCC.

62. From a cyclist's perspective I can also understand the frustration that the development proposed does not do more to resolve some of the wider structural barriers (most obviously evident in the notorious gyratory of the bridge crossings in Guildford) to increased cycle use and safety. However, the scheme nevertheless does offer improvements to town centre connectivity for cyclists and the storage of bikes at the redeveloped site. Whilst not enough for some, such an approach is supported by SCC and there are no planning objections on grounds of inadequate cycle network provision put forward or defended by GBC. On the basis of the evidence I heard at the Inquiry, I have no substantive basis to disagree with either of their conclusions.

Transport, housing and other infrastructure issues

63. GS assert that the development proposal will lead to a worsening of infrastructure constraints in the town, threaten the viability of other development in west Guildford and impair GBC's ability to deliver its new local plan. It may be the case that Guildford has had to wait some time for a tangible improvement to the station area and its associated transport infrastructure seen as central to improving the local road network. Indeed, it may also be the case that these proposals will not deliver the wider strategic improvements aspired to by the GS and GVG. But on the evidence before the Inquiry it is not right to say that the delivery of future transport infrastructure, including additional platform capacity at the station nor the Sustainable Movement Corridor identified in the GBPSLP, will be compromised by these proposals. This is not the case, and there are no objections to it from NR, SCC or GBC, the local planning authority, on these grounds.

64. Nor is it correct to suggest that no or negligible benefits would result from the development. The passenger experience of using the station would be significantly and demonstrably improved and the Station Plaza and its connection to the town centre would be very significantly better than that which exists at present. Whilst it is right that increased housing provision should not be accepted at unreasonable costs to the environment, there can be no doubt, as agreed by both parties, of the acute need for market and affordable housing in the Guildford area. I have not identified any material conflict with development plan policy or statute in respect of the character and appearance of the area or setting of designated heritage assets. However, it is right to acknowledge that this development will bring forward a significant number of new homes, some within the next five year planning cycle. This will mean homes for people in the town where they may not otherwise have been

available. Although the number of these defined as affordable will be less than development plan policy anticipates, this is justified by the independent assessment of the appellant's viability assessment commissioned by the Council, and remains a positive contribution nevertheless. Moreover, these new homes will be in a highly accessible location, one of the key incentives to encourage residents to use modes of transport other than the motorcar, thus incrementally supporting the aims of GS and GVG, as well as GBC, to achieve modal shifts in transport choices.

65. Whilst not necessary to justify the development in terms of policy conflict, it is right to acknowledge the proposed development will bring forward a plan-led mixed use development with a range of socio-economic benefits, an outcome the planning system should aim to facilitate.

Section 106 matters

66. It is agreed that the site lies within the 400m to 5K zone of the TBHSPA. In accordance with the TBHSPA Avoidance Strategy Supplementary Planning Document 2017 (TBHSPAASSPD) provision should therefore be made to avoid any significant adverse effects on the designated European site. The first schedule of the section 106 agreement requires that phased payment be made to GBC for the purposes of upgrading an area of SANG within the borough. Further payments are also facilitated for the future management and monitoring of the SANG through the provision of a SAMM. The TBHSPAASSPD is framed such that any such contributions must fully mitigate any threat to the site (thus rendering any development acceptable in planning terms), should be appropriately calibrated (thus being proportionate) and that it be directly related to the site (insofar that such SANG capacity is available within the borough). As such therefore these contributions accord with the Community Infrastructure Levy (CIL) Regulations (Regulation 122) and may appropriately be taken into account.

67. Saved policy H11 of the Guildford Borough Local Plan (GBLP) makes clear that development proposals should make provision for an element of affordable housing on residential sites, with 'unidentified sites' required to deliver at least 30% AH on the site. This policy also accepts that 'the final number of units to provided may vary with regard to site suitability, the need for affordable housing, and any other material planning or marketing considerations'. As agreed in the SoCG, the proposed development 'will not deliver sufficient revenue to allow for the delivery of a policy compliant level of affordable housing'. Thus the section 106 agreement makes provision for 45 shared ownership dwellings, reflecting the parameters of the viability assessment. The schedule also ensures that no more than 85% of the market dwellings are first occupied prior to the availability of the affordable units.

68. This consensus is based on a Financial Viability Statement submitted and later supplemented by an Update Appraisal by the appellant and independently reviewed by GBC's appointed Assessor. Moreover, in these circumstances, and the policy expectation, the section 106 agreement also makes appropriate provision for a review of AH delivery with particular regard to any 'overage' (the amount by which actual development profit exceeds base development profit) and the use to which that should be put.

69. In the context of the overall conclusions of the tested viability assessment, and in terms of general reasonableness, it is appropriate, and fair, that any overage

payment should amount to no more than the affordable housing policy equivalent sum requires. Moreover, in respect of the use of any such additional monies, it is also appropriate that any additional payments found to be necessary under these terms are specifically directed to the further provision of AH, and not to other infrastructure requirements. With specific regard to the terms of the relevant obligation in the section 106 agreement therefore, it is appropriate in relation to overage that paragraph 5.8.1 applies, and that in respect of its use and application, paragraph 3.1 is relied upon. With all these matters considered this obligation also conforms to the regulatory tests, and may accordingly be taken into account.

70. The agreement also facilitates a contribution of £38,714 towards highway improvements to enhance pedestrian and cycle safety and increased connectivity between the site and the town centre. These improvements, including enhancements to waymarking legibility and to the replacement of the Walnut Tree Bridge or Gyratory functionality will make the proposed development acceptable in planning terms, are proportionally calibrated and are directly related to the site. As such, they too may appropriately be taken into account.
71. The agreement also secures a financial contribution of £218,947 towards public art on the site. Such a contribution is anticipated by GBC's Planning Obligations Supplementary Planning Document and by their Public Art Strategy for Guildford. It is entirely appropriate that a scheme of this magnitude make such a contribution, rendering it acceptable in planning terms. Also being proportionately determined in light of the above, and directly related to the site, such a contribution may also be taken into account.
72. It is agreed in the SoCG that the unilateral undertaking presented in respect of the platform improvements proposed for Guildford Station, constituting off-site works, are not necessary to allow the planning permission to be granted. In other words, they may not be taken into account in the same mitigatory sense the other measures are presented as above. Neither, for the avoidance of doubt, may they be considered benefits of the scheme in any planning balance. However, it is noted that the sum of the payments are accounted for in the agreed viability appraisal and are, at the very least, thus a unilateral commitment to spending the monies at Guildford Station. This may assuage the concerns of some that these could otherwise be spent on any part of the rail franchise network.

Conclusions

73. The proposals accord with statutory requirements, the policies of the development plan and with the expectations of the Framework. Moreover, a further range of potential planning harms can be fully mitigated through planning obligations properly taken into account in this decision. As such, a balancing consideration of any benefits the development may bring, as anticipated by the third main issue identified at the outset, does not arise. However, it should also be remembered that the Framework at paragraph 6 makes clear that the purpose of the planning system is to contribute to the achievement of sustainable development. Paragraph 7 reminds us that there are three dimensions to this development principle: economic, social and environmental. Paragraph 47 of the same is emphatic in its expectation that there will be a significant boost to housing supply across the country.

74. In addition to avoiding harm to heritage assets and townscape quality and other harms, this proposal offers tangible benefits to the built environment around Guildford Station. It also provides a significant amount of market housing and a lesser number of viability-calibrated affordable units, in addition to an enhanced station facility. These are very significant social benefits. The proposals also bring forward a major development site with a mix of uses that will create employment opportunities for those seeking work. These are clear economic benefits to the borough. This is therefore a form of sustainable development that the Framework supports. And, as paragraph 14 states at its third bullet point, this means approving development proposals that accord with the development plan without delay.
75. This is however a proposal that has polarised opinion. Some are shocked by it and its anticipated effects. Perhaps unavoidably, they may have the same reaction to this decision. Strong and well-presented arguments have been put before the Inquiry in support of these views and they rightly merit the fullest consideration. However, as my reasoning demonstrates, a different, structured conclusion can be arrived at, aided by the input of key expertise in the field from HE and SERDP, the opinions of both I have given significant weight.
76. For all these reasons therefore, and having carefully considered all the matters raised in evidence and at the Inquiry, I conclude the appeal should be allowed.

Conditions

77. The appeal being allowed, the following conditions are attached. The detailed assessment of the phased delivery of the development presented by the appellant, relies on the almost immediate fulfilment of prior commencement conditions in order that expectations are met. This is especially relevant to the delivery of housing units within the first cycle of five year housing supply. It is therefore appropriate in this context, and the advice set out in paragraph 027 Reference ID: 21a-027-20140306 of the PPG, which suggests consideration of a reduced commencement date to assist development delivery, that the standard commencement period of three years be reduced to two.
78. A condition is also attached requiring that the development be carried out in accordance with the plans hereby approved (as set out in the detailed schedule in the SoCG) to afford certainty in the development process. Moreover, and in light of the two above conditions, it is also necessary that a further condition is attached requiring the development be carried out in accordance with specific site construction phasing plans already submitted with the appeal.
79. In order that the proposed development truly delivers on the design and finish quality offered in the application, conditions are necessary to secure details of materials (including sample panels), details of all balconies, doors and fenestration, details of vents, flues, roof plant (including cowls and screening), lift over-runs and details of shop front and advertisement strategy, prior to the relevant phase of the development commencing.
80. Also in relation to design, given the sensitivities over the height of the development it is necessary, prior to all development taking place, for a condition to secure details of existing and proposed site levels, so that the precise datum of the proposed development may be established.

- 81.As matters of both hard and soft landscaping are closely related to design quality in this proposal a series of three conditions are necessary to secure appropriate details in this respect, materials, management, street furniture, planting programmes and boundary treatments in order to ensure the delivery of the highest quality public and private realm treatment and safeguard that quality in the future.
- 82.Also to fully safeguard and enhance the existing ecology and tree stock on the site a series of a further three conditions are necessary to secure ecological mitigation and enhancement measures and a tree protection plan for the site both during and after the construction period so that such on-site ecology may be fully safeguarded.
- 83.Similarly, a condition is also required to secure a programme of archaeological investigation undertaken to a prior-approved scheme, in order that any below ground remains on the site a fully understood and mitigated prior to development commencing.
- 84.Given the urban riverine context of the site it is also necessary that a suite of conditions (six in total) is attached both securing the proper drainage of the site, close control of any water infiltration methods and a clear understanding of the effects of the development on current water abstraction sources and any necessary mitigation so that comprehensive water management is secured across the site.
- 85.Also accounting for the scale of the development and the presence of adjacent uses a condition is required to secure details of the design and programming for the foundations and piling on the site in order that living and working conditions for adjacent occupiers are safeguarded. Again, given the extent of the site and its clear anticipated phasing, it is appropriate that these details be submitted prior to each specified phasing rather than prior to any development taking place, which may risk retarding the start date of the early phases of the work.
- 86.Because of the past history of the site as railway infrastructure and industrial transit facility a further suite of conditions (three in total) are necessary to fully address the risks associated with ground contamination. Investigative reports need to fully safeguard ground and surface water contamination during and after construction, phased verification reports are also required, as will be the need for a contingency in the event of unforeseen contamination being identified. All are necessary to fully safeguard water quality both during and after construction.
- 87.Effective delivery of the highway components of the proposal is critical to the success of the scheme; to this end a further series of conditions are required to address different elements of the package. Thus prior to the opening of the commercial units of the scheme a condition is necessary to secure full details of the station forecourt works. Such details will need to include provision for bus and taxi shelters and short term parking provision. These details shall also include the detailed design for a pedestrian lift within the forecourt area to facilitate direct and convenient access for all from the Walnut Tree Bridge approach to the station entrance.
- 88.A condition is also required to secure construction of modifications to the station forecourt area, including agreed visibility zones, to fully safeguard the safety of all station forecourt users. A similar condition is also required to secure

construction of the car park access to the residential units and car park, for the same reasons. A further condition is also necessary to secure the provision of cycle and car parking, loading/unloading and service vehicle manoeuvring space within the site, again to ensure the safety and convenience of all road and forecourt users. To complement these provisions a further condition is also necessary to secure provision of a Servicing and Delivery Management Plan, again to safeguard highway and forecourt users.

89. A condition is also necessary to secure details of the carriageway widening and modification of the Walnut Tree Close/Bridge Street Junction prior to the commencement of development. The works shall be constructed in accordance with the agreed details with an agreed timescale and no later than the occupation of the 289th dwelling. Whilst consideration has been given to an earlier commencement time (the 138th dwelling) the benefits of this earlier delivery, whilst significant phases of construction remain to be completed, is not made clear. In the absence of such a benefit, the latter trigger is considered appropriate.
90. In order to maximise and enhance sustainable travel modes conditions are also necessary to secure Residential and Station User Travel Plans and to secure legible pedestrian and cyclist waymarking schemes across the site clearly identifying linkages with the town centre and other key institutions.
91. Also given the extent, duration and complexity of construction on the site a condition is necessary to secure, prior to the commencement of development, a Construction Transport Management Plan. This should cover a wide range of site-related management issues to safeguard the safety and convenience of all road users and the living and working conditions of adjacent occupiers. For related reasons in relation to the latter a condition is also required to secure a scheme setting out the hours of construction, thus further securing the reasonable management of the site during construction.
92. Because of the proximity of the site to the operational railway it is very necessary that conditions are attached securing appropriate levels of sound insulation, especially in respect of the residential accommodation. Whilst it is right that any such condition should stipulate minimum standards of noise attenuation, associated considerations of ventilation would be covered by appropriate sections of the Building Regulations so any additional requirements secured through a further clause of the condition may be considered duplicatory. Two further conditions are also considered necessary to secure appropriate levels of noise insulation in respect of the commercial units and to ensure that any plant associated with the development be kept to agreed acceptable levels. The former being necessary to safeguard working conditions of occupiers, the latter to safeguard similar conditions and the living conditions of other occupiers within and without the development.
93. Sustainable development is at the heart of the appellant's case and it is therefore appropriate that conditions are attached that secure appropriate standards in the development and finishing of all units, with the clear intention that the approach should be to secure a reduction in carbon emissions across the development. Thus three conditions are attached to ensure the development meets the current standards of acknowledged sustainable development expectations.

94. Because the mix of planning uses across the site have been definitively agreed, a condition is necessary to ensure those uses are complied with. Similarly, it is also appropriate that a condition is attached ensuring that the retail development hereby approved does not exceed that anticipated in development plan policy, in order that the land uses anticipated by the development plan are adhered to.

David Morgan

Inspector

Schedule of conditions

1. The development hereby permitted shall be begun before the expiration of two years from the date of this permission.
2. The development hereby permitted shall only be carried out in accordance with the following approved plans:

Drawing No.	Drawing Title	Rev	Scale	Size
Existing				
B20E01	Existing Site Elevations	P1	1:500	A1
B90P00	Existing Site Plan	P1	1:500	A1
Proposed Site Sections				
T20S01	Proposed Site Sections 14 & 15	P4	1:500	A1
T20S02	Proposed Site Sections 01 & 16	P4	1:500	A1
T20S03	Proposed Site Sections 02, 03 & 04	P2	1:500	A1
T20S04	Proposed Site Sections 05, 07 & 08	P2	1:500	A1
T20S05	Proposed Site Sections 09 & 08	P3	1:500	A1
Proposed Site Plans				
T20P-1	Proposed Lower Ground Floor Plan	P2	1:500	A0
T20P00	Site Plan, Proposed Ground Floor	P3	1:500	A0
T20P01	Site Plan, Proposed First Floor Plan	P2	1:500	A0
T20P02	Site Plan, Proposed Second Floor Plan	P3	1:500	A0
T20P03	Site Plan, Proposed Third Floor	P2	1:500	A0
T20P04	Site Plan, Proposed Fourth Floor	P2	1:500	A0
T20P05	Site Plan, Proposed Fifth Floor	P2	1:500	A0
T20P06	Site Plan, Proposed Sixth Floor Plan	P2	1:500	A0
T20P07	Site Plan, Proposed Seventh Floor Plan	P2	1:500	A0
T20P08	Site Plan, Proposed Eighth Floor	P3	1:500	A0
T20P09	Site Plan, Proposed Ninth Floor	P2	1:500	A0
T20P10	Site Plan, Proposed Tenth Floor	P2	1:500	A0
Proposed Elevations				
T20E01	Station & Blocks A1, A2 & B, Proposed East Elevation	P2	1:200	A1
T20E02	Station & Blocks A1, A2 & B, Proposed West Elevation	P2	1:200	A1
T20E03	Blocks A1 & C, Proposed South	P2	1:200	A1

Drawing No.	Drawing Title	Rev	Scale	Size
	Elevations			
T20E04	Blocks A2 & C, Proposed South Elevation	P2	1:200	A1
T20E05	Blocks A1 & A2, Proposed North Elevations	P2	1:200	A1
T20E06	Blocks C & B, Proposed East Elevation	P3	1:200	A1
T20E07	Blocks C , Proposed West & North Elevations	P2	1:200	A1
T20E08	MSCP & Block B , Proposed South & North Elevations	P3	1:200	A1
T20E09	Block D, Proposed East & West Elevations	P3	1:200	A1
T20E10	Block D, Proposed South & North Elevations	P2	1:200	A1
T20E11	Block E, Proposed East & West Elevations	P2	1:200	A1
T20E12	Block E, Proposed South & North Elevations	P2	1:200	A1
T20E13	MSCP & Block B, Proposed West Elevation	P3	1:200	A1
Building A1 Plans				
TA120P00	Building A1, Ground Floor Plan	P2	1:100	A1
TA120P01	Building A1, 1 st Floor Plan	P2	1:100	A1
TA120P02	Building A1, 2 nd to 6 th Floor Plans	P3	1:100	A1
TA120P07	Building A1 7 th Floor Plan	P1	1:100	A1
TA120P08	Building A1, 8 th Floor Plan	P2	1:100	A1
TA120P09	Building A1, 9 th Floor Plan	P2	1:100	A1
TA120P10	Building A1, Roof Plan	P2	1:100	A1
Building A2 Plans				
TA220P00	Building A2, Ground Floor Plan	P2	1:100	A1
TA220P01	Building A2, 1 st Floor Plan	P2	1:100	A1
TA220P02	Building A2, 2 nd Floor Plan	P3	1:100	A1
TA220P03	Building A2, 3 rd - 4 th Floor Plans	P2	1:100	A1
TA220P05	Building A2, 5 th - 6 th Floor Plans	P2	1:100	A1
TA220P07	Building A2 7 th Floor Plan	P1	1:100	A1
TA220P08	Building A2, 8 th Floor Plan	P2	1:100	A1

Drawing No.	Drawing Title	Rev	Scale	Size
TA220P09	Building A2, 9 th Floor Plan	P2	1:100	A1
Building B Plans				
TB20P00	Building B, Ground Floor Plan	P2	1:100	A1
TB20P01	Building B, 1 st Floor Plan	P2	1:100	A1
TB20P02	Building B, 2 nd - 6 th Floor Plan	P2	1:100	A1
TB20P07	Building B, 7 th Floor Plan	P2	1:100	A1
TB20P08	Building B, 8 th Floor	P2	1:100	A1
TB20P09	Building B, Roof Plan	P1	1:100	A1
Building BC (MSCP) Plans				
TBC20P00	MSCP, Ground Floor Plan	P3	1:100	A1
TBC20P01	MSCP, 1 st Floor Plan	P2	1:100	A1
TBC20P02	MSCP, 2 nd Floor Plan	P2	1:100	A1
TBC20P03	MSCP, 3 rd Floor Plan	P2	1:100	A1
TBC20P04	MSCP 4 th to 6 th Floor Plans	P1	1:100	A1
TBC20P07	MSCP, 7 th Floor Plan	P2	1:100	A1
TBC20P08	MSCP, 8 th Floor	P4	1:100	A1
TBC20P09	MSCP, 9 th Floor - Roof Plan	P3	1:100	A1
Building D Plans				
TD120P00	Building D, Ground Floor Plan, Sheet 1 of 2	P2	1:100	A1
TD120P01	Building D, 1 st and 2 nd Floor Plans, Sheet 1 of 2	P2	1:100	A1
TD120P03	Building D 3 rd Floor Plan Sheet 1 of 2	P1	1:100	A1
TD120P04	Building D, 4 th Floor Plan, Sheet 1 of 2	P2	1:100	A1
TD120P05	Building D, 5 th Floor Plan, Sheet 1 of 2	P2	1:100	A1
TD120P06	Building D, 6 th Floor Plan, Sheet 1 of 2	P2	1:100	A1
TD120P07	Building D, 7 th Floor Plan, Sheet 1 of 2	P2	1:100	A1
TD120P08	Building D, 8 th Floor Plan, Sheet 1 of 2	P2	1:100	A1
TD220P00	Building D, Ground Floor Plan, Sheet 2 of 2	P2	1:100	A1
TD220P01	Building D, 1 st and 2 nd Floor Plan, Sheet 2 of 2	P2	1:100	A1
TD220P03	Building D 3 rd Floor Plan, Sheet 2 of 2	P1	1:100	A1

Drawin g No.	Drawing Title	Rev	Scale	Size
TD220P04	Building D, 4 th Floor Plan, Sheet 2 of 2	P2	1:100	A1
TD220P05	Building D, 5 th Floor Plan, Sheet 2 of 2	P2	1:100	A1
TD220P06	Building D, 6 th Floor Plan, Sheet 2 of 2	P2	1:100	A1
TD220P07	Building D, 7 th Floor Plan, Sheet 2 of 2	P2	1:100	A1
TD220P08	Building D, Roof Plan, Sheet 2 of 2	P2	1:100	A1
Building E Plans				
TE20P00	Building E , Ground Floor Plan	P2	1:100	A1
TE20P01	Building E , 1 st Floor Plan	P2	1:100	A1
TE20P03	Building E, 3 rd Floor Plan	P1	1:100	A1
TE20P04	Building E , 4 th Floor Plan	P2	1:100	A1
TE20P05	Building E , 5 th Floor Plan	P2	1:100	A1
TE20P06	Building E , 6 th Floor Plan	P2	1:100	A1
TE20P07	Building E , 7 th Floor Plan	P2	1:100	A1
TE20P08	Building E , Roof Plan	P2	1:100	A1
Station Plans & Elevations				
A-613-PL-061	Proposed Station Ground Floor	P2	1:100	A1
A-613-PL-062	Proposed Station Mezzanine and 1 st , 2 nd levels	P2	1:100	A1
A-613-PL-063	Proposed Station 3 rd , 4 th , 5 th and Roof levels	P2	1:100	A1
A-613-PL-070	Proposed Station and Office GA Sections	P3	1:100 / 1:200	A1
A-613-PL-071	Proposed Station and Office East and West Elevations	P2	1:100 / 1:200	A1
A-613-PL-072	Proposed Station and Office Platform Elevations	P2		A1
A_613-PL-090	Proposed Station Square Plan	P2	1:200	A1
A_613-PL-091	Proposed Station Square Sections BB & CC	P2	1:200	A1
A_613-PL-092	Proposed Station Square Section Elevation AA	P2	1:200	A1

3. The development hereby approved shall be erected in accordance with the phasing plans 30097_GFD-ST_PHAS-01-01 to 30097_GFD-ST_PHAS-01-12 (inclusive (all Rev 00)).
4. Before the commencement of the relevant phase of the development hereby approved (excluding operations including site preparation, demolition, excavation and enabling works) details and samples of the proposed external surface materials of the buildings including colour and finish shall be submitted to and approved in writing by the Local Planning Authority. The

development shall only be carried out in accordance with the approved details and samples.

5. Before the commencement of the relevant phase of the development hereby approved (excluding operations including site preparation, demolition, excavation and enabling works) sample panels of all proposed external wall finishes, of not less than 1 metre square, showing proposed brick, brick bond, pointing and / or paint finish, shall be constructed on site, inspected and approved in writing by the Local Planning Authority. Once approved the panel(s) shall remain on site for inspection until the completion of the relevant phase of the development for comparison. The development shall only be carried out in accordance with the approved sample panel(s).
6. Before the commencement of the relevant phase of the development hereby approved (excluding operations including site preparation, demolition, excavation and enabling works) details of the design, construction and material of the balconies, Juliet balconies, windows and doors (to include the depth of reveal, method of opening, details of head and side casing and cills) shall be submitted to and approved in writing by the Local Planning Authority. The submitted details shall be at a scale of not less than 1:20 and sample elevations and horizontal/vertical frame sections (including sections through glazing bars) at not less than 1:2. The development shall only be carried out in accordance with the approved details.
7. Before the commencement of the relevant phase of the development hereby approved (excluding operations including site preparation, demolition, excavation and enabling works) details and drawings of all proposed vents, flues, downpipes, satellite dishes, all roof plant and machinery, lift over-runs shall be submitted to and approved in writing by the Local Planning Authority. The development shall only be carried out in accordance with the agreed details.
8. No development shall take place until details of existing and proposed finished site levels, finished floor and ridge levels of the buildings to be erected, and finished external surface levels have been submitted to and approved in writing by the Local Planning Authority. The development shall thereafter be constructed in accordance with the approved details.
9. Notwithstanding the Advertisement Regulations, before the commencement of the relevant phase of the development hereby approved, a Shopfront and Advertisement Strategy shall be submitted to and agreed in writing by the Local Planning Authority. This shall include drawings of the detailed external design of the shopfronts and advertisements across the site. The development shall only be carried out in full accordance with the agreed details.
10. Before the commencement of the development hereby approved (excluding operations including site preparation, demolition, excavation and enabling works), full details of both the hard and soft landscape proposals to include a schedule of landscape maintenance for a minimum period of 10 years, samples and of any hardstanding materials and details of any street furniture, shall be submitted to and approved in writing by the Local Planning Authority. This shall include details of how the installation of the landscaping shall be phased across the site. The approved landscape scheme (with the exception

of planting, seeding and turfing) shall be implemented in accordance with the agreed phasing arrangements.

11. All planting, seeding or turfing approved shall be carried out in the first planting and seeding season following the first occupation of the relevant phase of the development. Any trees or plants which, within a period of 10 years after planting, are removed, die or become seriously damaged or diseased in the opinion of the Local Planning Authority, shall be replaced in the next available planting season with others of similar size, species and number, unless otherwise agreed in writing by the Local Planning Authority.
12. Before the commencement of the relevant phase of the development (excluding operations including site preparation, demolition, excavation and enabling works), details of the external and internal boundary treatments shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be implemented prior to the first occupation of the relevant phase of development. The approved scheme shall be maintained in perpetuity.
13. No development shall take place until the applicant has secured the implementation of a programme of archaeological work in accordance with a Written Scheme of Investigation which has been submitted by the applicant and approved by the Planning Authority. The approved details shall be implemented in accordance with the approved scheme and its phasing.
14. Before the development hereby approved is commenced, an Ecological Enhancement and Management Plan shall be submitted to and agreed in writing by the Local Planning Authority. The approved details shall be implemented in accordance with timescales to be agreed in writing by the Local Planning Authority and retained in perpetuity.
15. The development hereby approved shall only be carried out in accordance with the mitigation measures detailed in Section 4 of the Wardell Armstrong ecological appraisal assessment as provided at Appendix 14 of the Supplementary Environmental Statement. Unless otherwise agreed in writing by the Local Planning Authority, the above identified mitigation measures shall be retained in perpetuity.
16. The development hereby approved shall not commence until an Arboricultural Method Statement (detailing all aspects of construction and staging of works) and a Tree Protection Plan in accordance with British Standard 5837:2012 (or any later revised standard) has been submitted to and approved in writing by the Local Planning Authority. The Statement and Plan shall include details of the phasing of the implementation of the protection measures. The development shall be carried out in accordance with the agreed method statement and no equipment, machinery or materials shall be brought onto the site for the purposes of the development until fencing has been erected in accordance with the Tree Protection Plan. Within any areas fenced in accordance with this condition, nothing shall be stored, placed or disposed of above or below ground, the ground level shall not be altered, no excavations shall be made, nor shall any fires be lit, without the prior written consent of the Local Planning Authority. The fencing shall be maintained in accordance

with the approved details, until all equipment, machinery and surplus materials have been moved from the site.

17. The development hereby approved shall not commence until details of the design of a Surface Water Drainage Scheme have been submitted to and approved in writing by the Local Planning Authority. Those details shall include:
 - a) Detailed drawings of all the SuDS / drainage elements and layout;
 - b) Finalised drainage calculations showing that all storm events up to the 1 in 30 year storm event are contained within the drainage system and that the 1 in 100 year + CC storm event is suitably managed on site; Details of where any exceedance flows (i.e. rainfall greater than design or flows following blockages) would run to avoiding risks to people and property
 - c) Details of construction phasing, i.e. how drainage will be dealt with during works including pollution prevention
 - d) Details of the required maintenance regime for the suds elements and who will be responsible for maintenance

No discharge of foul or surface water from the site shall be accepted into the public system until the approved drainage works have been completed in full.

18. Prior to the first occupation of each phase of the development, a verification report carried out by a qualified drainage engineer must be submitted to and approved by the Local Planning Authority to demonstrate that the Sustainable Urban Drainage System, relevant to that phase, has been constructed as per the agreed scheme.
19. Prior to the first occupation of each phase of the development, details of the proposed maintenance regimes for each of the SuDS elements shall be submitted to and approved in writing by the Local Planning Authority. The development shall only be constructed and maintained in accordance with the agreed details.
20. No infiltration drainage shall take place within the site unless otherwise agreed in writing by the Local Planning Authority. Where infiltration drainage techniques / methods are approved, it shall be clearly demonstrated that there will be no adverse impact on surface or ground water quality. The development shall only be constructed and maintained in accordance with the agreed details.
21. The development hereby approved should not be commenced until Impact Studies of the existing water supply infrastructure have been submitted to, and approved in writing by the Local Planning Authority. The studies should determine the magnitude of any new additional capacity required in the system and a suitable connection point. The development shall only be carried out in full accordance with the agreed details.
22. The development hereby approved shall not commence until details have been submitted to and approved in writing by the Local Planning Authority, of how the developer intends to ensure the water abstraction source is not

detrimentally affected by the proposed development both during and after its construction.

23. Prior to the commencement of the relevant phase of the development hereby approved, details regarding the foundation / piling design shall be submitted to and agreed in writing by the Local Planning Authority. This shall include:
1. the methods to be used
 2. the depths of the various structures involved
 3. the geological strata upon which each type of structure will be founded
 4. the density of piling if used
 5. details of materials to be removed or imported to site
 6. a foundation and piling risk assessment to assess and address the risks associated with water quality

The development shall only be constructed in accordance with the agreed details.

24. The development hereby approved shall not commence until a scheme to further assess and address the risks associated with contamination of the site has been submitted to and approved in writing by the Local Planning Authority. The scheme shall comprise of:
1. A site investigation scheme, based on chapter H of the submitted Environmental Statement to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site. This must assess both the risks to groundwater and surface water quality during the construction phases and post-development phase.
 2. The results of the site investigation and detailed risk assessment referred to in element 1 (above) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.
 3. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in element 2 (above) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.
 4. Any changes to these components require the express written consent of the local planning authority. The scheme shall be implemented as approved.
25. Prior to the occupation of each phase of the development hereby approved, a verification report demonstrating completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved, in writing, by the Local Planning Authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include a plan (a "long-term monitoring and maintenance plan") for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified

in the verification plan. The long-term monitoring and maintenance plan shall be implemented as approved.

26. If, during development of each relevant phase, contamination not previously identified is found to be present at the site then no further development of that phase (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until the developer has submitted a remediation strategy to the Local Planning Authority detailing how this unsuspected contamination shall be dealt with and obtained written approval from the Local Planning Authority. The approved remediation strategy shall be implemented as approved.
27. The retail and commercial units hereby approved shall not be first opened for trading until the proposed Station Plaza works to include the provision of a pedestrian lift have been submitted to and approved in writing by the Local Planning Authority. These details shall include the type, size, design and location of the proposed bus and taxi shelters, the type design and location of the short term cycle parking and the detailed designs for the pedestrian lift. The development shall only be constructed in accordance with the agreed details which shall be maintained thereafter.
28. The proposed modifications to the vehicle accesses serving the Station Forecourt shall be constructed in accordance with the approved plan MBSK151127-1A and in compliance with a timescale to be agreed with the Local Planning Authority. Such accesses shall be provided with visibility zones in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority. Once approved the agreed visibility zones shall be kept permanently clear of any obstruction measured from 0.6m above the road surface.
29. Prior to the first use of the new station concourse or the first occupation of any dwelling the vehicle access serving the proposed car park and residential development shall be constructed in accordance with the approved plan MBSK151127-1A and shall be provided with visibility zones in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority. Once approved the agreed visibility zones shall be kept permanently clear of any obstruction measured from 0.6m above the road surface.
30. Prior to the commencement of development (excluding operations including site preparation, demolition, excavation and enabling works) a scheme for the proposed carriageway widening of Walnut Tree Close including the modification to the junction of Walnut Tree Close/Bridge Street, all as broadly indicated on plan MBSK151127-1A shall be constructed in compliance with a timescale to be agreed in writing by the Local Planning Authority and no later than the occupation of 289 dwellings. Such works shall be constructed wholly at the applicant's expense in accordance with the technical and road safety audit requirements of the Highway Authority (and shall include a road pedestrian crossing or what measures are required by the road safety audit).
31. Prior to commencement of development the proposed Residential Travel Plan and Station (staff and user, including retail and office use) Travel Plans forming part of the application shall be submitted to and agreed with the Local

Planning Authority in accordance with the requirements of the County Highway Authority. The Travel Plans shall include the measures and requirements set out in the consultation response of the County Highway Authority dated 11 December 2014.

32. Before the first occupation of the development hereby approved, a pedestrian and cycle waymarking improvement scheme within the site shall be submitted to and agreed in writing by the Local Planning Authority. Such scheme shall include a map, and pedestrian and cycle finger posts, to identify routes, journey times and distances to and from the immediate vicinity of the site and details of the phasing and installation of these measures. The approved scheme shall be installed in accordance with the approved details and kept in place thereafter.
33. The development hereby approved shall not be first occupied unless and until space has been laid out within the site in accordance with the approved plans for the relevant phase for (i) vehicles / cycles to be parked; (ii) for the loading and unloading of vehicles and; (iii) for vehicles to turn so that they may enter and leave the site in forward gear. Thereafter, the parking, loading and unloading and turning area(s) shall be retained and maintained for their designated purpose(s).
34. No development shall commence until a Construction Transport Management Plan, to include details of:
 - (a) parking for vehicles of site personnel, operatives and visitors
 - (b) delivery, loading and unloading of plant and materials
 - (c) storage of plant and materials
 - (d) programme of works (including measures for traffic management)
 - (e) provision of boundary hoarding behind any visibility zones
 - (f) HGV deliveries and hours of operation
 - (g) vehicle routing
 - (h) measures to prevent the deposit of materials on the highway
 - (i) before and after construction condition surveys of the highway and a commitment to make good any damage identified by the before and after construction surveys
 - (j) On-site turning for construction vehicles
 - (k) the phasing of the implementation of points (a) to (j) above

has been submitted to and approved in writing by the Local Planning Authority. Only the approved details shall be implemented during the construction of the development.

35. Before the occupation of the retail and commercial units hereby approved, a Servicing and Delivery Management Plan shall be submitted to and approved in writing by the Local Planning Authority. The development shall only be carried out in accordance with the approved details.
36. Prior to commencement of the development, a scheme setting out the hours of construction shall be submitted to and agreed in writing by the Local Planning Authority. The works related to the construction of the development hereby permitted, including works of demolition or preparation prior to building operations, shall be carried out in accordance with the agreed scheme.

37. Prior to the first occupation of any of the dwellings hereby approved a scheme showing how the occupants will be protected from noise emanating from the nearby commercial operation and railway operation shall be submitted to and agreed in writing by the local planning authority. The development shall be carried out in accordance with the approved scheme.
38. Before the first use commences, the retail units should be insulated in accordance with a scheme submitted to and agreed in writing by the Local Planning Authority. Such a scheme should take into account the operational noise levels allowed for the units.
39. The level of noise emitted by all fixed plant on the site shall not exceed a rating level of 5 dB below the minimum background noise level LA90,5 minutes at the nearest noise sensitive premises or representative measurement position. The noise levels shall be determined at the nearest existing noise sensitive properties to the development. The measurements and assessment shall be made according to BS4142:1997.
40. Prior to first occupation of each of the non-residential parts of the Development buildings hereby approved, a BREEAM Final (Post-Construction) Certificate, issued by the BRE (or equivalent authorising body), must be submitted to the Local Planning Authority and approved in writing to demonstrate that a Very Good rating has been achieved for each non-residential building, unless otherwise agreed in writing, for the non-residential part of the development. All the measures integrated shall be retained for as long as the development is in existence.
41. The residential units of the development hereby permitted must comply with regulation 36 paragraph 2(b) of the Building Regulations 2010 (as amended) to achieve a water efficiency of 110 litres per occupant per day (described in part G2 of the Approved Documents 2015). Before occupation, a copy of the wholesome water consumption calculation notice (described at regulation 37 (1) of the Building Regulations 2010 (as amended)) shall be provided to the planning department and agreed in writing to demonstrate that this condition has been met, unless otherwise agreed in writing by the Local Planning Authority.
42. The energy efficiency and carbon emission reduction measures as detailed in the submitted Energy Statement (prepared by Hurley Palmer Flatt, Reference WED04596R and dated September 2014 and October 2015) shall be implemented in full in each phase area prior to the first occupation of each phase of the development and retained as operational thereafter, unless otherwise agreed in writing by the Local Planning Authority.
43. Notwithstanding the Town and Country Planning (General Permitted Development) (England) Order, the units hereby approved for A1, A2, A3 and D2 purposes shall only to be used for these uses and no other purpose.
44. No A1 retail unit in the development shall exceed 850 square metres (GIA) in floorspace.

APPEARANCES

FOR THE LOCAL PLANNING AUTHORITY:

Ms Morag Ellis QC and
Mrs Anabelle Graham-Paul of
Counsel

They called

Mr Richard Coleman Dip Arch (Cant) ARB RIBA RIAI

Mr Joe Ellis CEng MICE MCIHT

Mr Kevin Goodwin BA TP MRTPI

FOR THE APPELLANT:

Mr Russell Harris QC

He called

Dr Christopher Miele BA MA PHD IHBC MRTPI

Mr Euan MacGillivray ARB RIBA RIAI

Mr Steven Butterworth BA TP MA MRTPI

Mr Ian Campbell Mitchell BSc MSc MCILT

INTERESTED PERSONS:

Ms Gemma Roulston -
Guildford Access Group (GAP)
& Surrey Coalition of Disabled
People (SCDP)

Mrs Diana Lockyer-Nibbs -
GAP & SCDP

Mr Douglas Clare - cycling
improvements

Mr John Rigg, Guildford Vision
Group (GVG)

Mr Julian Lyon, Chair The
Guildford Society (GS)

Mr Robert Benjafield -
Resident

Documents submitted at the Inquiry

1. Appearances for the Appellant
2. Draft Statement of Common Ground (SoCG)
3. Submissions by the Guildford Society (GS)
4. Appendices GS
5. Prof of evidence J Lyon GS
6. Further appendices GS
7. Submissions Guildford Vision Group including plan document (GVG)
8. Appendices GVG
9. Night skyline view Guildford Borough Council (GBC)
10. Townscape sketch amendment GBC
11. Google collection of photographs GBC
12. Opening submissions- Appellant
13. Opening submissions GBC
14. Appearances GBC
15. Statement Mr Benjafield
16. Additional submissions GVG
17. Swept path analysis Appellant
18. Employment generation estimates Appellant
19. Signed SoCG Appellant
20. Draft unilateral undertaking Appellant
21. Draft conditions Council
22. Aerial photographs of station/river Appellant
23. Red line extract – GS
24. Station survey extract GS
25. Design panel document Appellant
26. Technical note in response to GAP submissions
27. Proposals extracts GS
28. Guildford Town Centre Transport Package document GVG
29. Letter Office of Rail and Road – GVG
30. Network Rail response to above Appellant
31. Closing submissions GBC
32. Bedford case (CO/9953/2012) GBC
33. Mordue case (C1/2015/1067) GBC
34. Closing submissions Appellant
35. Section 106 explanatory note
36. Signed and dated section 106 Agreement and unilateral undertaking