

Topic Paper: Employment

December 2017

To accompany the Guildford borough Submission Local Plan: strategy and sites



Alternative formats

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Topic Paper:

1. Purpose of this topic paper

- 1.1 This topic paper is one in a series, which sets out how we have developed the key strategy within the Guildford borough Submission Local Plan: strategy and sites document. Each topic paper will look at the relevant national and local guidance that informs the proposed submission Local Plan. Topic papers explain how the strategy has developed, in addition to the information, evidence and feedback that have informed the choices made in formulating the policies.
- 1.2 The intention of the topic papers is to provide background information; they do not contain any policies, proposals or site allocations. Topic papers have been produced to accompany the Submission Local Plan to the Secretary of State for examination.
- 1.3 The main areas covered by this topic paper are:
 - Functional Economic Market Area (FEMA)
 - Employment Land Assessment (2013 and 2014) and Employment Land Needs Assessment (2015 and 2017)
 - Permitted Development Rights
 - Sequential Approach
 - Hierarchy
 - Quality
 - Marketing
 - Surrey Research Park

Definition

- 1.4 In the Local Plan, 'employment land' includes all commercial and industrial uses falling into use classes B1 (a, b and c), B2 and B8 of the Use Classes Order 1987 (as amended). 'Employment land' does not include land and/or buildings used for health, education, [retail](#) or [tourism and leisure](#) purposes (some of which are covered in other evidence base documents and topic papers). The term also excludes offices that fall into the A2: Financial and Professional Services use class. Short descriptions of the B use classes are shown in the table below.

Employment Land B-Use Class Descriptions

<i>Use Class</i>	<i>Description</i>
B1: Business	
B1a	Offices (other than those that fall within A2: Financial and Professional Services)
B1b	Research and development of products and processes
B1c	Light industry – for industrial process (compatible with residential areas)
B2: General Industrial	Use for industrial process other than one falling within class B1 (excluding incineration purposes, chemical treatment or landfill or hazardous waste)
B8: Storage or distribution	This class includes warehouses and open-air storage

2. Policy Context

National context

2.1 Local Plan policies must be positively prepared, justified, effective, and consistent with national policy and legislation. The [National Planning Policy Framework](#) sets out the overarching planning policy framework, supported by [National Planning Practice Guidance](#).

2.2 The National Planning Policy Framework (paragraphs 14, 18 to 22, 23 to 27, 28, 160-161 and 182) requirements for employment land are summarised in the following bullet points.

18. The Government is committed to securing economic growth in order to create jobs and prosperity, building on the country's inherent strengths, and to meeting the twin challenges of global competition and of a low carbon future.

19. The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore, significant weight should be placed on the need to support economic growth through the planning system.

20. To help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century.

21. Investment in business should not be over-burdened by the combined requirements of planning policy expectations. Planning policies should recognise and seek to address potential barriers to investment, including a poor environment or any lack of infrastructure, services or housing. In drawing up Local Plans, local planning authorities should:

- set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth;*
- set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;*
- support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances;*
- plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries;*
- identify priority areas for economic regeneration, infrastructure provision and environmental enhancement; and*
- facilitate flexible working practices such as the integration of residential and commercial uses within the same unit.*

22. Planning policies should avoid the long-term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use,

applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.

23. Planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period. In drawing up Local Plans, local planning authorities should:

- allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres. It is important that needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability. Local planning authorities should therefore undertake an assessment of the need to expand town centres to ensure a sufficient supply of suitable sites;*
- allocate appropriate edge of centre sites for main town centre uses that are well connected to the town centre where suitable and viable town centre sites are not available. If sufficient edge of centre sites cannot be identified, set policies for meeting the identified needs in other accessible locations that are well connected to the town centre;*
- set policies for the consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres;*

24. Local planning authorities should apply a sequential test to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan. They should require applications for main town centre uses to be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered. When considering edge of centre and out of centre proposals, preference should be given to accessible sites that are well connected to the town centre. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale.

25. This sequential approach should not be applied to applications for small scale rural offices or other small scale rural development.

28. Planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. To promote a strong rural economy, local and neighbourhood plans should:

- support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well designed new buildings;*
- promote the development and diversification of agricultural and other land-based rural businesses;*
- support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside. This should include supporting the provision and expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities in rural service centres; and*
- promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.*

160. Local planning authorities should have a clear understanding of business needs within the economic markets operating in and across their area. To achieve this, they should:

- work together with county and neighbouring authorities and with Local Enterprise Partnerships to prepare and maintain a robust evidence base to understand both existing business needs and likely changes in the market; and
- work closely with the business community to understand their changing needs, and identify and address barriers to investment, including a lack of housing, infrastructure or viability.

161. Local planning authorities should use this evidence base to assess:

- the needs for land or floorspace for economic development, including both the quantitative and qualitative needs for all foreseeable types of economic activity over the plan period, including for retail and leisure development;
- the existing and future supply of land available for economic development and its sufficiency and suitability to meet the identified needs. Reviews of land available for economic development should be undertaken at the same time as, or combined with, Strategic Housing Land Availability Assessments and should include a reappraisal of the suitability of previously allocated land;
- the role and function of town centres and the relationship between them, including any trends in the performance of centres;
- the capacity of existing centres to accommodate new town centre development;
- locations of deprivation which may benefit from planned remedial action; and
- the needs of the food production industry and any barriers to investment that planning can resolve.

2.3 The [Localism Act 2011](#) places a legal duty to cooperate on all councils. The duty extends to prescribed bodies and neighbouring councils on strategic and cross boundary issues, which includes housing need.

2.4 The National Planning Policy Guidance gives advice on [housing and economic development needs assessments](#) and [housing and economic land availability assessments](#). Within the Housing and Economic Land Availability Assessment methodology (Ref 3-006-20140306), we were advised to consider “economic development on sites of 0.25ha (or 500m² of floor space) and above”.

Local context

2.5 An overarching local approach to employment land is set out in the Guildford borough [Corporate Plan 2015 to 2020](#). Under the theme of Our Economy the priorities are:

- providing economic leadership to deliver sustainable and proportionate growth,
- maintaining and growing our business base,
- promoting innovation and growth in high value clusters,
- providing for high quality commercial land and buildings,
- improving skills and employment opportunities,
- building strong links and leveraging synergies between public, private and third sectors,

- reinforcing and improving local community facilities, particularly in the villages, to improve services and shops, with parking availability being critical, and
- unlocking the economic advantages of urban regeneration.

Neighbourhood Plans

- 2.6 Neighbourhood Planning enables Neighbourhood Forums and Parish Councils to develop a plan setting out a vision and planning policies for their designated neighbourhood area. Those 'Neighbourhood Plans' which are successfully adopted will form part of the statutory development plan for the area that they cover. Where a Neighbourhood Plan is adopted or emerging before an up-to-date Local Plan is in place, the local planning authority should take it into account when preparing Local Plan policies.
- 2.7 There is currently one adopted Neighbourhood Plan (Burpham), one emerging, post-examination Neighbourhood Plan (Effingham), and one progressing towards examination (East Horsley) within the borough. Six other Parish Councils are also currently producing Neighbourhood Plans.
- 2.8 Burpham Neighbourhood Plan includes three policies that deal with employment: B-EMP1, B-EMP 2 and B-EMP 3, although only two apply to employment in the context of the Local Plan as the other relates to shopping parades. These policies support home working and protect existing employment accommodation. There is a small conflict between the approach outlined in Local Plan Policy E3 and Policy EMP-3: Business accommodation. EMP-3 requires:
- "The loss of any employment accommodation will be strongly resisted. Proposals for alternative uses must be accompanied by marketing information to demonstrate that the premises have not been in active use for at least 6 months and have been actively and prominently marketed for Class B use for 9 months prior to any application for change of use or re-development".*

Policy E3 of the Local Plan requires a longer period of marketing:

- (1) ... *Redevelopment or change of use to a non-employment use will only be acceptable if evidence is provided of active and comprehensive marketing of the site for its current use for a continuous period of at least:*
 - a) *two years for a Strategic Employment Site; or*
 - b) *18 months for a Locally Significant Employment Site**prior to submission of a planning application.*
- (2) ...*Redevelopment or change of use to a non-employment use will only be acceptable if evidence is provided of active and comprehensive marketing of the site for its current use for a continuous period of at least 12 months prior to submission of a planning application.*
- (3) ...*Once the period of comprehensive and active marketing is complete, another suitable B class employment use should be considered, followed by any other employment generating use, before change of use to residential or other use with no on-going employment use will be permitted.*

However, there are no Strategic Employment Sites in Burpham and no identified Locally Significant Employment Sites, although the list is not comprehensive. The small conflict concerns the requirement for nine months marketing in the Burnham's Neighbourhood Plan, versus 12 months in the Local Plan, and also the requirement that *"another suitable B class employment use should be considered, followed by any other employment generating use, before change of use to residential or other use with no on-going employment use will be permitted"*. However, the difference of three months is minor and both policies work to achieve the same result. The Local Plan considers the borough as a whole, whereas the Burpham Neighbourhood Plan acknowledges

"Business accommodation within Burpham is extremely restricted. Only three existing locations have been identified in London Road, New Inn Lane, and Burpham Lane" (p16).

- 2.9 No other conflicts have been identified between the approach outlined in Policies E1 to E5 and the Burpham Neighbourhood Plan.
- 2.10 The East Horsley Neighbourhood Plan includes four policies that deal with the economy, of which three relate to employment: EH-LE2, EH-LE3 and EH-LE4 and the other relates to Retail Centres. These policies support small-scale offices and workshops, and development of a site at Newmarsh Farm provided that it accords with Green Belt policy.
- 2.11 There is a small conflict between the approach outlined in Local Plan Policy E2 and Policies: EH-LE2: Small-scale offices & workshops, and EH-LE3: Horsley Station public transport interchange. Both policies in the East Horsley Plan set thresholds of a maximum of 350 square metres in total floor space whilst Local Plan Policy E2 does not set any thresholds. Appropriate scale of development would be considered as part of the planning application process on a case-by-case basis and in conformity with Policy D4: Character and design of new development.
- 2.12 It is considered that there are no other conflicts between the approach outlined in Policies E1 to E5 and the East Horsley Neighbourhood Plan.
- 2.13 It is considered that there are no conflicts between the approach outlined in Local Plan Policies E1 to E5 and the emerging Effingham Neighbourhood Plan.
- 2.14 The weight given to an emerging plan will depend on, among other things, the extent to which there are unresolved objections to the plan (NPPF paragraph 216). Therefore, an emerging neighbourhood plan will pick up weight once evidence of consultation is published and the level of unresolved objection is known. At time of writing, the Effingham Neighbourhood Plan has been through examination, which has resolved any remaining objections, and is progressing towards a referendum. The East Horsley neighbourhood plan is progressing towards examination and is accorded very little weight at this stage.
- 2.15 Details are available at www.guildford.gov.uk/neighbourhoodplanninginformation.

3. Evidence base

3.1 The National Planning Policy Framework requires us to develop policies based on up to date evidence. Our evidence base comprises documents that have helped inform past and current stages of our Local Plan policy development; emerging evidence will help inform future development of policies for the Local Plan.

3.2 The key piece of evidence relevant to employment:

- [Employment Land Needs Assessment \(ELNA\) 2017](#)

Other relevant evidence includes:

- [Guildford borough Economic Strategy 2013-2031](#)
- [Corporate Plan 2015-2020](#)
- [Enterprise M3 Strategic Economic Plan - 2014](#)
- [Employment Land Needs Assessment \(ELNA\) 2015](#)

3.3 Further information and copies of the evidence base documents are available on the Councils website at: www.guildford.gov.uk/researchandevidence

4. Appraisal

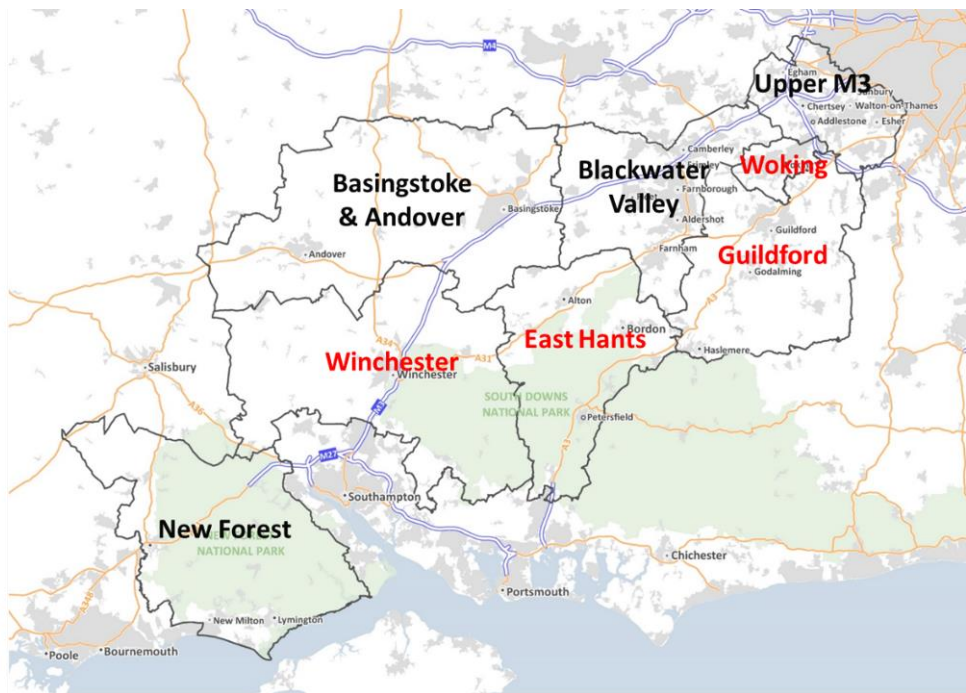
- 4.1 The following section brings together relevant legislation and key evidence base findings where appropriate. It highlights the main areas relevant to formulating a Local Plan policy approach for employment land in our borough.

Planning for employment land

Functional Economic Market Area

- 4.2 National policy states that the Council should plan “proactively to meet the development needs of business and support an economy fit for the 21st century” (NPPF, paragraph 20). The Planning Practice Guidance provides details on housing and economic development needs assessments. The need for economic development floorspace should be based on quantitative assessments and the qualitative requirements of each market segment.
- 4.3 The Guidance tells us to work with the other local authorities in the relevant Functional Economic Market Area (FEMA) to assess development needs. Guildford borough is part of the West Surrey functional economic market area along with Woking and Waverley boroughs. During February and March 2016, we consulted all local authorities that border the three boroughs, plus the County Council, and Enterprise M3 LEP on the definition and methodology of the FEMA.
- 4.4 We received a small number of responses, most of which requested minor amendments to the FEMA document. The most significant responses related to the first draft of the 2016 update of the Enterprise M3 Commercial Property Market Study by Regeneris, which identified that Guildford and Woking now operate as separate property market areas and that it cannot be assumed that a shortage of commercial space in Guildford can be addressed in Woking. In the 2013 report, they were in the same market area.

Figure 4.2 Revised Market Areas



Source Regeneris Consulting: Enterprise M3 Commercial Property Market Study, 2016

- 4.5 Published in July 2016, the report does not suggest that Woking or Guildford boroughs more strongly relate to any other commercial property market area. The previous area has simply been split, leaving the majority of Guildford and Waverley boroughs combined and Woking borough alone. This revised version states:

“A final point is that this conclusion relates to the commercial property market area of Guildford and Woking and not the functional economic market area (FEMA), which LPAs are required to define in NPPF. Although commercial property markets are one criteria that LPAs need to consider when defining their FEMA, PPG states that a number of other criteria should be considered including the housing market area (e.g. migration and travel to work patterns), service markets for consumers and the catchment areas of facilities providing cultural and social well-being. None of these factors have been considered when determining the commercial property market area for Guildford and Woking”.

(Enterprise M3 Commercial Property Market Study, 2016, paragraph 5.12).

- 4.6 Given the support for the FEMA, by paragraph 5.12 of the 2016 Study, we are comfortable that the report’s split of the commercial property market of Woking and Guildford does not have significant implications for the identification of Woking, Waverley and Guildford boroughs as the West Surrey FEMA. Guildford and Waverley boroughs remain in the same commercial property market area and Woking borough has not be joined with any other boroughs so is not shown to have stronger relationships with any other boroughs than it has with Guildford and Waverley.

Employment Land Needs Assessment (ELNA) 2017 and previous ELNA 2015 and Employment Land Assessments (ELA) 2013 and 2014

- 4.7 Our Employment Land Needs Assessment (ELNA) was originally published in October 2015, with an updated version in March 2017. Consultants AECOM produced both assessments. The assessments update the Employment Land Assessment (ELA) published by Guildford Borough Council in July 2013 and the unpublished 2014 ELA that fed into the draft Local Plan 2014.
- 4.8 Each dataset is supplemented by a technical report, which presents information on the approach used. These technical reports are provided at Appendix 1 to the ELNA. AECOM believe that the three forecasts are “robust and suitable for projecting change over the long term in Guildford”. They took a mean average of the compound annual growth rates of three employment forecasts and projected the growth from a 2015 baseline. The baseline was derived from the 2012 VOA floorspace data, which was updated with monitoring data from the Council on net changes to the floorspace 2012 to 2016.
- 4.9 Both the 2017 and 2015 ELNA used the same methodology to determine how much land is required over the plan period. The methodology used in these assessments is different from that used in the previous ELAs. Three independently derived projections of future workplace employment were used to forecast employment change. The 2017 ELNA considered the change between 2016 - 2034:
- Cambridge Econometrics Employment Projections, November 2016 (Cambridge Econometrics);
 - UK Local Market Forecasts, December 2016 (Experian); and
 - Local Authority District Forecasting Model, November 2016 (Oxford Economics).
- 4.10 To calculate the employment land required over the plan period, AECOM looked at how floorspace and employment rates have changed over the recent past, and assume a continuation of their changing dynamics over the plan period. They looked at the property market area (PMA) (this is what they call the FEMA) as a whole. The ratio between historic floorspace and employment growth was applied to the future employment forecast to estimate how much floorspace would be needed. If employment has historically grown faster than floorspace (i.e. density has increased), we would expect future employment to grow faster than future floorspace. For further details, please see section 6 of the ELNA.
- 4.11 For comparison the 2013 ELA considered four economic forecasts, three for employee demand and one for employee supply. The employee demand used a forecast of the number of employees that will be needed by companies within the borough during the plan period.
- One forecast was produced in a period of economic stability and prosperity (2007¹),

¹ The forecast rolls forward the Experian employment series from 2006 using the five-year sectoral employment growth forecasts contained in Working Futures 2007-2017 report. The Warwick Institute undertook working Futures research in 2008 for the UK Commission for Employment and Skills for Employment Research. There was additional input from Cambridge Econometrics. The original forecast was undertaken for 2007-2017. This was then projected to 2026 and then we have rolled it forward using the compound annual growth figures (CAG) to 2031.

It was assumed that 80% of released B2 use class land would be retained for other B use class uses.

- One during a period of economic decline (Experian, spring 2010), and
- One mid-range forecast between the two has been calculated.

In addition, there was the employee supply forecast based on the Office of National Statistics (ONS) 2010 mid-year population estimates. The mid-range employee demand forecast was the one taken forward. To translate the number of employees into floorspace, an average estimate of floor space per employee ratio was used.

- 4.12 The unpublished 2014 ELA used the three employee demand forecasts, exactly as in the 2013 ELA and added an additional employee demand forecast based on Experian 2014 data, published after the 2014 Budget. This is the one taken forward and translated into floorspace requirements using the average estimate of floor space per employee ratio as in 2013.
- 4.13 The 2014 ELA remained unpublished because of concerns expressed about the methodology. The most up-to-date economic projections were Experian 2014, which were taken forward but there were concerns about the high level of growth expressed in it. Following the consultation responses, AECOM were appointed to revise the document and use three separate projections to ensure a robust approach.
- 4.14 Table 1 (below) shows the comparison of the employment floorspace needs between the three ELA/ELNA to over the plan period. The difference between the 2013 figures, and those from 2014 and 2015, is predominantly driven by the use of different forecasts. The difference between the 2014 and 2015 figures is driven both by the use of different forecasts and by the different methodology for translating the forecasts into the need for floorspace. Whilst the 2013 and 2014 ELA used Surrey specific employment density floorspace figures, similar to those shown in table two, to translate the forecast number of employees into the amount of floorspace needed, AECOM compared the historic change in number of employees and the change in floorspace to provide a ratio which they used to forecast floorspace.
- 4.15 An estimate for the net additional floor space required has been calculated by multiplying the forecast change in the number of workers by the amount of floor space (measured in sq m per worker). This has been done for each of the three use classes. An approximate gross floor space figure, which takes account of factors such as external and internal walls, could be calculated by multiplying the net floor space figure by 1.05 to reflect the fact that approximately 5 percent of usable floor space is lost.

Table 1: Comparison of the 2013 and 2014 ELA, and 2015 and 2017 ELNA

	2013 ELA	2014 ELA (unpublished) Included in Draft Local Plan	2015 ELNA	2017 ELNA
Total B class	10.5 – 20 ha	21.6 – 29.2 ha	-	-
B1a and b	6.5 – 11 ha	11.3 – 15.3 ha	37,200 – 47,200 sq m	36,100 – 43,700 sq m
B1c, B2 and B8	4 – 9 ha	8.3 – 13.9 ha	4.7 – 5.3 ha	3.7 – 4.1 ha

- 4.16 Need for industrial/storage land is forecast to increase by between 3.7ha and 4.2ha in the period from 2015 to 2034. The central (medium) forecast for Guildford predicts a net need for industrial land of approximately 5.0ha between 2015 and 2033, equivalent to an additional 0.3ha per annum.
- 4.17 There is approximately 325,200sq m of gross office/R&D (B1a/b) floorspace in Guildford, of which approximately 6.5% is vacant. It is forecast that there will be a need for between 36,100sq m to 43,700 sq m up to 2034. The central case of the forecast puts net demand for office floorspace at approximately 39,800 sq m over the period, equivalent to an additional 2,100sq m per annum.
- 4.18 Given that it is based on three up-to-date employee forecasts and that these have been translated into floorspace using AECOMs formula, we are confident that the 2017 ELNA provides the most robust and up-to-date information currently available to the objectively identified needs for employment floorspace in Guildford borough over the plan period. The Local Plan seeks to meet the needs identified.

Special cases

- 4.19 Policy E1 includes targets for both the number of jobs needed over the plan period and the amount of floorspace. This is to provide some flexibility in case there are large changes to working practices over the plan period and the ratio of floorspace to worker changes significantly, or to take into account other special circumstances. The latest job density guidelines from the Homes & Communities Agency (HCA)² suggest 40-60 sq m of floorspace per full-time worker for research and development (B1b) (see table 2). This is much higher than the density of offices (B1a).

Table 2: Employment density matrix

Use Class	Sub-Category	Sub-Sector	Density (sqm)
B1a Offices	General Office	Corporate	13
		Professional Services	12
		Public Sector	12
		TMT	11
		Finance and Insurance	10
	Call Centres		8
B1b	Research and development space		40-60

Source: HCA 2016

- 4.20 One example of special circumstances in the borough is the Pirbright Institute. Due to the nature of their work, a recent masterplan, which was part of an outline planning permission granted in July 2016 (15/P/00604), showed they planned for around 74,000 sq m of floorspace to employ 917 people (net gain 24,000 sq m). (However, some of this may be ancillary facilities). If all of the floorspace were for B1b use, this would mean an average of 81 sq m per employee. The actual ratio could be higher as the number of employees is not believed to have been equated to full-time equivalents. If planning permission were to be granted for expansion on this site, it would be important to monitor both the number of employees and the amount of floorspace, as the number of people is likely to be fewer than standard ratios would suggest. Therefore, the impact of the development, such as trip generation, will be less than other B1b uses and certainly less than other B1a uses. The Local Plan

²https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/484133/employment_density_guide_3rd_edition.pdf

monitoring will track both the number of jobs and amount of floorspace to ensure the floorspace provided will meet the forecast job needs.

Table 3: Recent completions at the Pirbright Institute

Building	Size	Staff	Notes
Plowright Building High Containment Laboratory	14,000 sq m	150	93 sq m per employee Opened early 2015
Jenner Building	3,700 sq m	100	37 sq m per employee Officially opened March 2017

Permitted development rights

4.21 In 2013, permitted development rights were introduced, which enabled offices (B1a) to be converted to residential use (C3 use) without having to apply for planning permission. Applicants only needed to apply to the Council for prior approval in relation to flooding, highways, transport, and contamination impacts. It was initially proposed that this would expire after three years but became permanent in April 2016. A new three-year temporary permitted development right for the change of use from light industrial to housing has also been created, up to a maximum floorspace of 500 sq m.

4.22 As a result of the permitted development rights, a significant amount of office floorspace has been lost, particularly in Guildford town centre. This is in addition to employment floorspace lost over the years because of the higher land values achieved through residential development. As a result of these losses, and also the projected need for employment floorspace over the plan period, Policy E3 seeks to protect floorspace to accommodate existing and future demand.

Table 4: Office floorspace lost through permitted development from April 2013 to December 2016

Status of planning application	B1a lost (sq m)
Completed	-3,134
Commenced	-1,756
Approved	-11,352
Total	-16,242

Source GBC: January 2017

Table 5: Office floorspace lost through permitted development from April 2015 to March 2016

Status of planning application	B1a lost (sq m)
Completed	-3,441
Commenced	-3,296
Approved	-7,864
Total	-8,009

Source GBC: December 2017

- 4.23 The figures from 2015-2016 include some double counting in more than one category as some sites have been approved / completed / commenced within the same reporting year.

Table 6: Office floorspace lost through permitted development April 2016 to October 2017

Status of planning application	B1a lost (sq m)
Completed	-1, 380
Approved	-1,282
Total	-2,662

Source GBC: December 2017

- 4.24 An article 4 direction is a direction under article 4 of the General Permitted Development Order, which enables the Secretary of State or the local planning authority to withdraw specified permitted development rights across a defined area (PPG, paragraph 036). The Council is planning to introduce an Article 4 direction into both the Town Centre Employment Core and Surrey Research Park, to remove the permitted developments rights for a change of use of a property from class B1(a) office use to class C3 residential.
- 4.25 Introduced in 2013, Permitted Development (PD – or Prior Approval) rights were intended to be a temporary policy. This produced an initial flurry of applications but we anticipate that the rate of applications coming forward will slow down as a number of the ‘easy wins’ have already come forward as a matter of urgency. Permitted development rights have been considered in the ELNA (paragraphs 2.2.8 - 2.2.9 and 4.5.5). The medium and long-term forecasts for the impact are difficult to predict. However, the loss of employment floorspace through permitted development rights and through other planning permissions will be carefully monitored in order to assess the impact over the Plan period. If loss continues at the rate of the previous few years, further sites may need to replace those lost in order to meet identified employment needs over the Plan period.

Sequential approach

- 4.26 Paragraph 23 of the NPPF states: Planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period. In drawing up Local Plans, local planning authorities should:
- *“...allocate appropriate edge of centre sites for main town centre uses that are well connected to the town centre where suitable and viable town centre sites are not available. If sufficient edge of centre sites cannot be identified, set policies for meeting the identified needs in other accessible locations that are well connected to the town centre”;*

Paragraph 24 says:

“Local planning authorities should apply a sequential test to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan. They should require applications for main town centre uses to be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered”.

4.27 The NPPF Glossary states:

“Edge of centre: For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances”.

4.28 From December 2015 to February 2016, the Government consulted on changes to the NPPF. One of the proposed changes affected residential development around commuter hubs. Currently, local planning authorities set appropriate density levels to reflect local circumstances, but the government wants to encourage development around new and existing commuter hubs, increasing the *density* *“to make more efficient use of land in suitable locations”*. They proposed to define a commuter hub as:

- a) a public transport interchange (rail, tube or tram) where people can board or alight to continue their journey by other public transport (including buses), walking or cycling; and*
- b) a place that has, or could have in the future, a frequent service to that stop. We envisage defining a frequent service as running at least every 15 minutes during normal commuting hours.*

4.29 In an article in Planning Resource (8 January 2016), concern was expressed by former Chief Planning Inspector Chris Shepley that the term was not exact enough and would cause a great deal of debate at examination. Particularly outside London, landowners might argue that *“quite minor or even remote places should be included and that high densities should be permitted”*. He went on to say that:

“In a town, almost everywhere has or might have a ‘service’... running to ‘that stop’ every 15 minutes. Bus routes very often run at that frequency. Does that mean that every bus stop can be regarded as an interchange? Obviously not, but the careless wording could easily lead to such an argument being put”.

4.30 In the Local Plan, we define transport interchanges as rail stations and bus stations, concentrations of three or more bus stops on-street, and bus hubs with three or more bus stops, within the urban areas, district and local centres:

Train stations:

- Guildford
- London Road (Guildford)
- Ash
- Ash Vale
- North Camp
- Horsley

When developed, the new Guildford East and Guildford West train stations will be treated as transport interchanges.

The following train stations have been excluded from the definition:

- Clandon
- Chilworth
- Effingham junction
- Gomshall
- Shalford

- Wanborough

These stations have been excluded because of their location either within the Green Belt or AONB; or because of the nature, character and size of the surrounding village or centre. We do not consider that it is sequentially preferable, sustainable or appropriate to direct office development over 100 sq m to these locations.

- 4.31 We received a considerable number of representations during the 2016 consultation, requesting that Effingham Junction be classified as a transport interchange. The station was reconsidered and a further site visit undertaken, but because of the small number of commercial premises around the station and the predominantly residential nature and character of the area, we do not consider that it is sequentially preferable, sustainable or appropriate to direct office development over 100 sq m here. Therefore, the station will not be classified as a transport interchange.

Bus stations:

- Guildford town centre

If the bus station in Guildford town centre is replaced on site, or by a suitable alternative arrangement to be located partly or wholly either on or off site, this will be defined as a public transport interchange.

- 4.32 All transport interchanges are shown on the Policies Map and the 500m buffer around the interchange is shown on the maps included in Appendix A1.
- 4.33 Transport interchanges do not include stand-alone bus stops or park and ride locations.

Hierarchy

- 4.34 As set out in Policy E2, the preferred location for office (B1a) and research and development floorspace (B1b) is in Guildford town centre, district and local centres, then to edge of centre locations which we define as those within 500m of a public transport interchange (see section above). The next sequentially preferable location comprises the Office and Research & Development Strategic Employment Sites, unless the floorspace is of limited scale or meets the criteria set out in Policy E4 and is appropriate to be located on Surrey Research Park.
- 4.35 Some flexibility has been introduced to the policy to allow for small-scale development. If the proposed floorspace is limited in scale (less than 200 sq m, or 25% of the existing office/R&D floorspace, whichever is lower) and/or ancillary to the primary use of the site then the sequential test does not need to be applied.
- 4.36 Proposals for industrial and storage development are directed by the Local Plan to the strategic industrial sites and the sites identified in the LAA. This helps to avoid conflicting uses, particularly with residential, and ensures most of the existing sites have good access to the strategic transport network.
- 4.37 Policy E2 has been amended to also allow a level of development on the Locally Significant employment sites. These are defined in the policy but have been identified because of their size, clustering or importance to the rural area and support of the rural economy.

Guildford town centre

- 4.38 Guildford town centre is a sustainable location for development, at the top of our spatial hierarchy. However, there are few sites available for office (B1a) floorspace development in the town centre. Allocated sites provide that the town centre is likely to generate just 3,000 sq m of floorspace, on one site (77 to 83 Walnut Tree Close), within the Plan period. This is a change of use within B class uses. The quantum of floorspace provided is less in Guildford town centre in the Submission Local Plan than in previous iterations. This is due to sites becoming confirmed as being available for housing rather than employment (York House, Chertsey Street; Jewsons, Walnut Tree Close; Buryfields House), or confirmed as unavailable for development within the Plan period (Telephone Exchange, Leapale Road).
- 4.39 In addition, a re-appraisal of sites has been undertaken in light of flood risk (See details in Housing type, tenure and mix topic paper). This re-appraisal has affected the availability of some sites for office floorspace development (Portsmouth Road surface car park and Land at Bedford Road for example). Some sites have also since been developed, or work has commenced, for example 1-2 Station View and Pembroke House. The sites where work has started (or completed), are counted as part of the monitoring and will contribute towards meeting the need identified in the ELNA but no longer count as future supply in terms of LAA sites/allocations.
- 4.40 Over the plan period, more sites may become available for development and the town centre will remain the first location of search.

Office (B1a/b) Strategic Employment Sites

- 4.41 The Strategic Employment Sites were identified in the ELNA. These sites are all larger than 15ha and all have at least 7,000 sq m of employment floorspace, though most have more than 10,000 sq m of floorspace. Together the sites make up more than 170ha of employment land and more than 500,000 sq m of employment floorspace.

Blackwell Farm

- 4.42 This site was originally identified in the draft Local Plan (2014) and remains a proposed allocation. Details of the site, including the exceptional circumstances that justify removing it from the Green Belt, are provided in the Housing Delivery Topic Paper and it is not intended to repeat these here.
- 4.43 The site will provide a significant expansion of the Surrey Research Park of up to 11ha, which is key to meeting our OAN for employment. It is also a unique opportunity to expand the 28 hectare Research Park, one of our key Office Strategic Employment Sites, providing around 65,000 sq m of floorspace and home to around 110 companies, which will enable us to build on our knowledge-based employment sector that is of regional significance.
- 4.44 The original outline planning permission for the Research Park included a restriction limiting use to “research, development and design activities, in any science, including social science, that is complementary to the activities of the University of Surrey”. This has ensured the site has remained focused on knowledge-based industry over the last thirty years and it is vital to retain this focus. The strength of the Surrey Research Park is the specialist research and development offer, which is set in an attractive location, with good access to a well-qualified work force. It provides a unique facility in the wider South East and is estimated to contribute between £450m

and £625 million to the regional economy. This type of specialist employment could not be provided elsewhere in the borough.

- 4.45 A specialist Surrey Research Park policy (E4) has been included in the plan.
Gosden Hill Farm
- 4.46 This site was identified in the draft Local Plan (2014) and remains a proposed allocation. Details of the site, including the exceptional circumstances that justify removing it from the Green Belt, are provided in the Housing Delivery Topic Paper and it is not intended to repeat these here.
- 4.47 The site will provide 2,000 homes, 1700 of which will be in the plan period, and a new strategic employment site, in addition to other uses. The site will provide 4-5 ha of land for B class employment use split over two zones, which will be 2 - 2.5ha each. The employment floorspace will be high quality, including a 7,000 sq m B1 prime business headquarters to the north of the site, in a prominent location alongside the A3. In the southern part of the site, located close to the proposed Guildford East station, there will be approximately 3,000 sq m of employment floorspace that will include incubator units. The floorspace on the southern part of the site is likely to be delivered as part of a mixed-use Local Centre.

Send Business Centre and Tannery Studios, Tannery Lane, Send

- 4.48 A 1.4ha site in the Green Belt (Site 67 - Tannery House, Cheriton, and land adjacent, Tannery Lane, Send) was identified in the Draft Local Plan (2014) to contribute to meeting the assessed need for employment floorspace. It was proposed Send Business Centre would be expanded on to this site and it offered opportunities for start-up and innovative business floor space alongside more established companies.

The spatial strategy and site allocations were reviewed as part of the Proposed Submission Local Plan (2016) and were considered through the Sustainability Appraisal. The site no longer accorded with the proposed spatial strategy; it is located within high sensitivity Green Belt and was no longer considered appropriate. However, the site promoters objected to this amendment arguing that Send Business Centre meets the criteria for a Strategic Employment Site (because of the current size of site and number of employees). The site promoter proposed that the site therefore be designated as such (rather than a Locally Significant Employment Site).

- 4.47 Submission Local Plan Policy E2 directs proposals for new office and research & development to sequentially preferable locations. Third in the sequentially preferable hierarchy are Strategic Employment Sites. For this reason, it would not be appropriate to designate Send Business Centre a Strategic Employment Site should the site remain washed over by the Green Belt, given the constraints to development that the Green Belt designation imposes.
- 4.48 However, upon further reflection we consider that whilst the site is located within high sensitivity Green Belt, the unique nature of the site, coupled with the existing digital infrastructure serving the site, Send Business Centre is an appropriate location for further employment development. The Submission Local Plan proposes to inset Send Business Centre and the adjoining land from the Green Belt, designating it as a Strategic Employment Site. We consider there are a number of factors that together constitute the exceptional circumstances to justify removing it from the Green Belt.

- 4.50 Send Business Centre provides serviced and managed office space for long or short-term hire, designed for knowledge economy and creative start-ups, ranging from music producers through to computer game developers. Part of their unique offer is very high-speed fibre optic resilient internet. Send Business Centre is supplied by two geographically resilient exclusive fibre pipelines scalable to 10GB. This means it is one of the fastest and best-connected broadband sites outside of the City of London for short-term rented office space.
- 4.51 Send Business Centre and Tannery Studios have been supported by the Enterprise M3 (EM3) Local Enterprise Partnership (LEP) through infrastructure funding. EM3 have provided a 5-year loan of £156k from their infrastructure fund to improve the internet infrastructure and shore-up the wharf. The LEP funding contributed to part of the contractor mobilisation, connection and installation and testing charges to enable geographical resiliency.
- 4.52 In the first round of funding, McLaren and Send Business Centre were the only private sector beneficiaries. Demonstrating successful implementation, Send Business Centre were subsequently approved a £1.3m loan to convert part of the existing obsolete buildings refurbished into a sound and video hub to support Guildford unique creative digital supply chain. Guildford is at the centre of this unique supply chain with educators including the Academy of Contemporary Music (ACM) and University of Surrey who provide graduates in computer gaming, sound and related fields as well as being at the centre of the video games, virtual effects and animation sectors. Tannery Studios seeks to become the creative hub at the core of this.
- 4.53 There are a variety of existing buildings on the site. The current Business Centre is close to full occupation and work is currently underway to convert some of the older buildings into additional studio space with meeting rooms and small offices using the LEP loan. This work is currently under construction and is due for completion in early 2018. The combination of location, reliable high-speed broadband and specialist facilities, including sound and video production studios is thought to be one of only a handful in the region. Tannery Studios already accommodates 60 businesses and they hope the loan, in addition to their partnerships with the University of Surrey and SETSquared³ (university incubator), will help identify and mentor start-ups as well as promote their growth. Over the next few years, this investment will help create an estimated 400 new direct and indirect jobs, and in the process revitalise a former industrial site.
- 4.54 It is hoped that the provision of local facilities and a creative hub will reduce the number of creative graduates from The ACM and University of Surrey lost to London. Pulling together a cluster of creative companies means that they are able to work together and create a collaborative atmosphere of open innovation.
- 4.55 There is also potential for significant expansion of 6-7,000 sq m on to the land adjacent. This is likely to be phased over the plan period. Initial master planning ideas show sensitive design to complement the surroundings.

³ The SETSquared Partnership is the enterprise collaboration between the universities of Bath, Bristol, Exeter, Southampton and Surrey. They support high tech start-up companies, providing student enterprise and enabling academics to maximise the impact of their research.

- 4.56 We have received some representations regarding the changes between the site assessment of Send Business Centre in the 2015 and 2017 ELNA. Following the publication of the 2015 ELNA, we received several comments regarding inaccuracies in the site assessment table and published errata. The Send Business Centre website states:
- There are regular bus services to Guildford and Woking from the end of the lane, which is a short walk from Send Business Centre. Therefore, this constituted “good” access rather than “very poor”.
 - Parking was updated from “adequate” to “good” as there is a large surface car park available for tenants use.
 - Potential for intensification/additional floorspace was updated to reflect the potential for development.

Industrial (B1c/B2/B8) Strategic Employment Sites

Slyfield Area Regeneration Project (SARP)

- 4.57 Slyfield Industrial Estate is one of the Industrial Strategic Employment Sites. The SARP site was also identified in the draft Local Plan (2014) and remains a proposed allocation as a mixed-use development on a previously developed site in Guildford urban area. This is a proposed strategic development site, delivering approximately 1,500 homes, 1000 of which will be delivered in the plan period, in addition to industrial floorspace. Some of the industrial floorspace being located on this site is specifically for the relocated Guildford Borough Council Depot, in addition to the Surrey County Council Waste Transfer Facility and Civic Amenity Facility, which cannot be provided elsewhere. There is also a net increase of 6,500sq m for use class B1c light-industrial or trade counters. The delivery of this site is dependent upon the relocation of the current Sewage Treatment Works. For this reason, delivery is not expected until the latter part of the plan period.

Land around Burnt Common warehouse, London Road, Send

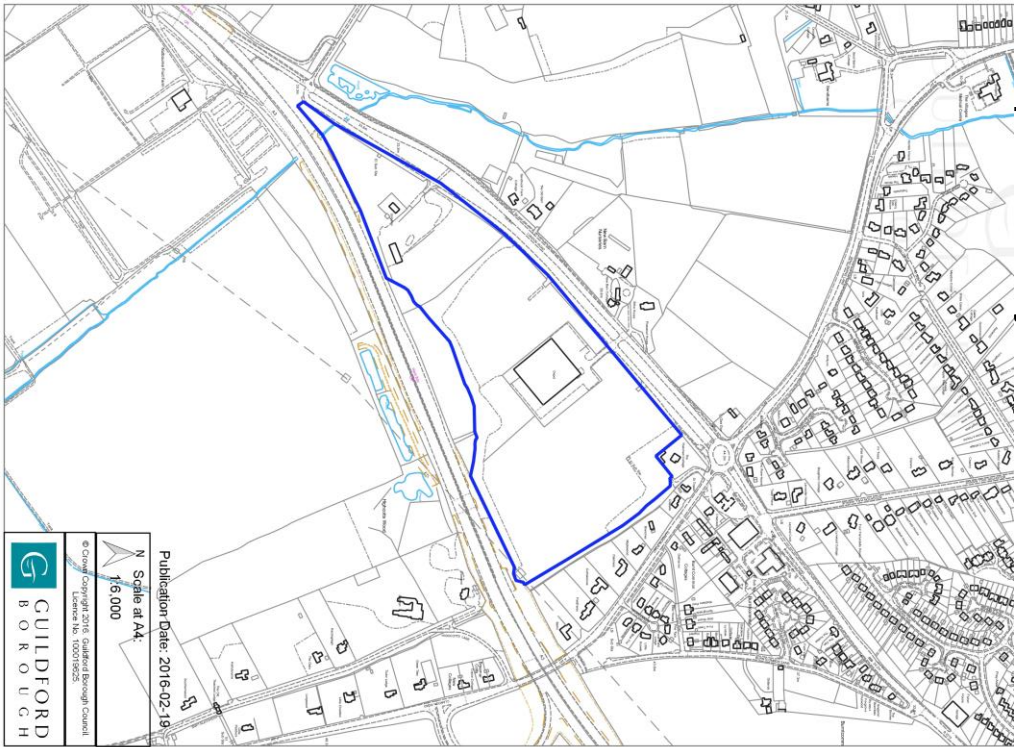
- 4.58 The 13.4ha site is partially in use for storage and distribution and surrounded by undeveloped land. The site was identified in the Draft Local Plan for a mix of B Class uses, or a mix of B Class uses and housing, and would become a new Industrial Strategic Employment Site. The site was included in the Borough, Economy and Infrastructure Executive Advisory Board (EAB) version (13 April 2016) of the Proposed Submission Local Plan (2016) (site allocation Policy A43) and was included in the version of the Local Plan on the Executive agenda. The site policy allocated the site for residential (approximately 100 homes) and employment uses (up to 7,000 sq m of either or a mix of light industrial (use class B1c), general industrial (B2) and storage and distribution (B8)). However, before the document was considered by the Council’s Executive the site was replaced with a new site of 30ha to the east of Burnt Common Lane, south of Portsmouth Road, and north of the A3, titled Garlick’s Arch, Send Marsh/Burnt Common and Ripley (site allocation Policy A43).

- 4.59 The reasons set out for the proposed change were that the site:
- would provide land to facilitate the provision of on/off access to the A3, which will provide significant improvements to the highway network and is fully supported by Surrey County Council,
 - location affords greater separation between Send Marsh/Burnt Common and the proposed site allocation at Gosden Hill Farm, Merrow Lane, Guildford (site allocation policy A25),
 - provides the employment floorspace needed in the plan to help meet identified needs, and
 - has additional capacity for residential development and can provide these homes in the early period of the plan, assisting with meeting backlog accrued as early as possible in the plan period.
- 4.60 This was on the basis that the industrial uses could be accommodated on Garlick's Arch with an increased number of homes (400 instead of 100) to help meet early delivery. The swap also lessened perceived issues of coalescence with the Gosden Hill Farm urban extension and facilitated the delivery of the new slip roads.
- 4.61 However, the decision was reviewed and in changes made to the Proposed Submission Local Plan (2017), the Garlick's Arch site remained in the Plan to provide residential use with the employment use being provided on Burnt Common. Retaining the residential element on Land at Garlick's Arch means the site can continue to facilitate the provision of northbound on and southbound off slip roads connecting to the A3 from the A247, which will provide significant improvements to the highway network and is fully supported by Surrey County Council. It can also provide homes in the early stage of the plan period.
- 4.62 The industrial uses that are no longer being met on Garlick's Arch are now proposed to be met on land around Burnt Common warehouse. This site is also located on medium sensitivity Green Belt and was proposed in the draft Local Plan (2014) for industrial and housing.
- 4.63 As set out above, following concerns raised regarding the allocation of industrial uses on Garlick's Arch, this element of the allocation has been moved in the Regulation 19 Local Plan (2017) to land around Burnt Common warehouse. The site has, however, been reduced in area to that previously identified in 2014 which addresses the issues related to perceived coalescence.
- 4.64 This site is also preferable for industrial development given it already has employment use on the site, is separate from residential development, and has potential capacity for additional floorspace that could be justified through future borough employment land needs assessments. This provides some flexibility and certainty for future needs given the difficulty in identifying suitable industrial land.
- 4.65 On this basis, we consider that the benefits of developing these two sites outweigh the harm that may be caused by removing this land from medium sensitivity Green Belt. This constitutes the exceptional circumstances required to amend Green Belt boundaries in this location within the context of the reasons outlined above that justify the necessity of amending the Green Belt boundary in Guildford. Further information is provided in the Housing Delivery Topic Paper.

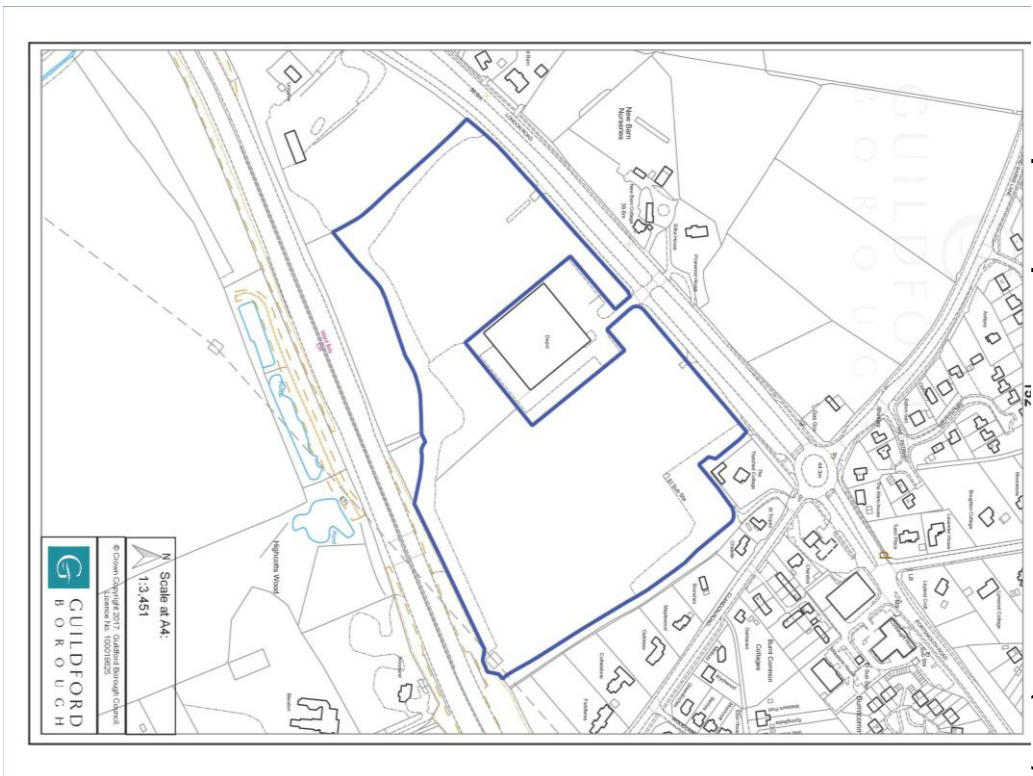
Ewbank's, Burnt Common Auction Room

- 4.66 We have received a representation regarding the exclusion of the Ewbank's Burnt Common Auction Room site from the Land around Burnt Common warehouse site allocation. This excluded site forms the additional triangular-shaped parcel of land between the A3 and B2215 London Road.
- 4.67 The Ewbank's Auction Room site was previously included with the adjacent land around Burnt Common warehouse as part of this proposed employment site in earlier versions of this Local Plan. It was in the Draft Local Plan (2014) as Site 74, and in the version of the Proposed Submission Local Plan (2016) which was considered by the EAB on 13th April 2016, and in the papers for the meeting of the Council's Executive Committee.
- 4.68 The objection has highlighted that the report to the Executive stated about the whole site that: *"the site is located in a yellow (medium) sensitivity land parcel. Our Employment Land Needs Assessment identifies a need for industrial land and this site is the only suitable and deliverable site identified by the Green Belt and Countryside Study that could meet this need"*.
- 4.69 As set out above, the Ewbank's Auction Room triangular site has been excluded to address the issues related to perceived coalescence. Concern has been expressed regarding the potential for continuous development along the A3 corridor. The Land around Burnt Common warehouse site is considered to have sufficient capacity to meet the need identified in the 2017 ELNA and additional capacity to accommodate more development if need is identified in ELNA updates or in future plan periods. Therefore, it is not considered necessary to allocate the additional piece of land to meet identified needs.

Site map considered by EAB in 2016



Land around Burnt Common warehouse, London Road, Send



Site map in Proposed Submission Local Plan (2017)

Out of centre locations

New settlement at the former Wisley airfield

- 4.70 Details of the site, including the exceptional circumstances that justify removing it from the Green Belt, are provided in the Housing Delivery Topic Paper and it is not intended to repeat this here.
- 4.71 This site was identified in the draft Local Plan (2014), remaining an allocation in the Submission Local Plan. In order to create a sustainable new settlement and provide some level of self-containment, it is proposed for a mix of uses including 2,000 homes, approximately 4,200 sq m of employment land and other associated uses. We consider that it is important for mixed communities that we do not create a new settlement without some additional job opportunities and services, helping ensure that the site is relatively self-contained.

Site allocation A34: Broadford Business Park, Shalford

- 4.72 The site is previously developed land in the Green Belt, allocated for 100 homes in the Proposed Submission Local Plan (2016). However, we have reappraised how best to meet both housing and employment needs in the borough in subsequent iterations of the Plan. Given the loss of employment sites to housing that has already occurred due to permitted development rights, which we expect to continue, we are concerned at the ability to provide sufficient and varied office floorspace across the borough throughout the Plan period. Though not sequentially preferable, Broadford Business Park is considered suitable given the inability to identify sufficient sequentially preferable sites.
- 4.73 Broadford Business Park is an established business park, which provides a mix of industrial and office space. It is home to companies such as Gordon Murray Design, a British visionary design and engineering company and Surrey County Council. It is not grade A space and consequentially meets the need for lower cost employment space in the borough. The vast majority of the office floorspace need is proposed to be met within the Submission Local Plan on the extension to the Surrey Research Park – retention of this site would therefore help provide a variety and mix of floorspace.

Summary

- 4.74 We are confident that these sites combined meet the identified need in an appropriate and sustainable way.

Rejected sites

- 4.75 Whilst we consider as a starting position that development in red (high) sensitivity Green Belt is inappropriate, we still need to assess whether there are particular benefits in doing so which would serve to outweigh the Green Belt harm.

Land north of Slyfield Industrial Estate

- 4.76 An undeveloped 4ha site in the Green Belt was identified in the Draft Local Plan (2014) to meet the identified employment need. It was proposed that it would become an extension to Slyfield Industrial Estate, one of the Industrial Strategic Employment Sites. However, as set out in paragraphs 4.7 to 4.18, the identified need for employment land over the plan period was significantly less in the 2015 ELNA than in the 2014 ELA, so the number of sites needed to meet the need was reduced. Our spatial strategy and site allocations have been considered through the Sustainability Appraisal and this site no longer accords with the proposed spatial strategy in the Local Plan. The site was not identified in the Green Belt and

Countryside Study and is located within high sensitivity Green Belt. We do not consider it appropriate to allocate land within high sensitivity parcels unless there is strong justification for doing so. As the need has been met on other sites, it is therefore no longer considered appropriate to remove this site from the Green Belt and allocate it for industrial use.

Ash and Tongham

- 4.77 This refers to land that forms an extension of Ash and Tongham urban area (Site allocation Policy A29). The Tongham Triangle site (23ha) was identified in the Draft Local Plan (2014) for a mix of B-class uses. However, it is no longer available for employment and is being proposed for housing as part of site A29 Land to the south and east of Tongham and Ash in the Submission Local Plan. Part of the original Tongham Triangle already has planning permission for residential use.

Land north of Keens Lane

- 4.78 The entire land parcel is identified as a PDA in the GBCS as a medium sensitivity Green Belt site. However, the northern part of the site extends into the 0-400m buffer of the SPA within which residential development is inappropriate. This southern part of the site was identified in the draft Local Plan (2014) and remains a proposed allocation capable of delivering 140 homes with a care home (within the 400m buffer) in the Submission Local Plan.

- 4.79 We have considered other uses including employment on the remaining northern part of the site, within the 400m buffer. However, as set out in paragraphs 4.7 to 4.18, the identified need for employment land over the plan period is less in the 2016 ELNA than in the 2014 ELA, so the number of sites needed to meet the need has been reduced. We consider that there are other more suitable sites, more accessible sites that are preferable to this one. For this reason, we do not consider the full PDA suitable for allocation and have instead, using defensible boundaries within the site, allocated a smaller part of it. On this basis we consider that the benefits of developing this site outweigh the harm that may be caused by removing this land from medium sensitivity Green Belt.

Clandon Golf

- 4.80 A detailed analysis of the site is provided in the Housing Delivery Topic Paper and it is not intended to repeat this here.
- 4.81 We are seeking to meet our full employment needs and consider that this is better met on the other strategic sites. The extension to the Surrey Research Park is a unique opportunity that enables us to build on knowledge-based employment that is of regional significance. This type of specialist employment could not be provided elsewhere. As part of the Gosden Hill Farm site, we are proposing a new employment Headquarters along the A3. We consider this will be attractive to the market and is well located well in terms of its position on the A3 and planned new rail station and Park and Ride.

Quality

- 4.82 As well as ensuring the right quantum of floorspace is provided in the borough, the Local Plan tries to ensure that there are locations available for different qualities of floorspace as well to provide for different business needs. The ELNA (2016) provides some information regarding the needs for floorspace in Guildford borough and so does some of the evidence feeding into it (particularly the Lambert Smith Hampton Thames Valley Office Market Report 2015), in addition to consultation responses.
- 4.83 Guildford's office market is split between Guildford town centre space, and out-of-centre in locations such as Surrey Research Park. The existing town centre office stock has good access to public transport facilities and amenities, but there is almost no new stock,

floorplates are mostly small and supply is limited. No new grade A floorspace has come to the market since 2010. New additions have been high spec refurbishments such as 31 Chertsey Street and One London Square. Rents for grade A offices in the town centre are around £30/sq ft and it is anticipated they will rise to £34/sq ft soon. In comparison, grade B offices were valued at £20-22/sqft.

- 4.84 Out-of-centre office floorspace, is generally larger and of higher quality, with dedicated parking. Out-of-centre office buildings are estimated to currently account for around two-thirds of total B1 office space within the borough and make up 73% of the available stock.

Office floorspace grades

There is no industry standard definition for the varying grades of office space.

Grade A / new: This refers to 'new' (or 'newly completed') high-quality office stock that has never been previously occupied; or to stock which has previously been occupied but has undergone high-specification renovations between tenants.

Grade B / second-hand: This refers to office stock that has been previously occupied and is of lower quality, without any recent renovations or refurbishments. This may include lower-grade new stock that some agents refer to as Grade C.

British Council for Offices: Making the Grade (2012)
www.bco.org.uk/nmsruntime/saveasdialog.aspx?IID=515

- 4.85 In both Guildford and the wider South East there is a lack of grade A industrial and storage space available. LSH found overall availability rate for industrial space in Guildford borough of 6.2% in 2014, down from 8.4% in 2012 and 7.4% in 2013. In addition, vacancy rates were found to be low across the industrial employment sites in July 2015 at just 3.7%, which supports the idea of a contracting level of vacancy rates across the Borough. In Guildford, industrial/storage rents have remained stable in recent years. Between 2009 and 2014, average rents have been consistently between £7.50 to £8.00/sqft for second-hand space and £9.00 to £10.00/sqft for prime space. These rates are broadly in line with other accessible locations in the wider South East, such as Oxford and Reading.
- 4.86 Research highlights the lack of availability of both office and industrial floorspace in the borough. While writing the ELNA, AECOM consulted with property market experts who suggested that the current supply of industrial and storage premises is not meeting existing demand. There is a lack of available sites and these sites tend not to deliver the quality and type of space occupiers need. The Local Plan seeks to meet the identified need for employment land over the plan period but does not seek to meet all possible commercial demand for land. The borough is constrained by the capacity of the infrastructure, which limits the amount of development that can be delivered in a sustainable way. Employment land and the jobs provided must be balanced with housing provided.
- 4.87 The LAA has also identified a lack of sites coming forward in the town centre to provide employment floorspace. Policies E1 to E4 of the Local Plan seek to provide, protect and direct. They not only look to provide the right quantum of floorspace in the borough but also to direct it to the right location and ensure the right quality in the right locations. Policy E2 seeks to direct floorspace to sequentially preferable locations (as set out in the hierarchy section above) and because of the level of demand, Policy E3 seeks to protect existing floorspace (within the requirements of the NPPF).

Meeting identified needs

- 4.88 Surrey Research Park will provide a substantial quantum of the office (B1a) and research and development (B1b) floorspace required over the plan period. In addition to this, the Gosden Hill site will provide a grade A office headquarters of approximately 7,000 sq m on the northern side of the site, close to the A3. This will be identified as a new strategic employment site. The southern side of the site will provide around 3,000 sq m of smaller units, potentially a mix of grades, some of which will be suitable for business start-ups. Send Business Centre and Tannery Studios will meet another proportion of the identified need with the new development on site. The former Wisley Airfield will provide some office development (1,800 sq m) and some industrial and storage (2,500 sq m) as part of the mixed-use scheme.
- 4.89 A large proportion of the net additional land requirement for industrial/storage may be met through the permissions which have been consented but which have yet to be implemented. This includes outstanding permission of over 8,000 sq m at Henley Business Park. There is the possibility that some pipeline developments may not come forward at all or, as many of the permissions are flexible (B1c/B2/B8), there is uncertainty into exactly which use class may be built out. The two main locations for industrial and storage development are on Burnt Common (7,000 sq m) and as part of the Slyfield Area Regeneration Project (6,500 sq m additional). There is also some potential for intensification at Slyfield Industrial Estate and other existing strategic industrial sites. These two sites both have excellent connections to the A road network which is key for this use-type.
- 4.90 Table 7 below establishes the actual and anticipated gains and losses on employment space (B1a, B1b, B1c, B2, & B8) over the plan period. The table includes available information on planning permissions, in addition to sites both allocated in the Local Plan and identified in the LAA. In Table 7, some employment land floorspace gains and losses have been recalculated from the total site size identified in the LAA, as described in paragraphs 4.91 and 4.92, such that employment need is not largely skewed by the specific characteristics of some individual sites.
- 4.91 Industrial employment land need is measured in Hectares; the table includes an equivalent measure in square metres to aid clarity and consistency in assessing actual need and delivery. For each site, the amount of industrial employment floorspace either gained or lost has been measured at the standardised calculation of (floorspace in square metres / 10,000) / 0.45 (Ha). This has been applied in order to establish a measurement that is representative of the actual amount of industrial employment floorspace lost on a site. For example, the former Tyrrells site (LAA Site reference 1502) measures 5.7 hectares total. However, the actual industrial employment floorspace lost on this site will be -1,650 sq m. As such, the amount of Industrial employment space measured has been re-calculated to a 0.37Ha loss. To suggest that 5.7 Ha of industrial employment land would be lost on this site would be unrepresentative and would distort genuine levels of need.
- 4.92 Additionally, the amount of office floorspace delivered by the Pirbright Institute planning permission has been calculated at a different rate. Floorspace delivered will be B1b, which is typically delivered at a much less dense rate per employee than B1a office space, as identified previously. As office employment need identified includes both B1a and B1b, the floorspace delivered by the Pirbright Institute has been (re-)measured at 11 square metres per employee, rather than the floorspace identified in the planning permission. This ensures that the figure remains comparable to B1a office space delivered and does not overly attribute the amount of employment floorspace delivered by this site, which could otherwise skew the amount of office space left to deliver.

Table 7: Key losses and gains of B class floorspace

ELNA (2017) Identified Need					
Situation	Office (B1a) and R&D (B1b) (Sq. M)		Industrial (Ha)		Industrial (Sq. M)
Low Case	36,100		3.7		16,650
Medium Case	39,800		3.9		17,550
High Case	43,700		4.1		18,450
Loss of Use Class B1a, B1b, B1c, B2 & B8					
Site Reference	Site Description	Office (B1a) and R&D (B1b) Class Use (Sq. M)	B1c, B2 & B8 Class Use (Hectare)	B1c, B2 & B8 Class Use (Sq. M)	Notes
LAA Site 16	Land rear of Bell and Colvill, Epsom Road	N/A	-0.12	-525	
LAA Site 35	Land at Oak Hill, Wood Street Village, GU3 3ES	N/A	-0.14	-623	
LAA Site 115	Land at 148 Broad Street, Wood Street Village	N/A	-0.21	-957	
LAA Site 205	North Street Re-development	-3,211	N/A	N/A	Local Plan Policy A6 requires that minimum 5,500 sq m office floorspace be retained through development.
LAA Site 350 (and 1219)	Carlans Garage, Epsom Road, East Horsley	-140	-0.07	-315	
LAA Site 525	York House, Chertsey Street	-460	N/A	N/A	Prior Approval received change of Use to C3 Residential
LAA Site 917	Garage, The Common, Horsham Road	N/A	-0.09	-400	
LAA Site 1104	Framptons Yard, Bryanstone Avenue, Guildford	N/A	-0.18	-800	
LAA Site 1121	Works, Poyle Road, Tongham	N/A	-0.13	-580	
LAA Site 1164	Surrey Police Headquarters, Mount Browne	-4,372	N/A	N/A	
LAA Site 1262	69 Woodbridge Road	-100	N/A	N/A	

LAA Site 1502	Former Tyrrell site, Long Reach, Ockham	N/A	-0.37	-1,650	Full site is 5.7 hectares. The site size lost has been calculated at the standardised rate of $[(-1,605 \text{ sq m} / 10,000) / 0.45]$ to be more reflective of actual loss.
LAA Site 1545	Hitherbury House, 97 Portsmouth Road	-523	N/A	N/A	
LAA Site 1582	The Shed Factory, Portsmouth Road, Ripley	N/A	-0.21	-940	
LAA Site 2055	Hurst House, High Street, Ripley	N/A	-0.10	-440	
LAA Site 2115	Builders Yard (Elms Garden), Glaziers Lane, Normandy	N/A	-0.80	-3,604	
LAA Site 2183	Kernal Court, Walnut Tree Close	N/A	-0.55	-2,429	
LAA Site 2216	Finance House, Park Street	-406	N/A	N/A	
LAA Site 2226	Wey Corner, Walnut Tree Close	N/A	-0.38	-1,506	
LAA Site 2324	Stadium Works, Oxenden Road	-310	N/A	N/A	Loss of B2 floorspace.
N/A	Total Prior Approvals from base date	-11,207	0.73	3,273	Gain of B1c from Send Vision Engineering.

Revised Need Taking Account of Losses

Situation	Office (B1a) and R&D (B1b) (Sq. M)	Industrial (Ha)	Industrial (Sq. M)
Low Case	56,829	6.3	28,146
Medium Case	60,529	6.5	29,046
High Case	64,429	6.7	29,946

Gains of Use Class B1a, B1b, B1c, B2 & B8 – Planning Permissions

Site Reference	Site Description	Office (B1a) and R&D (B1b) Class Use (Sq. M)	B1c, B2 & B8 Class Use (Hectare)	B1c, B2 & B8 Class Use (Sq. M)	Notes
Planning Application 17/P/00243	Guildford Business Park	5,684	N/A	N/A	

Planning Application 15/P/00604	Pirbright Institute	5,632	N/A	N/A	Gained floorspace calculated to make adjustment for staff density of gained floorspace.
Planning Application 14/P/01054	Henley Business Park	1,201	2.66	11,976	Full site is 6.3 hectares. Site size gained has been calculated at standardised rate of 0.45 / 6,833 sq m to be reflective of actual gain.
Planning Applications 13/P/00628 16/P/00471	Surrey Research Park	6,828	N/A	N/A	With regard 13/P/00628 – Building A has completed; Building B is likely to be completed at a smaller size.

Revised Need Taking Account of Gains

Situation	Office (B1a) and R&D (B1b) (Sq. M)	Industrial (Ha)	Industrial (Sq. M)
Low Case	37,484	3.6	16,170
Medium Case	41,184	3.8	17,070
High Case	45,084	4.0	17,970

Gains of Use Class B1a, B1b, B1c, B2 & B8 – Site Allocations

Site Reference	Site Description	Office (B1a) and R&D (B1b) Class Use (Sq. M)	B1c, B2 & B8 Class Use (Hectare)	B1c, B2 & B8 Class Use (Sq. M)	Notes
Site Allocation A24	Slyfield Area Regeneration Project	N/A	1.40	6,500	
Site Allocation A25	Gosden Hill Farm, Merrow Lane	10,000	N/A	N/A	7,000 sq m Employment Headquarters near A3. Additional 3,000 local employment space on site.
Site Allocation A26	Blackwell Farm, Hogs Back	30,000	N/A	N/A	
Site Allocation A35	Former Wisley Airfield, Ockham	1,800	0.56	2,500	Site size attributed to industrial (Ha) has been calculated at the standardised rate of 0.45 / 2,500 sq m to be reflective of potential gain.
Site Allocation A58	Land around Burnt Common warehouse, London Road	N/A	2.33	7,000	Site size attributed to industrial (Ha) has been calculated at a rate of 0.3 / 7,000 sq m to be reflective of potential gain given additional constraints on site.
LAA Site 1251	Send Business Centre, Tannery Lane	8,400	N/A	N/A	

Revised Need Taking Account of Site Allocations

Situation	Office (B1a) and R&D (B1b) (Sq. M)	Industrial (Ha)
Low Case	-12,716	-0.7
Medium Case	-9,016	-0.9
High Case	-5,116	-1.1

Delivering Employment Floorspace Need

- 4.92 As Table 7 demonstrates, over the course of the Plan period we have identified provision for both office and industrial employment floorspace above the identified need provided in the ELNA (2017). Allocating sites to provide circa 9,016 sq m of office floorspace (B1a and B1b) above the identified need (medium case) allows sufficient flexibility throughout the Plan period for floorspace need to be met across the borough without having to rely on the full amount of each allocation to come forward for development over this period. For example, should the full 30,000 sq m office floorspace allocated for the Surrey Research Park not come forward over the Plan period, office floorspace needs would continue to be met across the borough. Additionally, as the Research Park expansion is allocated for B1b (and limited B1c) employment floorspace, within a highly specialised range of knowledge-based industries, it is important that B1a need continues to be met at a sufficient level across the borough to support sustainable employment growth within and around Guildford.
- 4.93 Additionally, Table 7 demonstrated that, over the course of the Plan period, we have identified provision for industrial employment floorspace above the identified need. Although, as previously mentioned, this allows important flexibility in provision throughout the Plan period; there remains further scope to increase the density of provision on some sites, such as Site Allocation 58 – Land around Burnt Common warehouse, to ensure that industrial employment floorspace needs are met across the borough without having to rely on the full amount coming forward on other allocated sites.

Marketing

- 4.94 Taking into consideration all of the employment floorspace already lost through permitted development, alongside the higher land values of residential development, we need to protect the most important employment floorspace in the borough. The Local Plan seeks to achieve this through Policy E1 which defines the Strategic Employment Sites and Locally Significant Employment sites and Policy E3: Maintaining employment capacity and improving employment floorspace. E3 requires evidence of *“active and comprehensive marketing of the site for its current use (offices, research and development or industrial) for a continuous period of at least two years”*.
- 4.95 Appeal decisions show there is no clear-cut precedent regarding the requirement for marketing evidence, with different formats and periods of time being found acceptable in different cases. Although now dated, the Mayor of London’s Technical Report Eleven to the London Plan (August 2002) titled *“A City of Villages: Promoting a sustainable future for London’s suburbs*, suggests the relocation of employment sites to housing should be resisted unless vacant for five years. London boroughs, including Merton, use this five-year period but others such as Camden use a shorter period of two years.
- 4.96 In the government’s consultation on proposed changes to the NPPF, which ended in February 2016, it was proposed to amend Paragraph 22 of the National Planning Policy Framework (NPPF) to make clear that unviable or underused employment land should be released unless there is significant and compelling evidence to justify why such land should be retained for employment use. The government is considering requiring local planning authorities to adopt a policy with a clear limit on the length of time (such as 3 years) that commercial / employment land should be protected if unused and there is not significant and compelling evidence of market interest of it coming forward within a 2 year timeframe. The requirements of Policy E3 are consistent with this.

Surrey Research Park

- 4.97 The Surrey Research Park is owned, funded and developed by the University of Surrey. The University developed from Battersea Polytechnic and a Royal Charter created the University of Surrey in 1966. The Council worked with Surrey County Council to attract this "new" university to Guildford. One of the drives behind this was to replace jobs being lost from the town's declining manufacturing base.
- 4.98 The University has a strong tradition of working closely with industry and the Surrey Research Park was originally promoted to extend this cooperation. The 1983 outline planning permission restricted the use to *"carrying out research, development and design activities, in any science, including the social sciences, that is complementary to the activities of the University of Surrey"*. This has ensured the site has remained focused on knowledge-based industry as it has developed over the last 30 years to support companies involved in the commercialisation of a wide range of sciences, including social science, technologies, health related activities and engineering. The new Surrey Research Park policy will include criteria to ensure this is continued in the extension.
- 4.99 The Research Park is broadly divided into zones for different sized businesses. Toward the eastern edge, the zone is for small start-up and spin-out companies with units from 11 to 300 sq m, with The Surrey Technology Centre at the centre. Units in this building range in size from 11 to 80 sq m and are available on a monthly licence. There are then zones for medium sized-businesses and one for headquarters.
- 4.100 In 2017, the Research Park was home to over 140 companies and almost 4,000 people were employed on the site. This makes it one of the borough's largest employment areas. It provides a mix of B1 (a and b) office space and research and development floorspace with some B1 c light industrial space and is a centre of excellence in technology, science, health and engineering. Companies at the Research Park are engaged in a broad spectrum of research, development and design activities.
- 4.101 90 per cent of the Research Park has been developed, currently providing around 65,000 sq m of floorspace and only two undeveloped sites currently remain. The Research Park website says that occupancy rates continue to be in excess of 95%. The last two plots are at Faraday Court, where recent outstanding planning permission is for 5,875 sq m of new floorspace (13/P/00628) adjacent to Fitzpatrick Referrals and on George Stephenson Place, which has permission for just less than 1,900 sq m. In addition, Surrey Satellite Technology have an outstanding permission for 2,100 sq m of additional floorspace.
- 4.102 The Surrey Research Park sees one of its main strengths as the specialist research and development offer, set in an attractive location with good access to a well-qualified work force. It provides a unique facility in the wider South East. The Employment Land Needs Assessment (ELNA) recognises the specialist offer and recommends that the site is allocated as a Strategic Employment Site. We are very keen to support and retain the specialist research and development offer through the new Local Plan and the wording of Policy E4 is set to do this. We believe the Research Park should maintain the integrity of its research base, allowing for the economic value added to the local economy of knowledge and technology transfer from the University. Neither the Council nor the University want the Research Park to be expanded into a more general-purpose business park.
- 4.103 Representations have objected to Policy E4 allowing both office use (B1a) and light industry (B1c) use on the Research Park. However, the wording does require all activities to be those *"complementary to the activities of the University of Surrey"*. Surrey Satellite Technology Limited (SSTL) have been based on the Research Park since 2006. Their website states they "provide complete in-house design, manufacture, launch and operation of small

satellites”. Their on-site manufacture would constitute B1(c) use, however as a spin-out company of the University who spent the first twenty-one years based on campus, the companies’ work is clearly complementary to the activities of the University of Surrey. It is considered most appropriate that individual businesses are assessed on a case-by-case basis within the criteria set out in the policy, as it is not possible to produce a definitive list that will cover every eventuality.

- 4.104 Representations have also commented on the low density of the existing Research Park. However, this is one of the park’s selling points. The Research Park website promotes the site as *“low density development ... and provides a high quality, working environment. The site offers highly congenial surroundings combining attractive architecture with landscaped areas and lakes...The buildings are set in large landscaped areas and two lakes provide a serene and tranquil backdrop...”*. The exact density of the Research Park extension is yet to be decided and this will form part of the planning application. Companies typically look for provision of parking when considering new premises, but the new Guildford West railway station may well provide an attractive alternative.
- 4.105 Concern has been raised in the representations that new buildings are not constructed speculatively on the University-owned Research Park. Therefore, they are only able to work with organisations that plan two years ahead, not three to six months ahead. The Council will work with the University (as with all site owners) to ensure the delivery of the site will come forward within the timescales set out in the Local Plan.
- 4.106 Representations also suggested that all car parking should be underground with buildings above. This will be considered as part of the planning application with design proposals and parking.
- 4.107 The 2013 UK Science Park Association (UKSPA) review of The Surrey Research Park revealed that the Park contributes between an estimated annual contribution to the regional economy of between £450m and £625 million¹. In addition, the companies on the Park have been responsible for a substantial increase in employment in knowledge-based sectors of the economy in Guildford and Surrey as a whole. The Surrey Research Park has maintained its focus on knowledge transfer and is considered an important part of the University of Surrey’s infrastructure, providing an entrepreneurial environment and facilities to support the commercial application of the University’s research.
- 4.108 The Blackwell Farm site (Policy A26) will include an extension to the Research Park of over 10 ha which is expected to deliver a total of around 30,000 sq m of additional office and research and development floorspace (Use Class B1 a and b) with some B1c.

5. Local Plan Policy Approach

- 5.94 The strategy on employment in the Submission Local Plan responds to the requirements of national policy and the results of our evidence. A fourth round of consultation on the Proposed Submission Local Plan: strategy and sites document took place between Friday 9 June and Monday 24 July 2017. For more information, please visit: www.guildford.gov.uk/localplan.

6. Consultation feedback

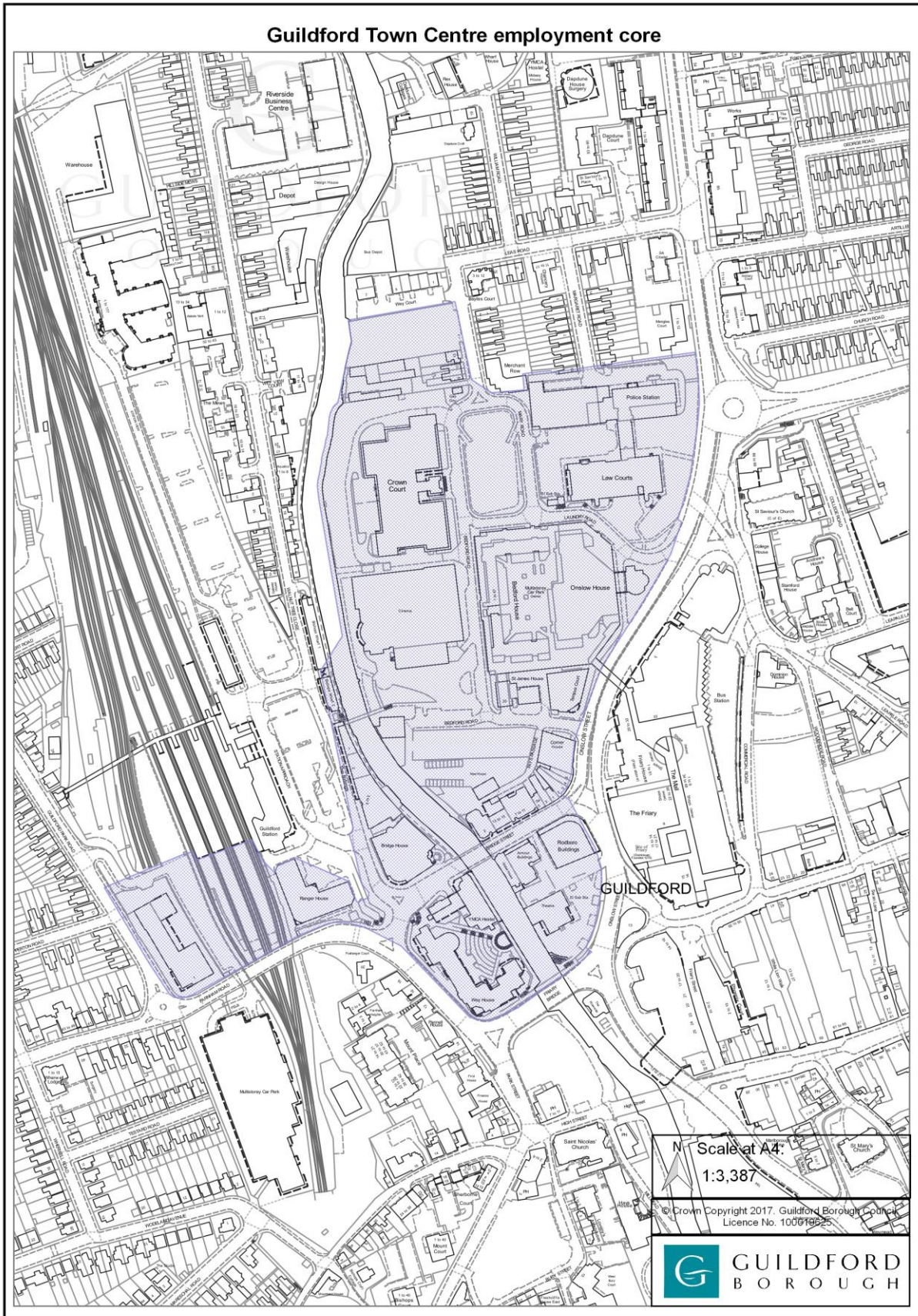
- 6.1 As part of developing the Local Plan we have consulted at the following main stages:
- Regulation 18 Issues and options (October 2013) – which identified a range of issues and potential options for how we should plan for Guildford borough.
 - Regulation 18 Draft Local Plan (July 2014) – which outlined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

7. Next Steps

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

B Class Use Strategic Employment Site Maps

Office (B1a) and Research & Development (B1b) Strategic Employment Site Maps



Surrey Research Park (extended)



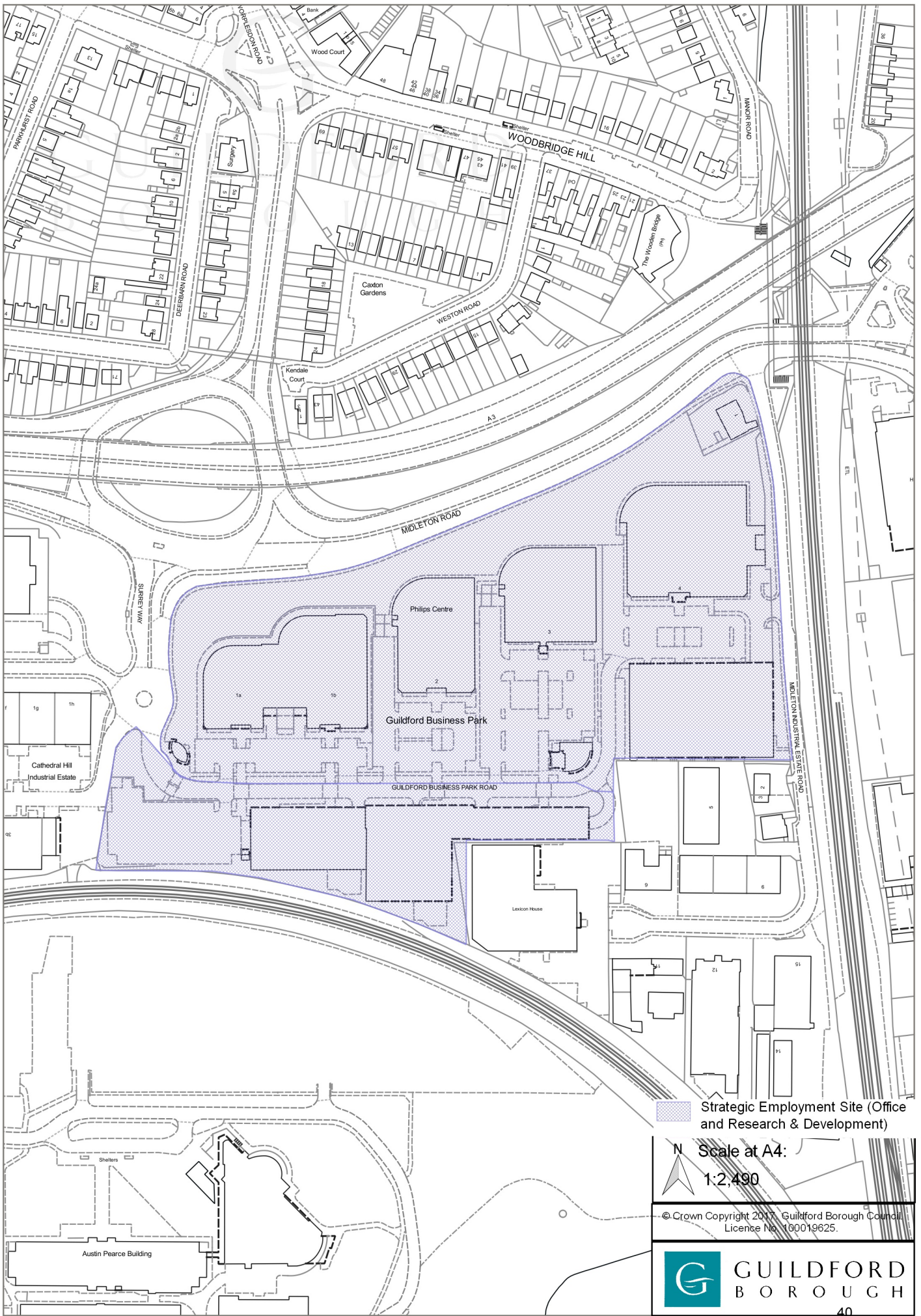
Strategic Employment Site (Office and Research & Development)


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Guildford Business Park

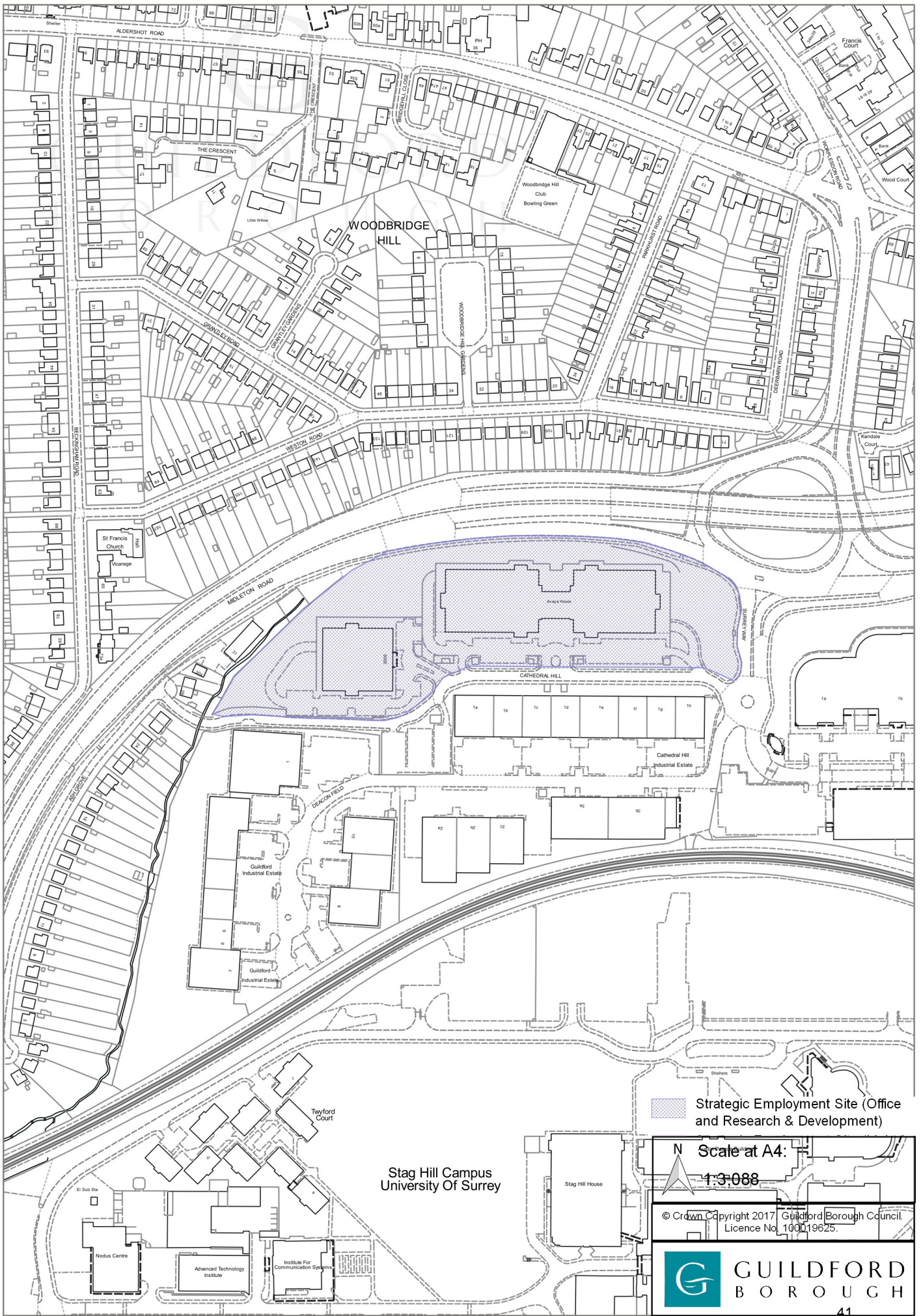



 Strategic Employment Site (Office and Research & Development)

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1000, 2000 and 3000 Cathedral Hill



 Strategic Employment Site (Office and Research & Development)

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Stag Hill Campus
 University Of Surrey

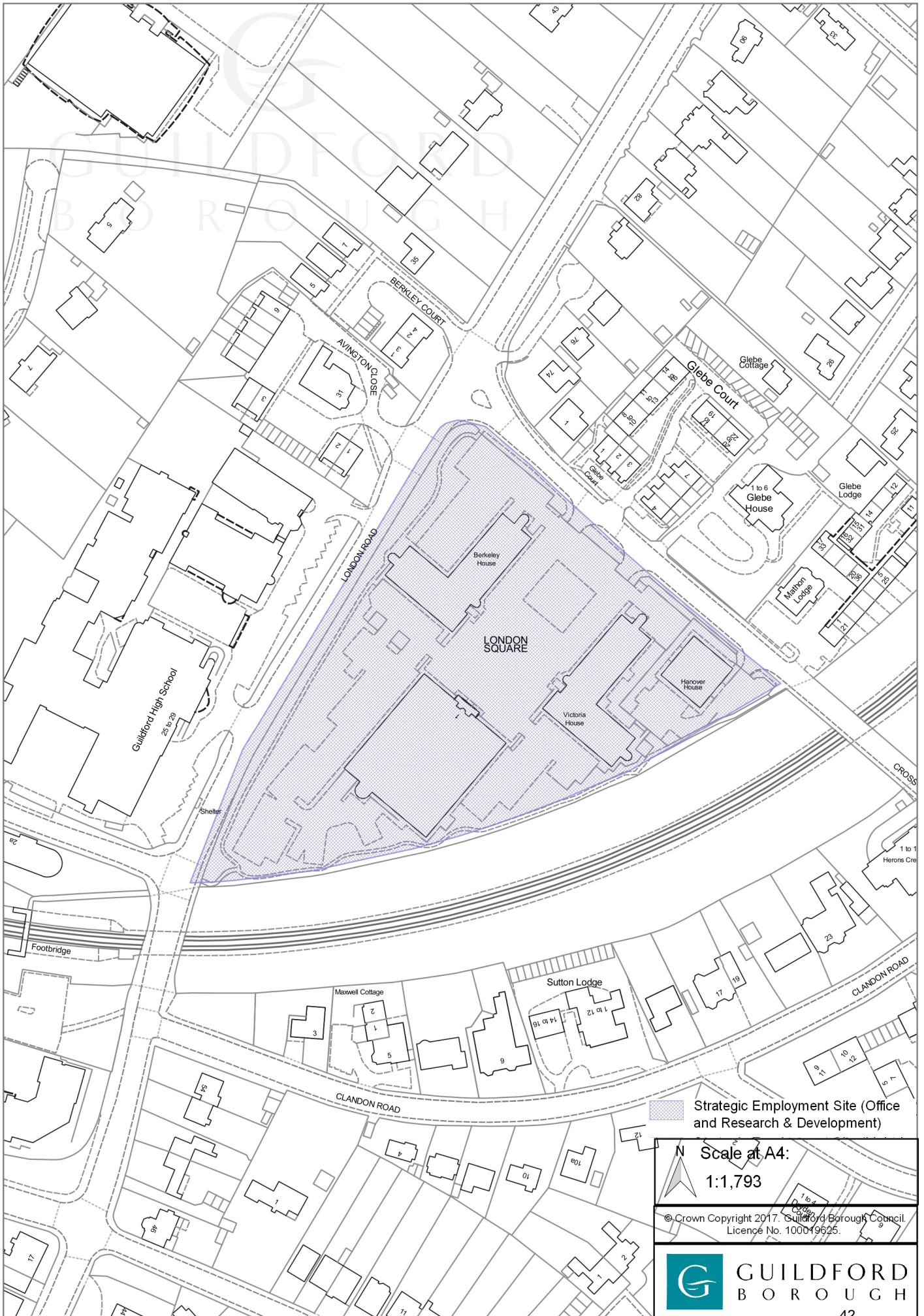
Stag Hill House

Node Centre

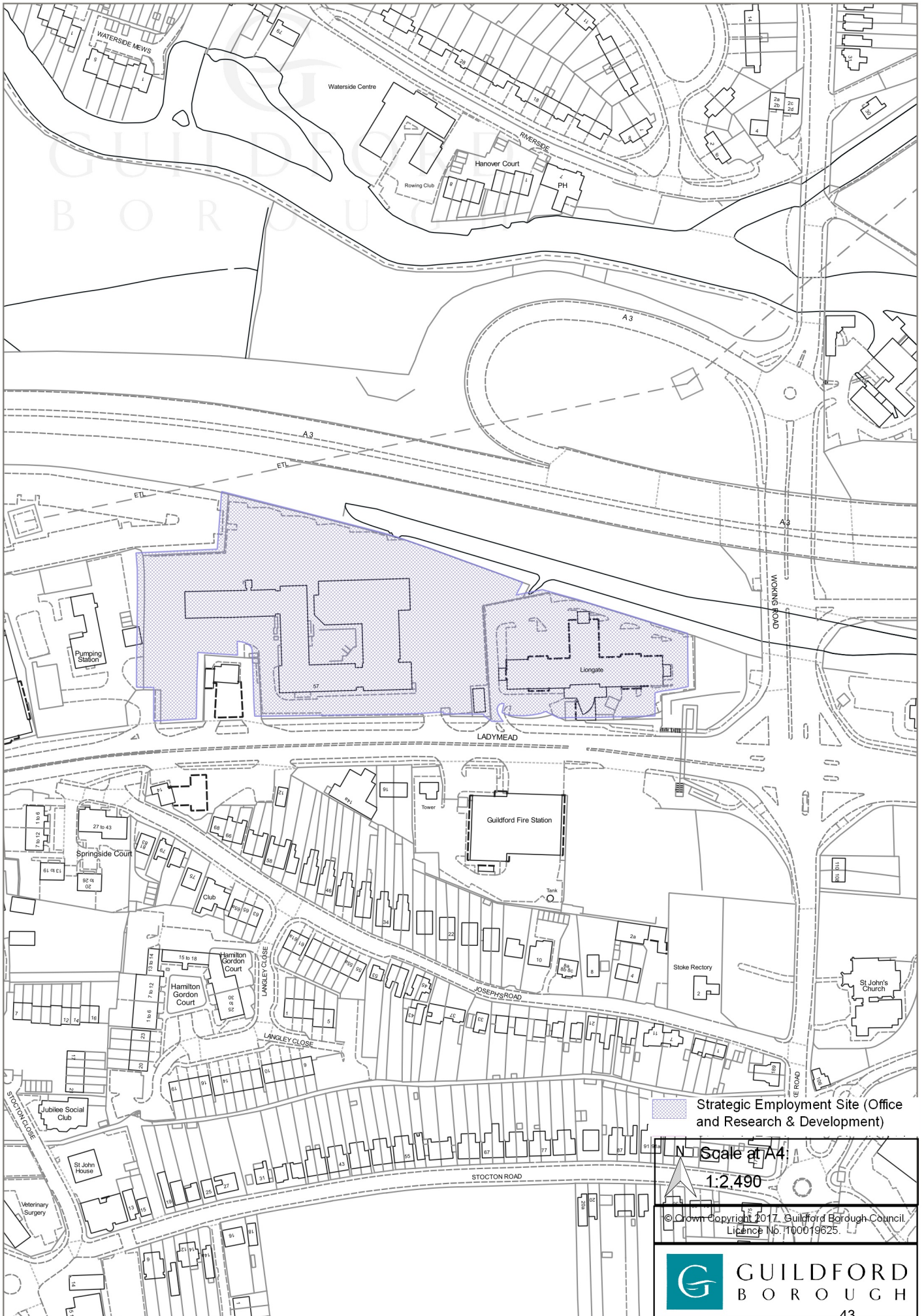
Advanced Technology Institute

Institute For Communication Systems

London Square, Cross Lane



57 and Liongate Ladymead



Strategic Employment Site (Office and Research & Development)

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The Guildway, Portsmouth Road



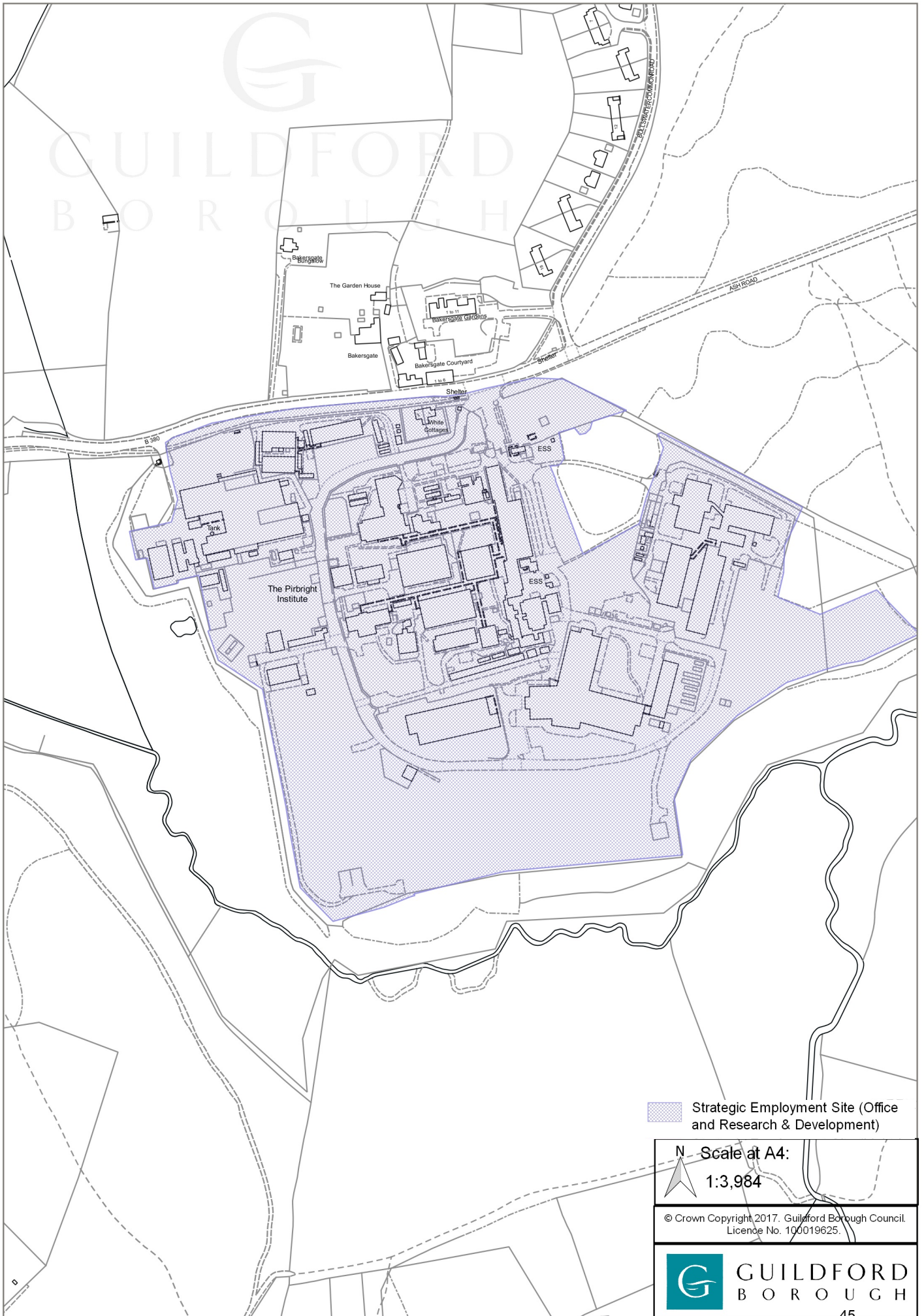
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The Pirbright Institute

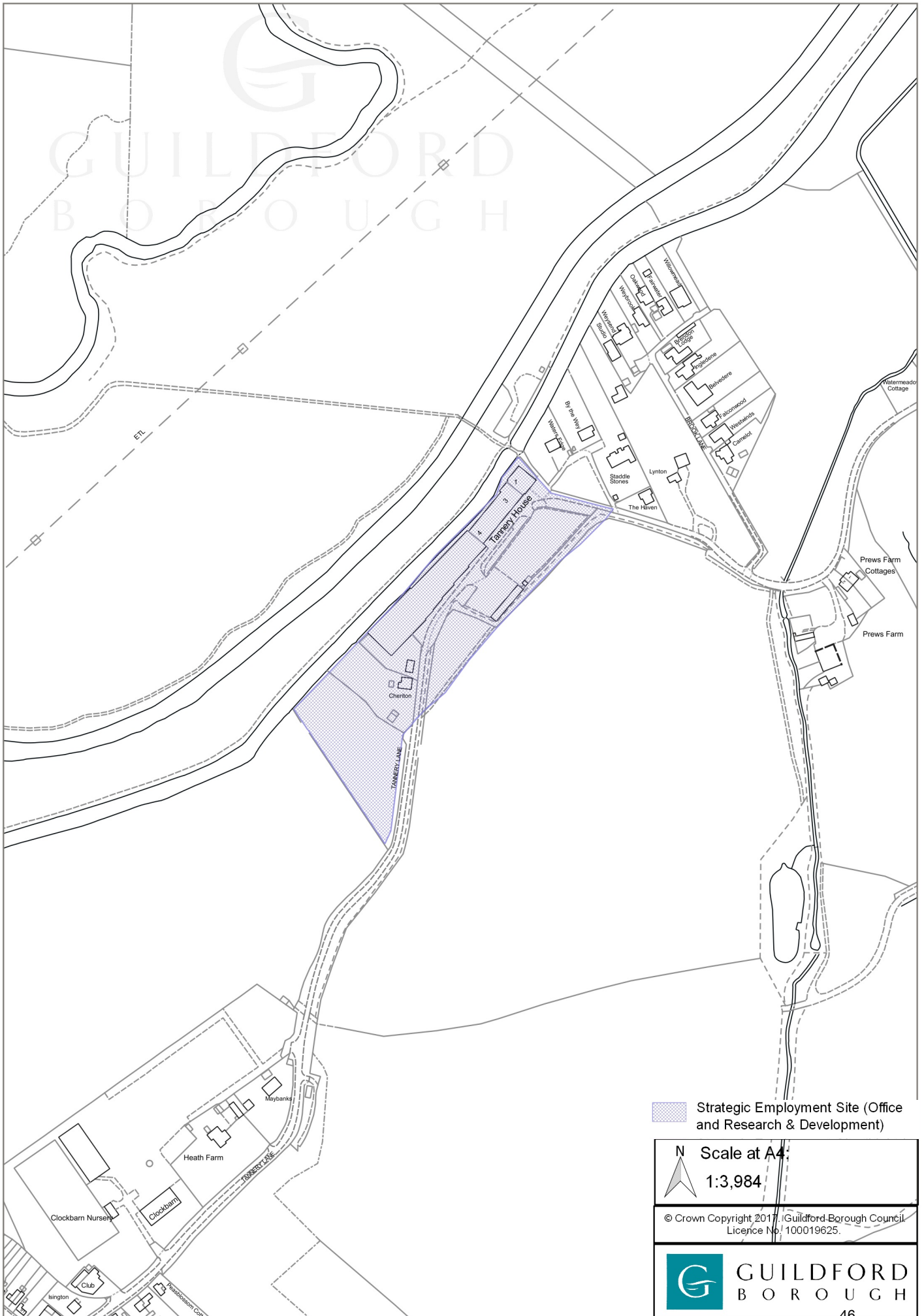


Strategic Employment Site (Office and Research & Development)

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Send Business Centre/Tannery Studios, Tannery Lane, Send



Strategic Employment Site (Office and Research & Development)



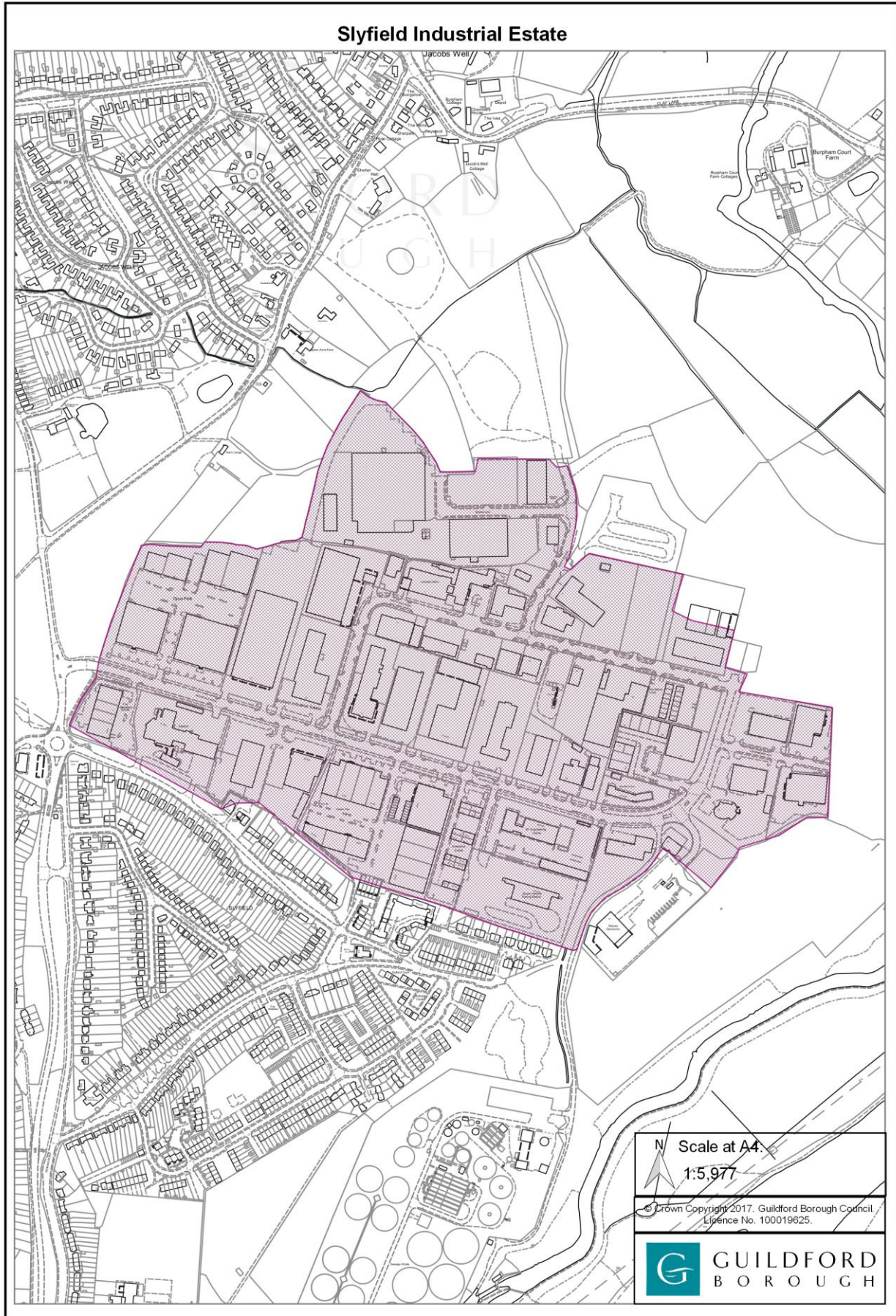
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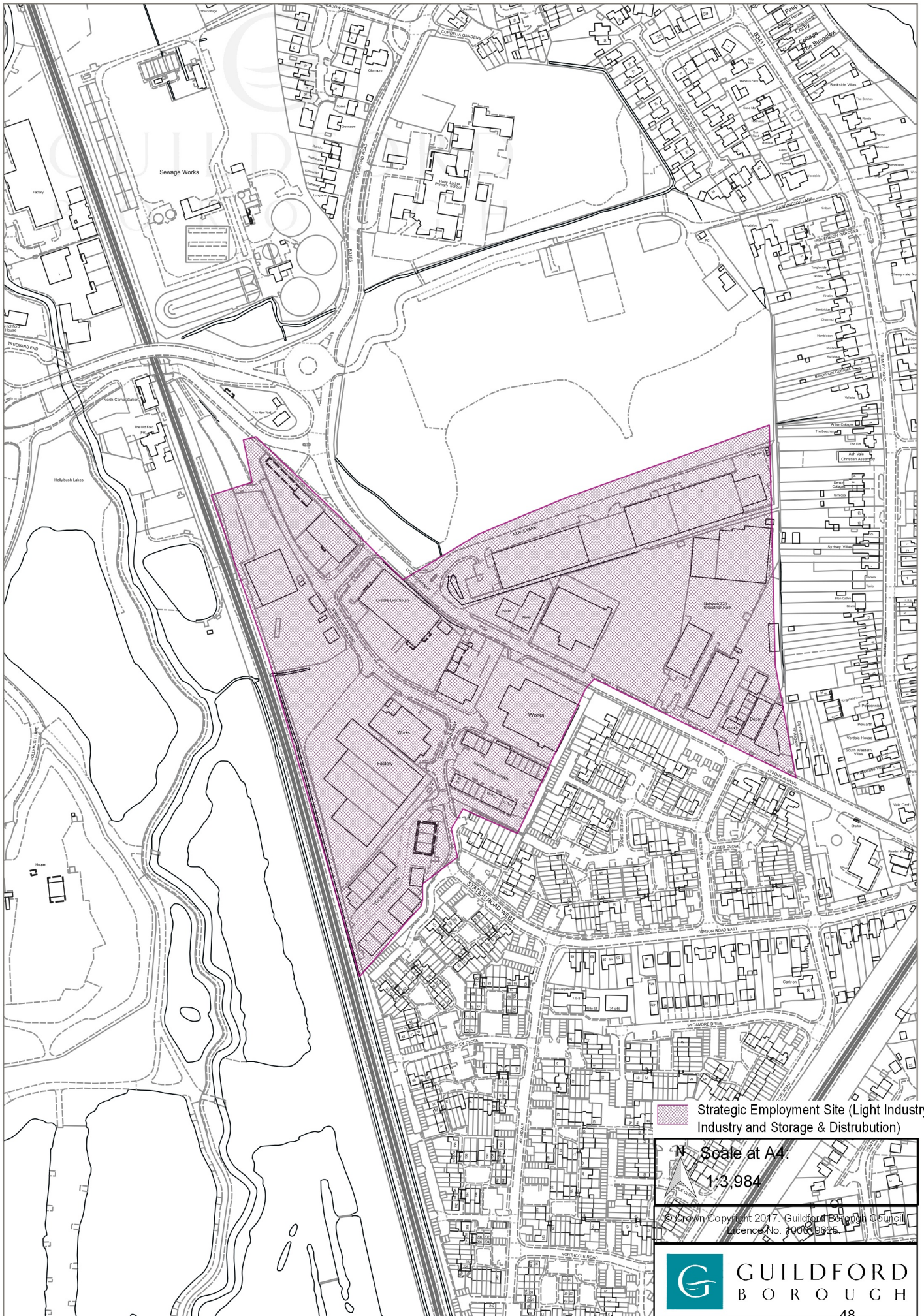


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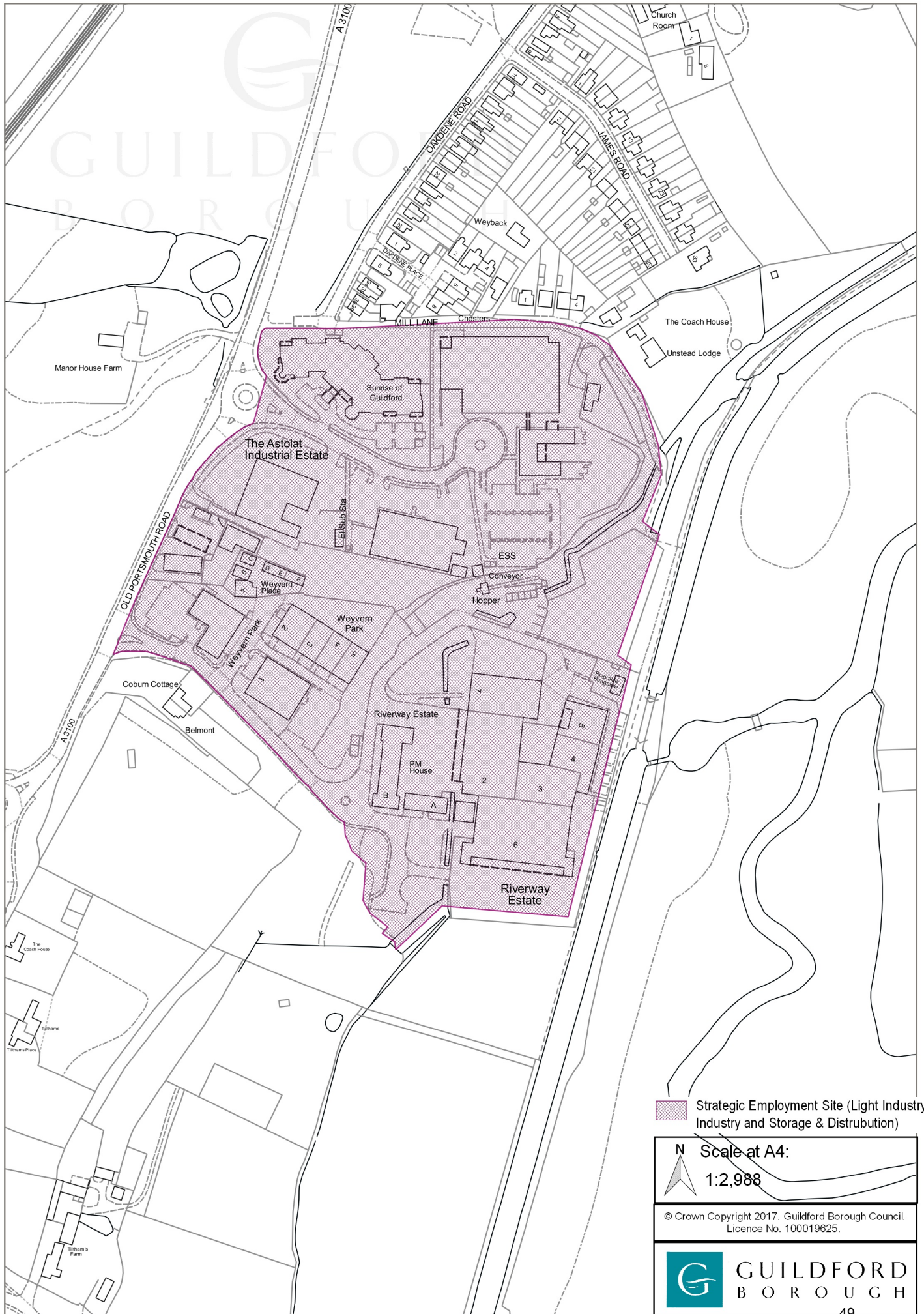
Industrial (B1c, B2 and B8) Strategic Employment Site Maps




North and south of Lysons Avenue, Ash Vale



Riverway Industrial Estate, Astolat Business Park and Weyvern Park at Peasmarsh

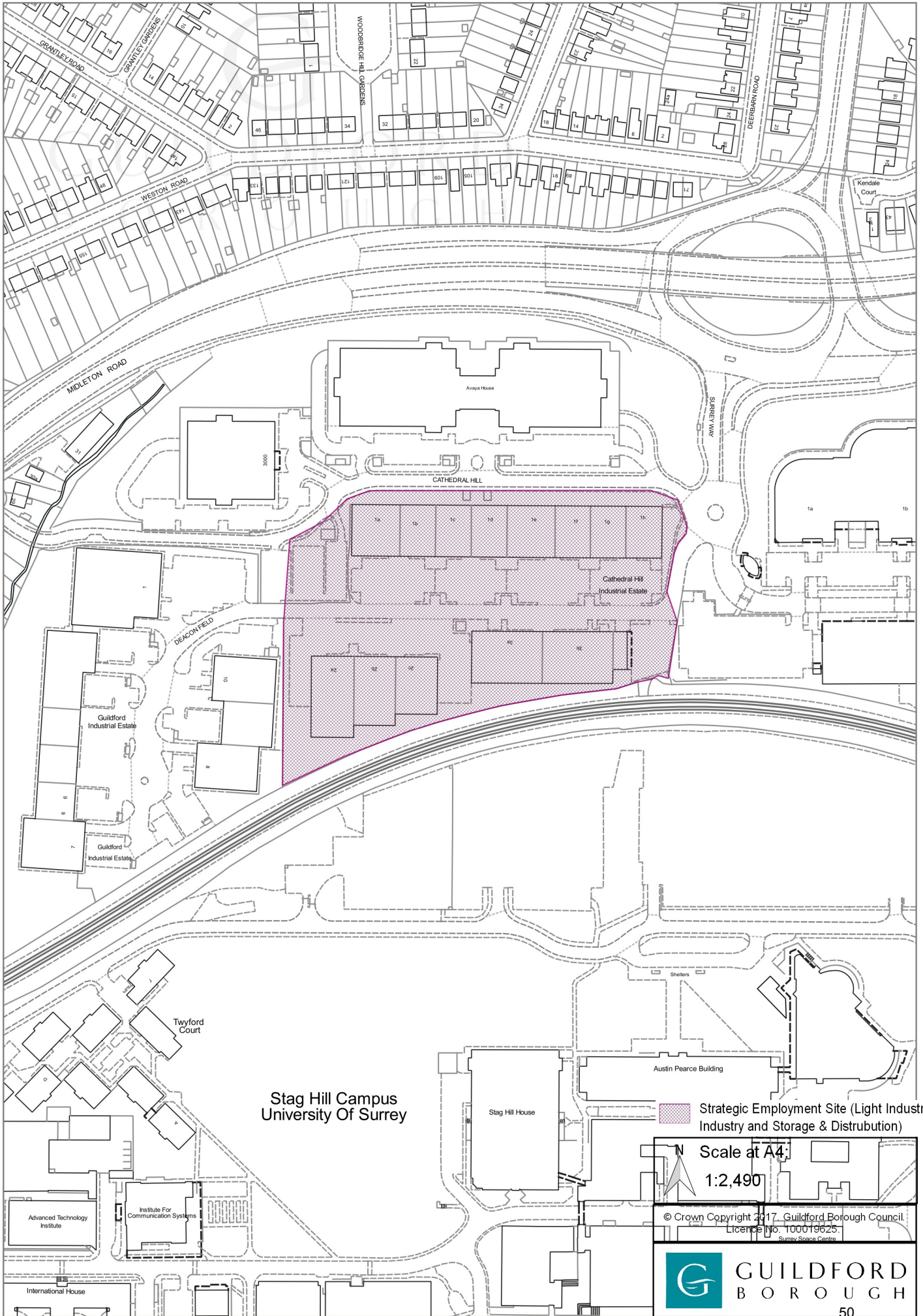


 Strategic Employment Site (Light Industry, Industry and Storage & Distribution)

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Catherdral Hill Industrial Estate



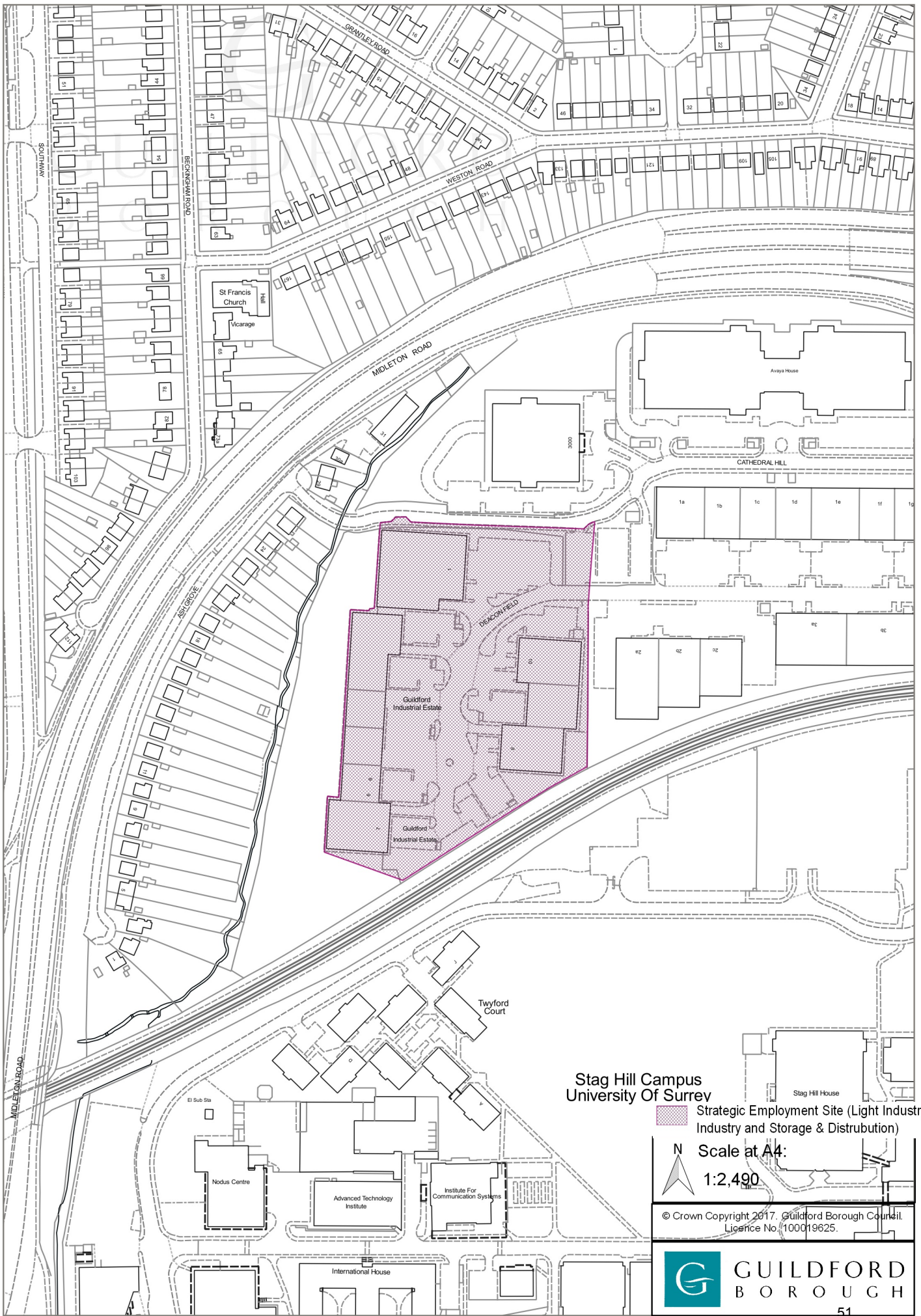
Strategic Employment Site (Light Industry, Industry and Storage & Distribution)

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Surrey Space Centre



Guildford Industrial Estate, Deacon Field



Stag Hill Campus
University Of Surrey

Strategic Employment Site (Light Industry, Industry and Storage & Distribution)

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Woodbridge Meadows

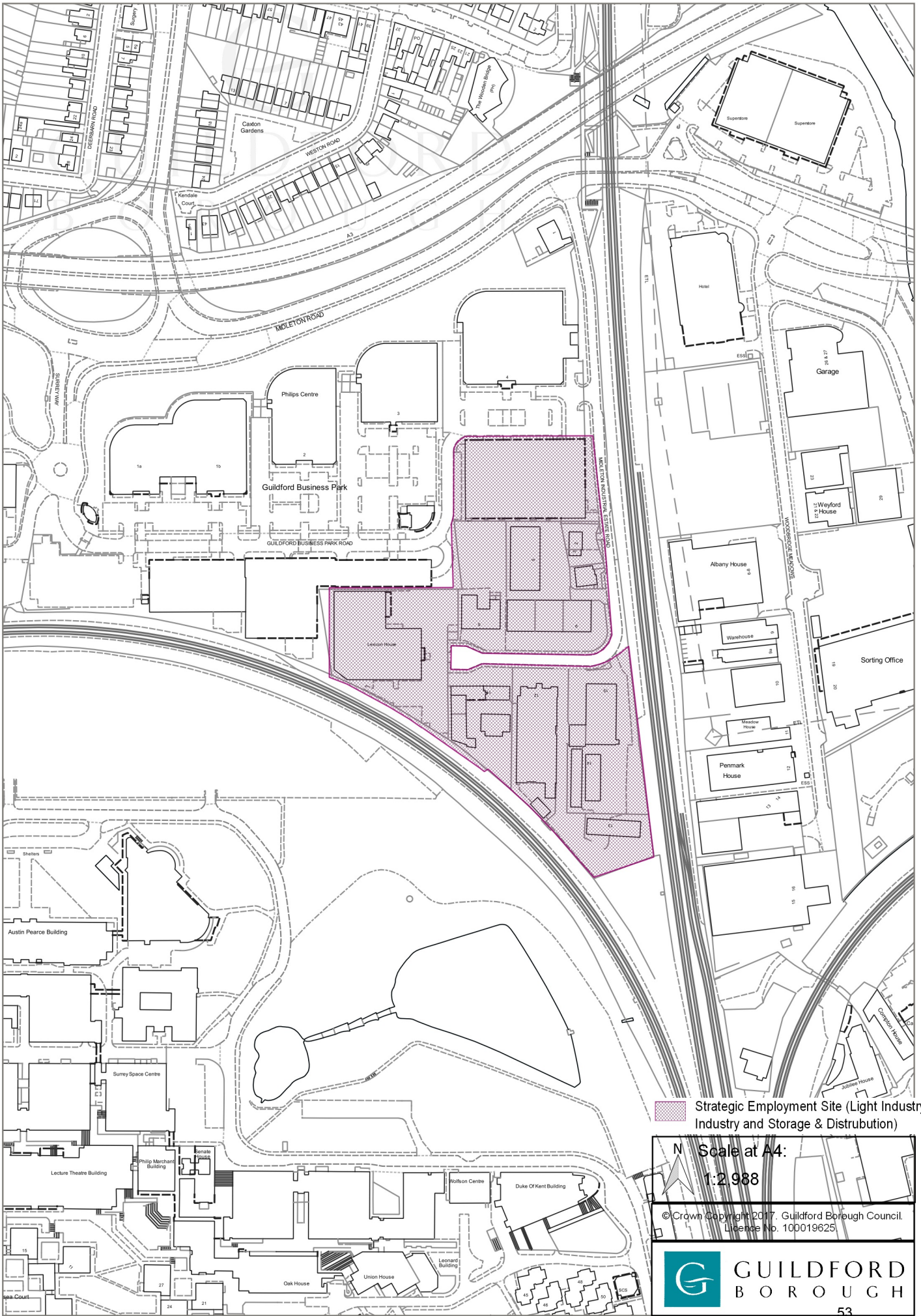



Strategic Employment Site (Light Industry, Industry and Storage & Distribution)

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Midleton Road Industrial Estate

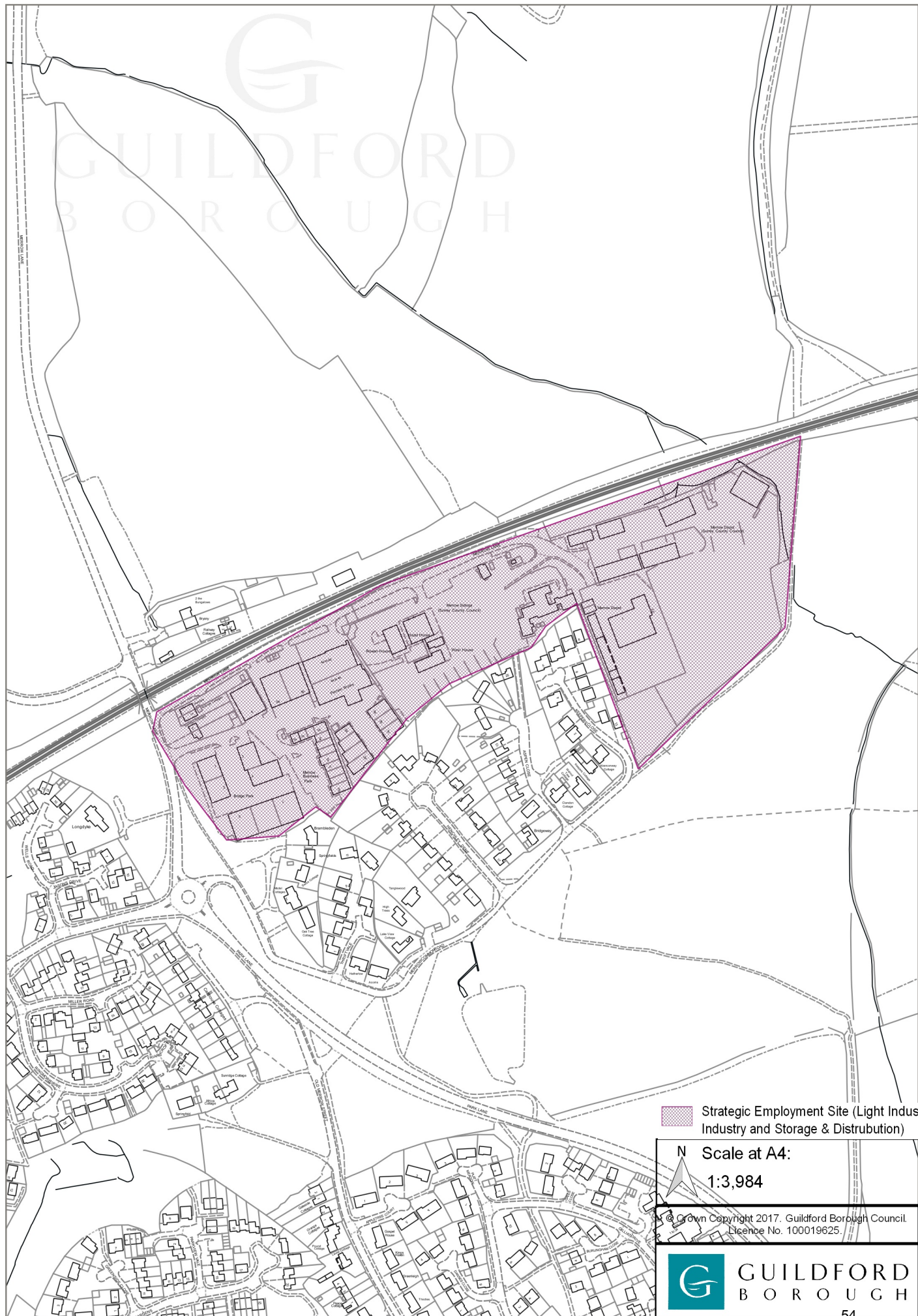


 Strategic Employment Site (Light Industry, Industry and Storage & Distribution)

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Merrow Lane (incl Perram Works, Bridge Park, Merrow Business Centre, SCC depot)

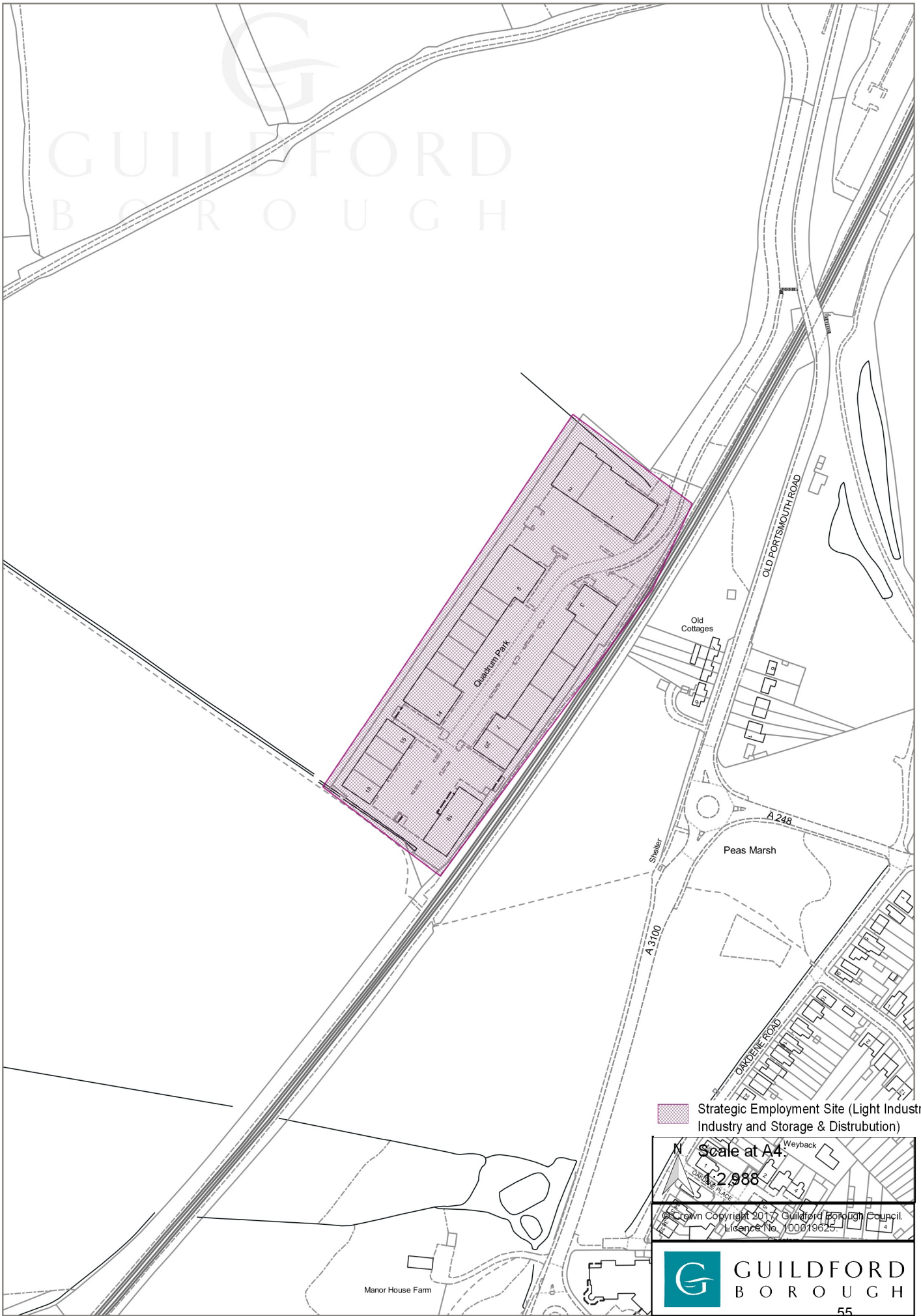


Strategic Employment Site (Light Industry, Industry and Storage & Distribution)

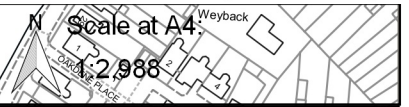
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Quadrum Park, Peasmarsh



Strategic Employment Site (Light Industry, Industry and Storage & Distribution)



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Woodbridge Park, Woodbridge Road

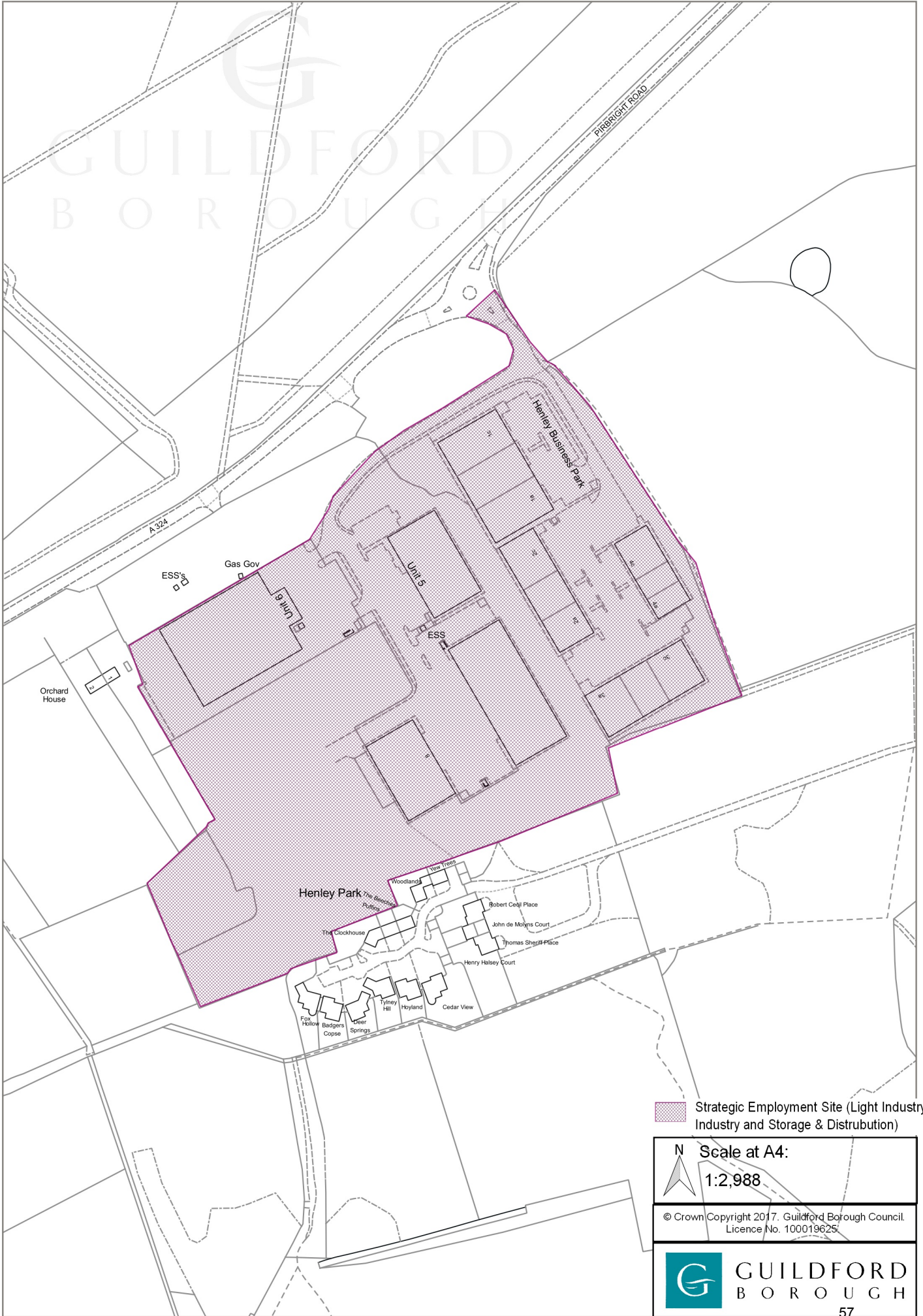



Strategic Employment Site (Light Industry, Industry and Storage & Distribution)


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Henley Business Park, Normandy



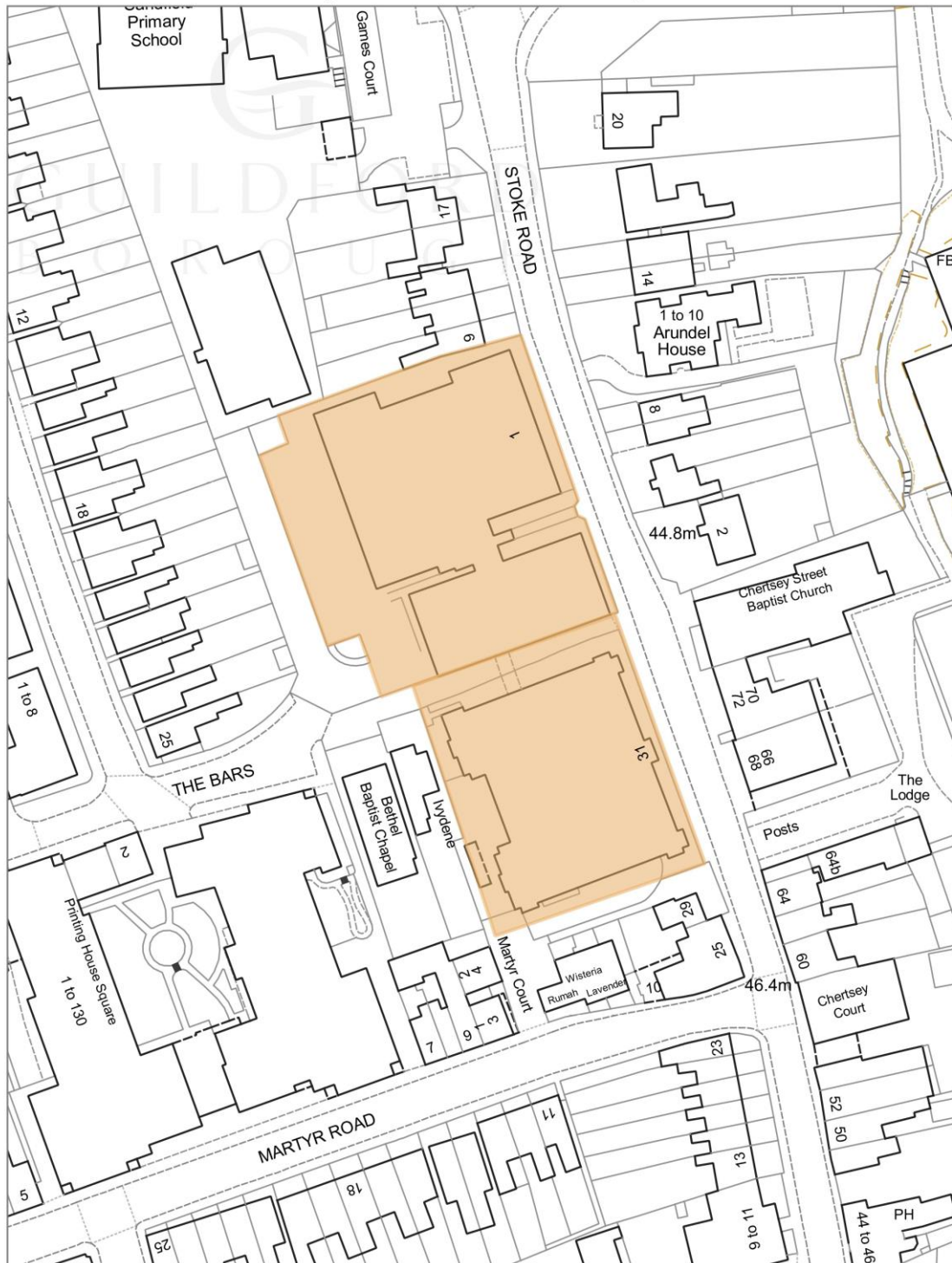
 Strategic Employment Site (Light Industry, Industry and Storage & Distribution)

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Locally Significant Employment Site Maps

31 Chertsey Street and 1-7 Stoke Road, Guildford



Legend

 Locally important employment site



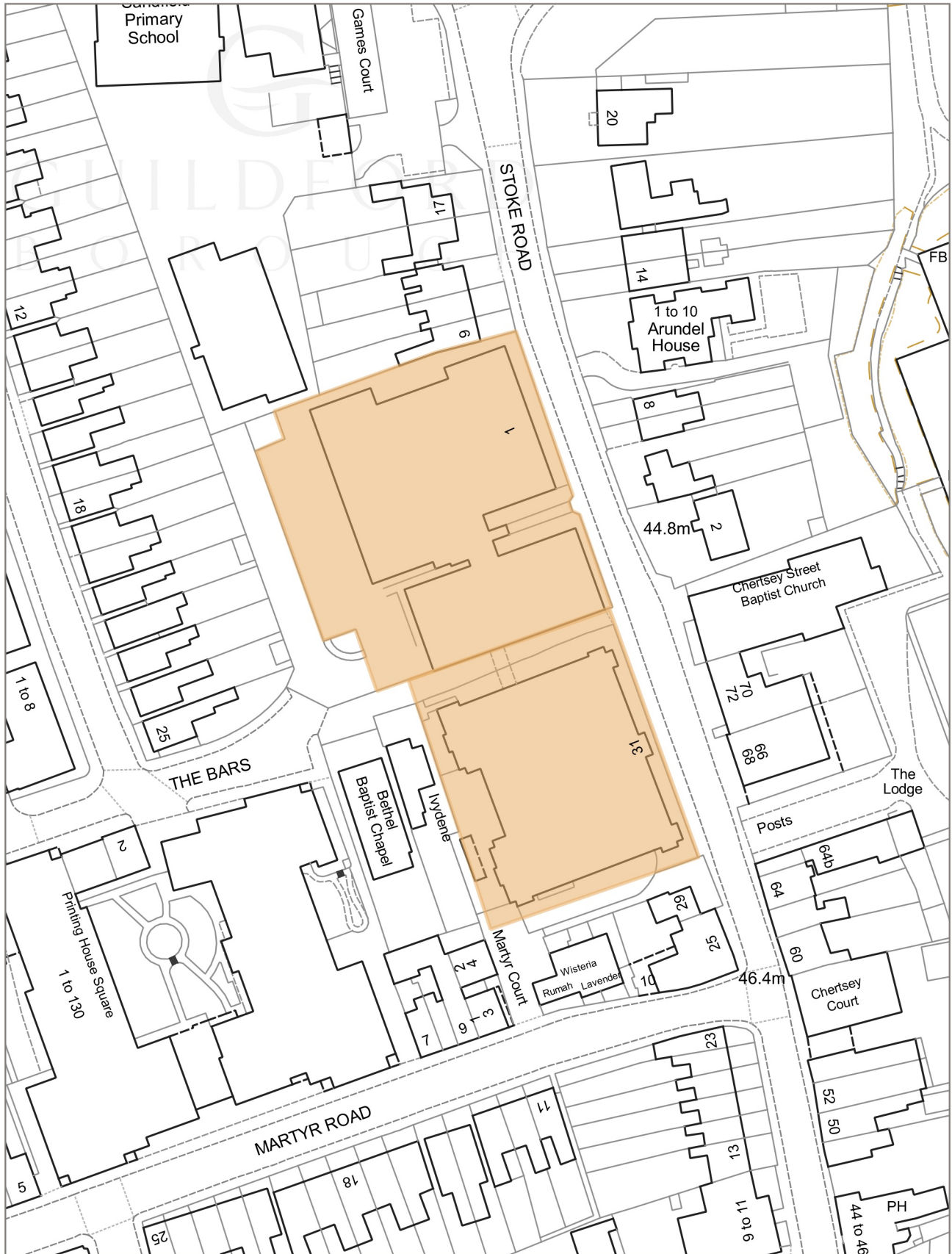
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31 Chertsey Street and 1-7 Stoke Road, Guildford



Legend

 Locally important employment site



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65 Woodbridge Road, Guildford



Legend

 Locally important employment site



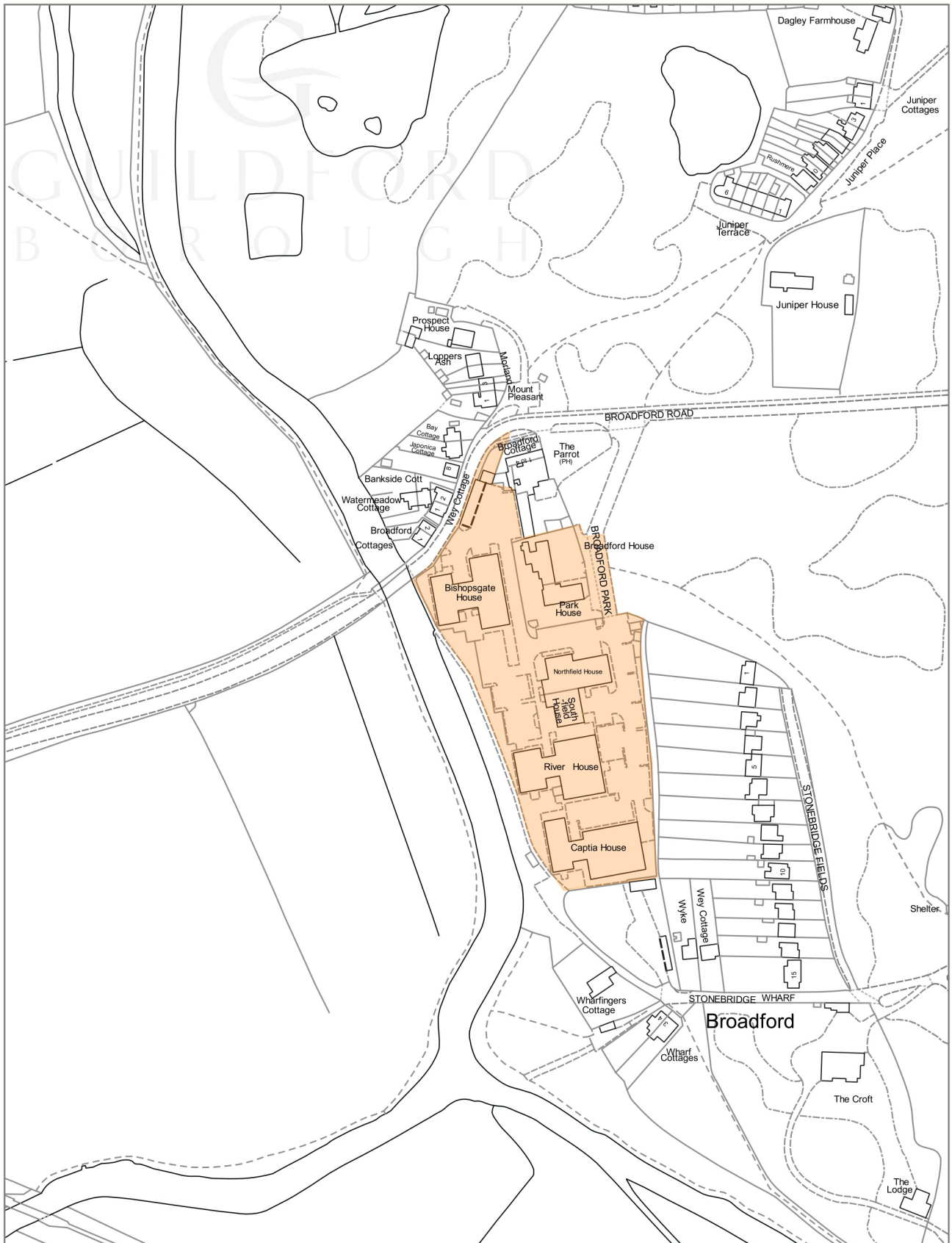
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60

Broadford Business Park



Legend

 Locally important employment site

Publication Date: 2017-05-16



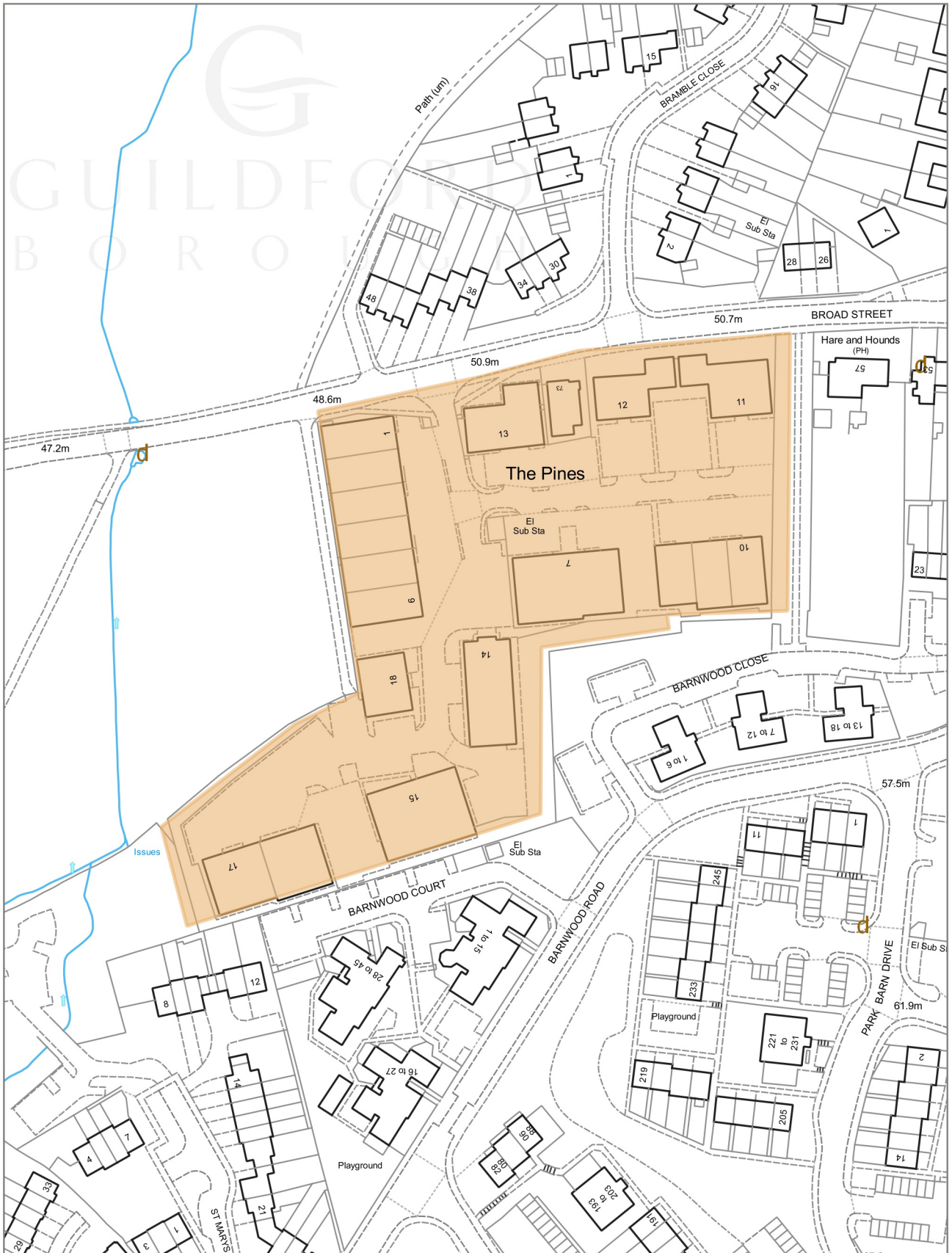
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The Pines Trading Estate, Broad Street



Legend

 Locally important employment site



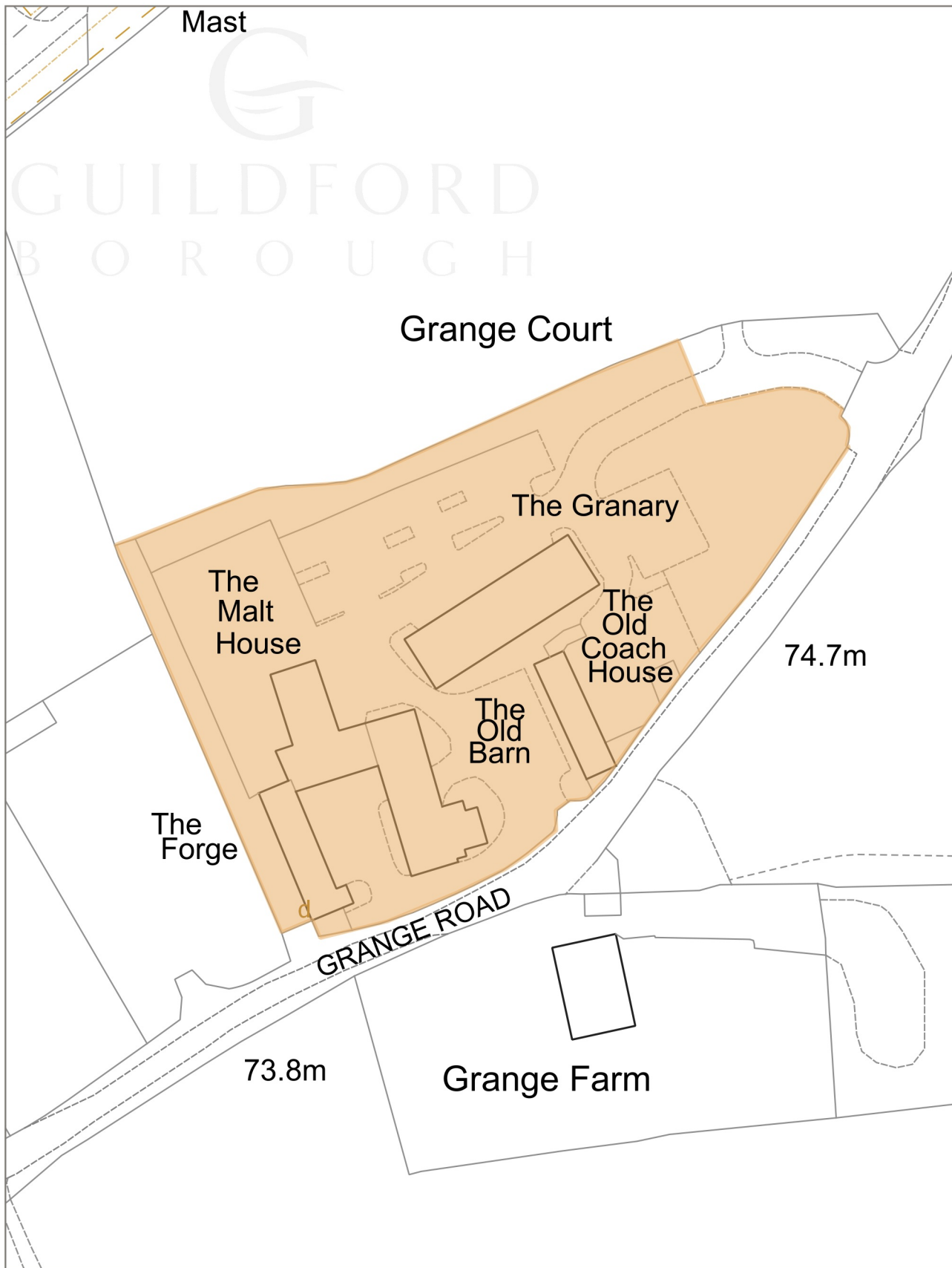
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Grange Court, Tongham



Legend

 Locally important employment site



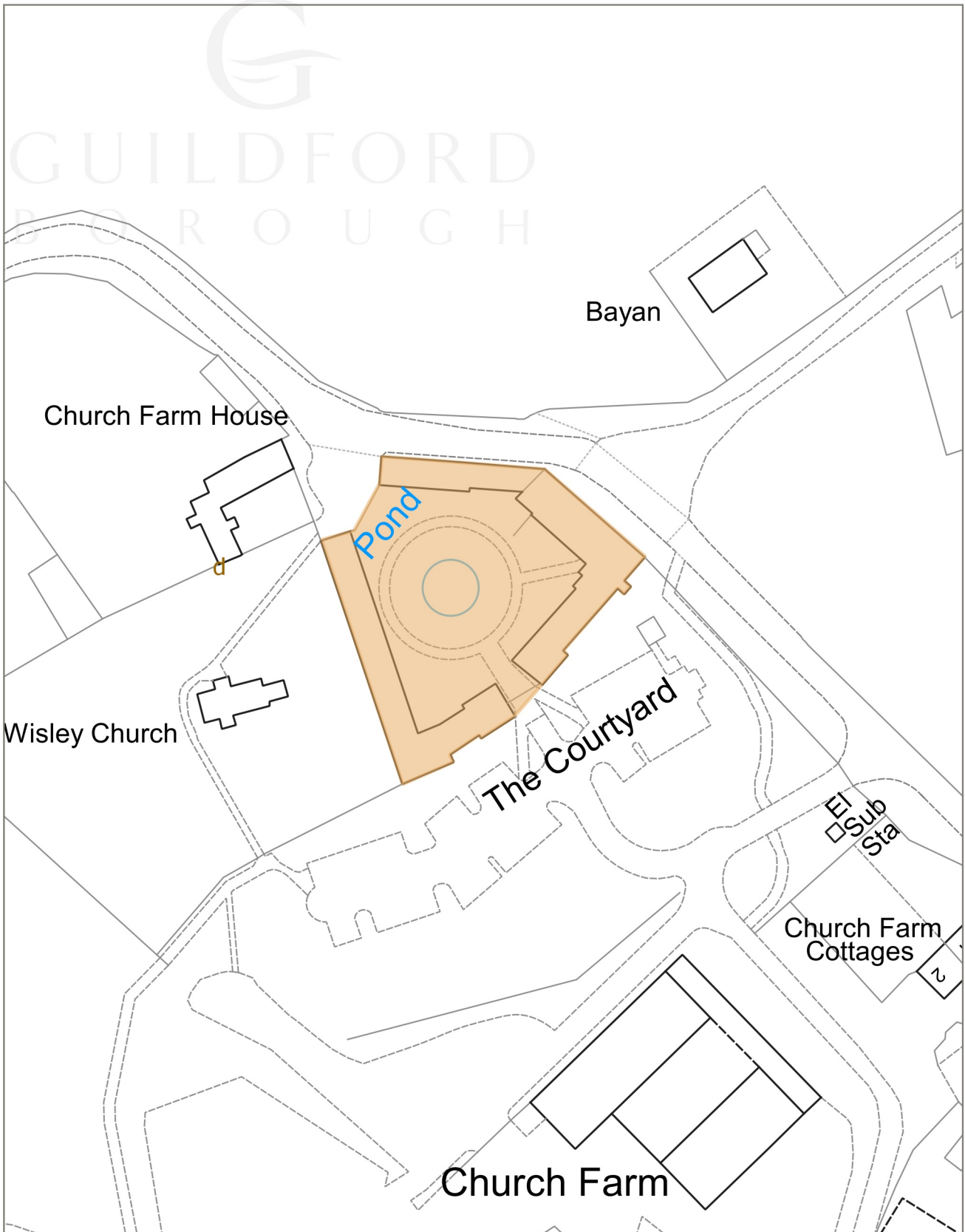
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The Courtyard, Wisley



Legend

 Locally important employment site



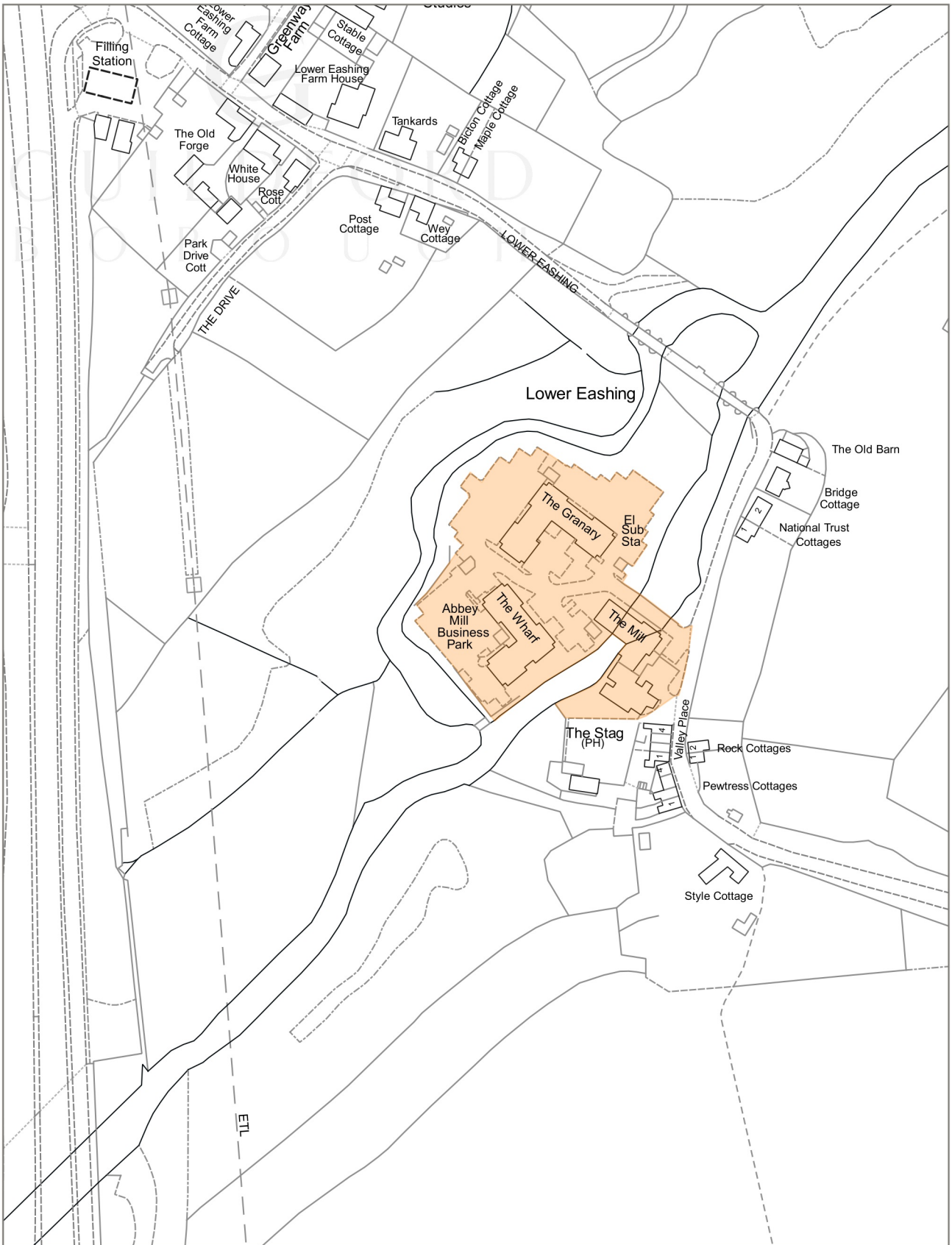
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Abbey Business Park, Eashing



Legend

 Locally important employment site

Publication Date: 2017-05-16



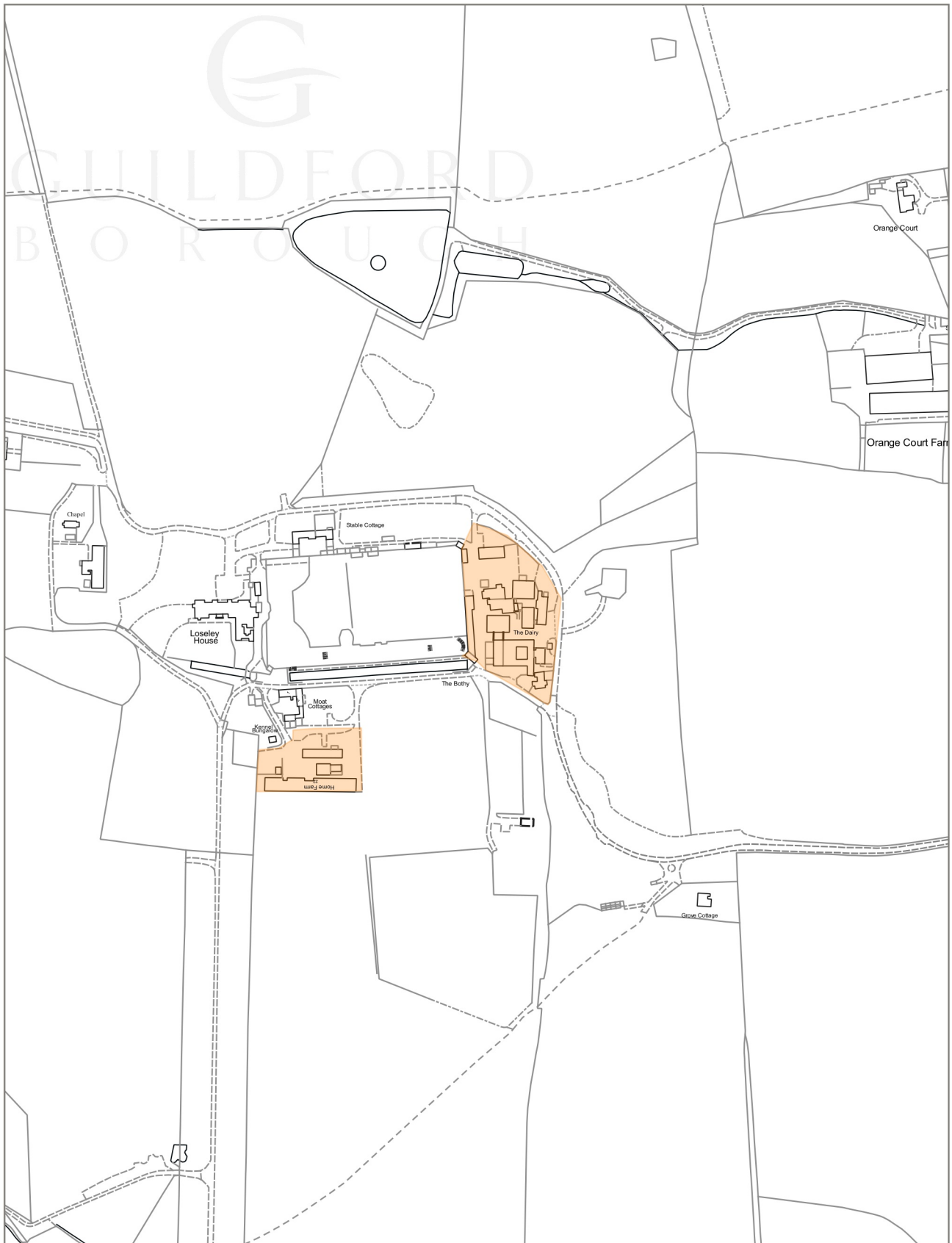
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Home Farm, Losely Park



Legend

 Locally important employment site

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