

Annual Monitoring Report

Guildford Borough Council

1 April 2019 – 31 March 2020

Published February 2021



GUILDFORD
B O R O U G H

Executive Summary

The Annual Monitoring Report ('AMR') has been prepared in accordance with the requirements of national legislation (the Localism Act 2011, the Town and Country Planning (Local Planning) England Regulations 2012 and the Planning and Compulsory Purchase Act 2004) and the direction of national Planning Practice Guidance ('PPG')¹.

Monitoring is an essential part of the planning process, providing an opportunity to review the performance of planning policies in the context of set objectives and indicators. Annual Monitoring Reports are required to report on a range of specific topics and outline progress against certain targets; including, among other things, providing information on the Council's:

- progress in plan-making activities,
- activity in relation to the duty-to-cooperate,
- implementation of policies in the Local Plan, and
- implementation of neighbourhood plans.

This Annual Monitoring Report (2019 – 2020) covers the Monitoring Period between 1 April 2019 to 31 March 2020.

The Local Plan: Strategy and Sites (2015 - 2034) was adopted on 25th April 2019. Some Development Management policies from the Local Plan (2003) were not superseded and remain in effect. This AMR discusses the policies and performance indicators that formed the adopted development plan during that time and data is available to assess.

The Local Plan: Strategy and Sites (2015 - 2034) was subject to Judicial Review, lodged by three separate claimants. The claims were heard at the High Court, where the Judge Sir Duncan Ouseley dismissed all three claims. Further, an appeal against this decision was lodged and again dismissed.

The Council has undertaken data migration to a new monitoring database during this monitoring period. The new database will support the collection and analysis of data required to assess performance against the Monitoring Indicators introduced in the Local Plan: Strategy and Sites (2015 – 2034). The initial set-up and transfer of data to this new system is complete and the collection of new forms of data to support monitoring the new Indicators is progressing. The next AMR should therefore include the full range of monitoring indicators for the Local Plan: Strategy and Sites (2015 – 2034).

Further information

For further information please use the information below:

- Visit the Local Plan Webpage at:
<https://www.guildford.gov.uk/localplan>
- Email us at: planningpolicy@guildford.gov.uk, or
- Phone us on: 01483 444 471

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¹ Available online at: <https://www.gov.uk/government/collections/planning-practice-guidance>.

1. Introduction

What is an Annual Monitoring Report?

- 1.1. The Annual Monitoring Report (2019/20) ('AMR') contributes to the suite of documents that comprise and support the Development Plan for Guildford Borough Council ('the Council'). The purpose of the AMR is to review the progress of development activity and the effectiveness of Local Plan policies in achieving their objectives.
- 1.2. The AMR has been prepared in accordance with the requirements of national legislation (the Localism Act 2011, the Town and Country Planning (Local Planning) England Regulations 2012 and the Planning and Compulsory Purchase Act 2004) and the direction of national Planning Practice Guidance. Annual Monitoring Reports are required to report on a range of specific topics and outline progress against certain targets; including, among other things, providing information on the Council's:
 - progress in plan-making activities,
 - activity in relation to the duty-to-cooperate,
 - implementation of policies in the Local Plan, and
 - implementation of neighbourhood plans.

What is included in an Annual Monitoring Report?

- 1.3. National Planning Practice Guidance requires that:

Local planning authorities must publish information at least annually that shows progress with Local Plan preparation, reports any activity relating to the duty to cooperate and shows how the implementation of policies in the Local Plan is progressing².
- 1.4. In meeting these obligations, this AMR includes discussion of, among other things:
 - the monitoring of policy indicators as set out in the Local Plan;
 - the progress of each document in the Local Development Scheme (LDS), including reasons for lack of progress where appropriate;
 - the adoption of Development Plan Documents and Supplementary Planning Documents;
 - the principal activities undertaken in relation to the duty-to-cooperate;
 - monitoring information in respect of Section 106 Obligations and other financial considerations; and
 - monitoring information in relation to the development of housing, economic and other key land uses, including consideration of the self-build and custom housebuilding register.
- 1.5. This AMR reports on the financial year from 1st April 2019 to 31st March 2020 (the monitoring period).

² PPG Paragraph 027; Reference ID: 12-027-20170728.

- 1.6. The Council adopted the Local Plan: Strategy and Sites (2015 – 2034) ('LPSS') on 25 April 2019. This is during the Monitoring Period covered in this AMR. The LPSS identifies various policy targets and key performance indicators to measure the effectiveness of the newly-adopted policies. However, this AMR is not able to report on some of these performance indicators. Although the new monitoring database has been set-up, there is an initial delay in reporting due to the lack of available data on some of these indicators. Our work toward capability to report on all Monitoring Indicators is currently ongoing, with the aim to be able to report on further monitoring indicators in subsequent Monitoring Periods.

How will the Annual Monitoring Report be used?

- 1.7. Alongside other evidence-base documents, the AMR comprises one of the suite of documents that supports the Council's development plan.
- 1.8. National Planning Practice Guidance ('PPG') provides a short commentary on the role of the Monitoring Report³. Importantly, the AMR should be designed to enable communities and interested parties to remain aware of the Council's progress in development planning and delivery; including its plan-making activities and implementation of neighbourhood plans that have been brought into force. The AMR may also be used to help the Council determine whether there is a need to undertake a partial or full review of the Local Plan.

³ PPG Paragraph 027; Reference ID: 12-027-20170728.

2. Policy Context

The Development Plan

- 2.1. The Council's development plan comprises a number of documents, including:
- The Local Plan: Strategy and Sites (2015 – 2034),
 - The non-superseded saved policies of the Guildford Borough Local Plan (2003),
 - Neighbourhood Plans that have passed a referendum of local residents,
 - Surrey Minerals and Waste Plans, and
 - Saved policy NRM6 of the South East Plan 2009.
- 2.2. National legislation (the Town and Country Planning Act 1990 and the Planning and Compulsory Purchase Act 2004) requires that “applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise”⁴.
- 2.3. In the determination of planning applications, national legislation requires that the Council must give great weight to its development plan policies, according to their degree of consistency with the NPPF (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given)⁵. Importantly, Councils may also give emerging policies some degree of weight in accordance with criteria outlined in the NPPF at paragraph 48. The Council must also give significant weight to other primary material considerations, such as the NPPF itself and the Council's own Supplementary Planning Documents, among other things.
- 2.4. Local Planning Authorities are required to identify in their Annual Monitoring Reports where the authority is not implementing a policy specified in a local plan and provide justification for this⁶. During the monitoring period being reported, the Council applied all of the saved policies in the Local Plan (2003) where relevant, in so far as they accorded with the NPPF. Policies which did not accord with the NPPF were also considered in the decision-making process and provided weight accordingly.

Local Development Scheme

- 2.5. The Local Development Scheme ('LDS') sets out the Council's timetable for producing new planning documents. The Council's adopted LDS (May 2020) is available to view at the following link: <https://www.guildford.gov.uk/lds>. The 2020 LDS was adopted on 26th May 2020, which is beyond this monitoring period.
- 2.6. Where the Council's Local Development Scheme does not reflect the likely trajectory of the production of planning documents, it is required to set out the reasons for the delay. The Regulation 18 consultation for the Local Plan: Development Management Policies was undertaken in accordance with the Local Development Scheme. This consultation was slightly delayed due to the outbreak of COVID-19 and the need to update its Statement of Community Involvement.

⁴ NPPF Paragraph 2.

⁵ NPPF Paragraph 213.

⁶ See Regulation 34 of the Town and Country Planning Regulations (2012).

- 2.7. Following this, the 'LDS' was not updated for the stages after Regulation 18 consultation to reflect this delay. The Regulation 19 consultation, which the Local Development Scheme states would be consulted upon in March 2021 is no longer realistic and will occur in 2021/22 instead. Principally, this is due to consequential delays within the Regulation 18 consultation process and further time required for drafting and finalising the Regulation 19 policies than had been anticipated. The Local Development Scheme will be updated to reflect this delay when there is greater certainty regarding the timescales.
- 2.8. Whilst progressing the Local Plan: Development Management Policies, significant progress also has been made on finalising and adopting the Town Centre Views SPD (adopted 24 September 2019), Strategic Development Framework SPD (adopted 21 July 2020) and Climate Change, Sustainable Design, Construction and Energy SPD (adopted 22 September 2020).

Status and progress of the New Local Plan

- 2.9. Guildford Borough Council has been developing a new Local Plan since 2012. The new Local Plan is intended to comprise two parts. Part 1 is the 'Strategy and Sites' document, which contains the vision, objectives and strategy for the borough up to 2034. Part 2 is the 'Development Management Policies' document, which provides greater detail in how proposals should be determined and developed.
- 2.10. The Local Plan: Strategy and Sites (2015 – 2034) was adopted on 25th April 2019 and constitutes Part 1 of the Local Plan. The policies in this plan are applied full weight in the determination of planning applications. The 'Development Management Policies' part of the Local Plan is currently being produced by the Council but does not yet carry any material weight in the determination of planning applications.
- 2.11. The 'Development Management Policies' plan was subject to a seven week 'Regulation 18' consultation from 3 June to 22 July 2020⁷. The consultation responses are currently being reviewed and the draft policies are being prepared for a minimum six week 'Regulation 19' consultation in 2021/22.
- 2.12. The Local Plan: Strategy and Sites (2015 – 2034) ('LPSS') was adopted in April 2019. The Council's adopted Development Plan policies during the monitoring period relate to the LPSS, the non-superseded saved policies of the Local Plan (2003) and the other sources outlined in paragraph 2.1 (above). However, the LPSS introduced a suite of new Monitoring Indicators that the Council was unable to collect data for at the time. Although the new monitoring database is now established, the data is not yet available to report on many of these Indicators. As such, this AMR discusses those policies and performance indicators that data is available for. The intention is to progress toward reporting on all the adopted policies in the Local Plan: Strategy and Sites (2015 – 2034) in subsequent reports as the data becomes available.

⁷ See Regulation 18 of the Town and Country Planning Regulations (2012). Available online at: www.legislation.gov.uk/ukxi/2012/767/regulation/18/made.

Neighbourhood Development Plans and Orders

- 2.13. Neighbourhood planning was introduced through the Localism Act (2011). New powers were introduced that allowed qualifying bodies⁸ to produce neighbourhood plans and neighbourhood development orders. Neighbourhood plans allow communities to set planning policies for their area.
- 2.14. Once adopted, neighbourhood plans become part of the Council's Development Plan. They must be considered when planning decisions are made, along with the Local Plan and national planning policy.
- 2.15. During the monitoring period, the Council has not designated any additional Neighbourhood Areas. Therefore, nine Neighbourhood Areas remain designated, covering the parishes of Albury, East Horsley, West Horsley, Puttenham, Send and Seale and Sands, and the wards of Burpham and Lovelace (Lovelace encompasses the parishes of Ockham, Ripley and Wisley)⁹.
- 2.16. During the monitoring period, the Council has not adopted any further Neighbourhood Plans. Due to the Coronavirus Act 2020, local polls (including referendums) will not be held until 6th May 2021. This has halted the process for the plans that have been through examination and are currently awaiting referendum. These include the Parishes of Lovelace, Send and Puttenham. The Council are currently looking for a suitable date to hold these referendums.
- 2.17. Three other Parish Councils are currently working to produce Neighbourhood Plans for their respective Neighbourhood Areas. The parishes of Albury and Seale and Sands are at the plan-making stage, whereas West Clandon have submitted a Plan to the Council which is awaiting Regulation 15 Consultation. The Council is supporting this process by providing advice and guidance. The Council is also talking to other prospective qualifying bodies to help them decide whether they would like to apply for a neighbourhood area designation in order to undertake neighbourhood planning.

Supplementary Planning Documents

- 2.18. The Council adopted one Supplementary Planning Document ('SPD') during the monitoring period; the Guildford Town Centre Views SPD (2019), which was formally adopted on 24th September 2019 via Executive Council decision. The document is available to view online at: <https://www.guildford.gov.uk/localplan/spd>.
- 2.19. The Strategic Development Framework SPD was adopted in July 2020, as well as the Climate Change, Sustainable Design, Construction and Energy SPD in September 2020. Both of these were adopted beyond the end of the monitoring period. Other SPDs are set to be produced in line with commitments in the adopted Local Plan: Strategy and Sites however there are no timescales currently agreed.

⁸ Parish or Town Councils and designated Neighbourhood Forums. More information is available online at: <https://www.guildford.gov.uk/neighbourhoodplanninginformation>.

⁹ The Neighbourhood Areas can be seen on the interactive map at: <https://www.guildford.gov.uk/neighbourhoodplanninginformation>.

3. Monitoring Indicators

Housing

- 3.1. The following section considers those monitoring indicators relating to the development of homes in the borough.

Overall Housing Numbers

Annual Housing Requirement

- 3.2. The Local Plan: Strategy and Sites (2015 - 2034) identified a total housing delivery target of 10,678 units over the plan period. This equates to an annual housing target of 562 units throughout the plan period.
- 3.3. The Town and Country Planning Regulations (2012) require that Annual Monitoring Reports outline progress against targets for the monitoring period (2019 – 2020), and since that target was first published. The ‘LPSS’ confirms that the Council’s Objectively Assessed Need (‘OAN’) is 562 dwellings over the plan period (2015-2034).

Table 1: Previous Housing Completions¹⁰

Monitoring Period	2015/16	2016/17	2017/18	2018/19	2019/20	Total
Completions	387	294	299	351	352	1,683
Delivery against target (562)	-175	-268	-263	-211	-210	-1,120

- 3.4. Table 1 above demonstrates that there has been an historic undersupply of housing in Guildford. The annual target of 562 has not been met in a single year of the plan period (2015 – 2034), providing an undersupply of 1,120 homes to date. The Inspector examining the LPSS accepted that this backlog should be met over the plan period (called the Liverpool approach) rather than in the first five years (called the Sedgefield approach). However, annual completions in the borough are demonstrating a general upward trend and are projected to grow significantly since the adoption of the Local Plan: Strategy and Sites in 2019¹¹.

Planning Permissions Granted for New Homes

- 3.5. The number of homes that have been granted planning permission this year is lower than the previous monitoring period. However, the previous monitoring period benefitted from the granting of a small number of planning applications for a large number of dwellings. The largest application that was approved during this monitoring period was 19/P/01541: Land rear of Chicane and Quintons, Ockham Road North. This is significantly lower than the largest planning permission approval in the previous monitoring period (17/P/02592), which was for 481 homes. This year, the approvals comprise mostly smaller planning permissions.

¹⁰ Housing completions data for monitoring periods preceding 2015/2016 is available in previous monitoring reports, available at: <https://www.guildford.gov.uk/localplan/monitoring>.

¹¹ As demonstrated in Appendix 8 of the Guildford borough Land Availability Assessment (2020), available at: <https://www.guildford.gov.uk/localplan/housing>.

Table 2: New Homes Granted Permission in Guildford Borough Each Year¹²

Monitoring Period	Number of new market homes granted permission (net)	Number of affordable homes granted permission (net)
2015 / 2016	272	43
2016 / 2017	577	174
2017 / 2018	1062	233
2018 / 2019	609	285
2019 / 2020	553	165

Outstanding Capacity

- 3.6. 'Outstanding capacity' refers to the number of new homes on sites with planning permission that have not yet been built. At the base-date of this report (1st April 2020), sites within the borough had an 'outstanding capacity' of 3,169¹³ homes, as confirmed within the Land Availability Assessment (2020)¹⁴ ('LAA').

Five-Year Housing Land Supply

- 3.7. As at 1 April 2020, the Council has a Five-Year Housing Land Supply position of 6.42 years, as confirmed in the Land Availability Assessment (2020).
- 3.8. Detailed assessment of the Council's Five-Year Housing Land Supply is set out in the Five-Year Housing Land Supply document (5YHLS)¹⁵.
- 3.9. Briefly, section 4 of the LAA sets out the components of housing supply that are anticipated to be delivered within the first five-year period (namely, sites assessed as being 'deliverable'). This supply comprises a mixture of outstanding planning permissions and potential development sites as identified in the LAA at Appendix 2: Realistic Candidates for Development.
- 3.10. Table 3 (below) provides a breakdown of how the five-year housing supply has been calculated. Please refer to the LAA for detailed assessments of the various inputs.

¹² These figures include permissions that have since expired.

¹³ Although Planning Permission Ref: 04/P/00576 has technically commenced, our understanding is that this will not be completed. Therefore, the 63 homes have been subtracted from the total number of homes with outstanding permission to reach the figure of 3,038.

¹⁴ Please refer to the 'outstanding capacity' section of the Land Availability Assessment (2019) for more detail. The LAA is available online at: <https://www.guildford.gov.uk/localplan/housing>.

¹⁵ Available online at: <https://www.guildford.gov.uk/article/22879/Monitoring-the-Local-Plan>.

Table 3: Five-Year Housing Land Supply Calculation

A	Housing requirement (2015 - 2034)		10,678
B	Annual requirement	A / 19 =	562
C	Completions required (1 April 2015 - 31 March 2020)	B * 4 =	2,810
D	Completions delivered (1 April 2015 - 31 March 2019)		1,683
E	Accrued deficit (1 April 2015 - 31 March 2020)	C - D =	1,127
F	Deficit annualised over the remaining plan period (Liverpool approach)	E / 15 =	81
G	Annual housing requirement taking account of deficit	B + F =	643
H	Housing requirement (1 April 2020 - 31 March 2025)	G * 5 =	3,213
I	Plus 20% buffer due to significant under delivery	H * 1.2 =	3,855
J	Housing supply (1 April 2020- 31 March 2025)		4,950
K	Five-year housing land supply	(J / I) *5 =	6.42

Housing Delivery Test ('HDT')

- 3.11. The HDT compares the net homes delivered over three years to the homes that should have built over the same period (the housing requirement). Guildford's HDT results for the 2019 measurement (covering 2016/17, 2017/18 and 2018/19) were published on 13 February 2020. The HDT measurement for Guildford is 83% of its housing requirement over the previous three years.
- 3.12. The NPPF indicates that in cases where housing delivery has fallen below 95% of the Local Planning Authority's housing requirement during the three-year period in question, it should prepare an action plan to assess the causes of under-delivery and identify actions to increase delivery in future years¹⁶.

Housing Trajectory

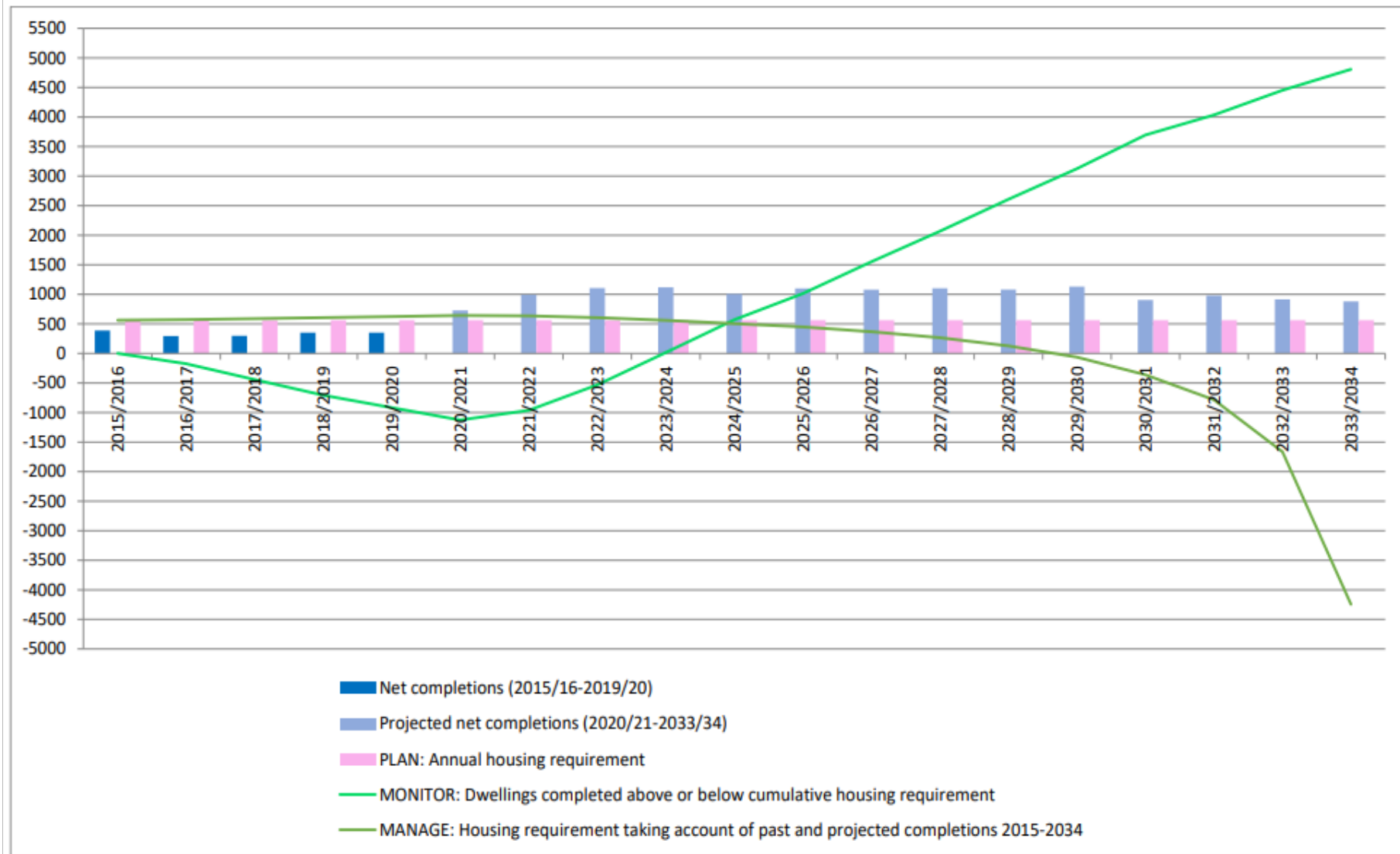
- 3.13. Appendix 8 of the Land Availability Assessment (2020) includes the anticipated Housing Trajectory over the remaining Local Plan period (2020– 2034). The Housing Trajectory represents the anticipated phasing of sites with planning permission and potential development sites identified in the LAA. The trajectory is included below, on page 12 of this document.
- 3.14. The accompanying graph, on page 13 of this document, demonstrates the relationship that the anticipated housing delivery has with the borough's annual housing target. The green 'Monitor' line identifies the extent to which the anticipated housing delivery is above or below the cumulative housing requirement for the same period. This provides the cumulative deficit or surplus as at the beginning of each year, which would need to be taken account of in rolling forward the five-year land supply calculations. If the trend line is positive (above zero), housing delivery is ahead of target, if it is negative (below zero), then housing delivery is behind target.

¹⁶ The Council's Housing Delivery Action Plan can be viewed online at: <https://www.guildford.gov.uk/localplan/monitoring>.

Housing Trajectory

Category	Past completions	1 - 5 YEARS					6 - 10 YEARS					11 - 15 YEARS					Total
	2015/2016 - 2019/20	2020/2021	2021/2022	2022/2023	2023/2024	2024/2025	2025/2026	2026/2027	2027/2028	2028/2029	2029/2030	2030/2031	2031/2032	2032/2033	2033/2034	2034/2035	
Completions	1683																1683
C3 Outstanding capacity (Commenced)	0	285	207	79	79	79	0	0	0	0	0	0	0	0	0	0	729
C3 Outstanding capacity (Approved) - detailed permissions	0	53	426	617	363	316	0	0	0	0	0	17	18	18	18	18	1864
C3 Outstanding capacity (Approved) - outline permissions	0	20	30	0	0	0	103	104	106	106	107	0	0	0	0	0	576
Student Accommodation and Care Homes (C3 equivalent) - detailed permissions	0	392	303	75	76	76	0	0	0	0	0	0	0	0	0	0	922
Lapse Rate Application (-5%) on non-commenced Permissions	0	-23	-38	-34	-22	-20	-5	-5	-5	-5	-6	-1	-1	-1	-1	-1	-168
LAA sites																	
Student Accommodation and Care Homes (C3 equivalent)	0	0	0	0	0	0	0	0	56	0	0	0	0	36	0	0	92
Windfall	0	0	0	48	97	97	97	97	97	97	97	97	97	97	97	97	1212
Rural exception sites	0	0	0	6	6	6	6	6	6	6	6	6	6	6	6	6	78
Guildford Town Centre	0	0	0	40	0	0	147	147	147	147	148	16	16	16	16	17	857
Guildford urban area (excluding SARP and urban extensions)	0	0	0	48	49	12	12	14	14	14	13	14	14	15	15	15	249
Ash and Tongham urban area (excluding urban extension)	0	0	0	1	1	2	2	2	2	2	2	5	5	5	5	5	39
Villages (excluding new village)	0	0	65	202	319	237	125	25	25	26	26	11	11	11	11	12	1106
Previously developed land in the Green Belt	0	0	0	0	0	0	50	50	16	0	0	0	0	0	0	0	116
Strategic site allocations/location	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Slyfield Area Regeneration Plan (SARP)	0	0	0	0	0	0	150	150	150	150	150	150	200	200	200	0	1500
Guildford urban area extension (Gosden Hill)	0	0	0	0	0	0	50	100	100	150	150	150	150	150	150	200	1350
Guildford urban area extension (Blackwell Farm)	0	0	0	0	0	50	125	125	125	125	175	175	200	200	200	0	1500
Ash and Tongham urban extension	0	0	0	0	0	0	63	63	63	63	63	63	63	63	63	64	631
New village (former Wisley airfield)	0	0	0	25	150	150	175	200	200	200	200	200	200	100	100	100	2000
Total housing provision	1683	727	993	1107	1118	1005	1100	1078	1102	1081	1131	903	979	916	880	533	16336
Total within each period	1683			4950					5492					4211			16336

Housing Trajectory Graph



Provision of Affordable Homes

- 3.15. Affordable housing includes social rented, affordable rented and intermediate housing, provided to specified eligible households whose needs are not met by the market. The NPPF provides further information on Affordable Housing at Annex 2¹⁷.
- 3.16. The West Surrey SHMA: Guildford Addendum (2017) identifies that there are 517 households per annum who require financial support to meet their housing needs¹⁸.

Table 4: Affordable homes completed in Guildford borough

Monitoring Period	Number of new affordable homes (gross)
2011 / 2012	68
2012 / 2013	22
2013 / 2014	17
2014 / 2015	68
2015 / 2016	125
2016 / 2017	32
2017 / 2018	111
2018 / 2019	89
2019 / 2020	62

- 3.17. Table 4 (above) demonstrates that the number of affordable homes delivered during the monitoring period remains significantly below the annual affordable housing need figure as identified in the West Surrey SHMA Guildford Addendum Report (2017).
- 3.18. Policy H2 in the Guildford Local Plan Strategy and Sites (2019) requires that 40% of units are provided as affordable housing on sites of 11 homes or more in urban areas. In Designated Rural Areas, the Guildford Local Plan Strategy and Sites requires that 40% of units are provided as affordable housing sites on sites of more than 5 homes.

Table 5: Proportion of new homes approved by site size

Site size (Net number of homes)	Proportion of new homes approved per year						
	2013 / 2014	2014 / 2015	2015 / 2016	2016 / 2017	2017 / 2018	2018 / 2019	2019 / 2020
Less than 5	39%	16%	34%	83%	12%	11%	9%
6 – 15	22%	18%	26%	11%	11%	12%	7%
16 – 50	23%	8%	40%	3%	6%	-	15%
51 – 200	16%	8%	-	3%	-	23%	69%
200+	-	50%	-	-	71%	54%	-

¹⁷ The NPPF is available online at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

¹⁸ Available online at: https://www.guildford.gov.uk/newlocalplan/media/23816/West-Surrey-SHMA-Guildford-Addendum-Report-2017/pdf/West_Surrey_SHMA_Guildford_Addendum_Report_2017.pdf

Key Characteristics of Housing Completions

- 3.19. The Housing Delivery Topic Paper (2017) outlines a spatial hierarchy for new development within the borough, which identifies that Guildford Town Centre and the Urban Areas comprise the most sustainable locations for development and consequently the most suitable areas for higher density development.
- 3.20. Table 6 (below) illuminates that higher density development has been permitted within the Town Centre and Urban Areas, whilst lower density development has been permitted within the Villages, Countryside beyond the Green Belt, and the Green Belt.
- 3.21. Whilst it is important that consideration is given to the existing character of an area, it is important that land is used efficiently. The NPPF is clear, in paragraph 123, that new development should seek to deliver a significant uplift in the average density of residential development. Where sites are of an appropriate scale it may be preferable to not simply replicate the prevailing character. This is likely to be particularly pertinent on the strategic sites allocated in the new Local Plan.

Table 6: Average density (gross) of permissions for new homes (2019/20)

Location	Average Density of new homes (per ha.)
Guildford Town Centre (GTC)	175
Ash and Guildford Urban Area (excl. GTC)	63
Villages	27
Countryside Beyond Green Belt	14
Green Belt (outside settlements)	17
Borough total average	52

Brownfield land development ratio

- 3.22. Historically, a majority of housing completions have been developed on brownfield land in Guildford. This is likely to be due to the highly constrained nature of the borough with regards to its Green Belt and AONB land designations, in combination with a number of protected natural habitats such as the Thames Basin Heaths Special Protection Area ('TBHSPA').

Table 7: Ratio of completions on brownfield or greenfield land

Total Completions	Brownfield Land	Percentage (%) of total	Greenfield Land	Percentage (%) of total
352	127	36%	225	64%

- 3.23. Table 7 illustrates that the majority of new homes delivered in the borough during this monitoring period has been on greenfield land. A significant number of completions have been delivered during this monitoring period from a small number of large planning permissions on greenfield sites, including 87 units from the build-out of 17/P/02592: Land South of Ash Lodge Drive.

- 3.24. The ratio of development on brownfield land is likely to decrease throughout the plan period, particularly as a result of the site allocations as set out in the adopted Local Plan: Strategy and Sites (2015 – 2034), which allocates a number of strategic sites on greenfield land. However, opportunities for maximising brownfield land have been taken and the Local Plan does allocate a number of ‘Previously Developed’ sites, largely within the borough’s urban areas, which will continue to be delivered throughout the plan period. Further Previously Developed Land (‘PDL’), also known commonly as Brownfield Land, will continue to be identified for development through the Land Availability Assessment (‘LAA’) and the Brownfield Land Register.

Brownfield Land Register

- 3.25. Local Authorities are required to prepare, maintain and publish a Brownfield Land Register in accordance with the Town and Country Planning (Brownfield Land Register) Regulations 2017. The Register comprises a list of Previously Developed (Brownfield) sites that have the potential to accommodate residential development. This includes sites from various sources, including sites allocated in the Local Plan, whether they currently have planning permission or otherwise, provided they meet certain specified criteria.
- 3.26. Part 1 of the most recently published Brownfield Land Register was published on Friday 10 November 2020, containing 60 brownfield sites. The Brownfield Land Register is available on the Council’s website at:
<https://www.guildford.gov.uk/planningpolicy/brownfield-land-register>.

Type of new homes (net) granted planning permission (2019 / 2020)

Table 8: Type of homes granted planning permission (Gross) (2019 / 2020)

Type of Home	Number of new homes (gross)	Percentage of new homes (gross)
House	462	64%
Flat	133	18%

- 3.27. The West Surrey SHMA (2015) reports the breakdown of need for the various different size homes within the borough to be as follows:

	<u>Affordable Housing</u>	<u>Market Housing</u>
1 Bed Properties	40%	10%
2 Bed Properties	30%	30%
3 Bed Properties	25%	40%
4 Bed Properties (+)	5%	20%

The SHMA (2015) indicates that one-bed properties are of greatest need for affordable housing, whereas three-bed properties are of greatest need for market housing. Table 9 (below) identifies the mix of housing granted permission this monitoring year, which demonstrates that the need identified in the SHMA is broadly being achieved, though some of the categories are skewed toward either oversupply or undersupply.

Table 9: Mix of housing sizes granted planning permission (2019 / 2020)

Type of homes	Affordable Housing (%) (net)	Market Housing (%) (net)
One Bedroom	14%	31%
Two Bedroom	71%	28%
Three Bedroom	14%	21%
Four Bedroom+	1%	20%

Location of new homes granted permission

- 3.28. Table 10 (below) demonstrates the location of new homes granted permission during this monitoring period and shows the historic trend from previous Monitoring Reports.

Table 10: Distribution of new homes granted permission by location (net)

Location	Percentage of new homes granted permission					
	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20
Guildford Town Centre	2%	25%	27%	45%	3%	7%
Ash and Guildford Urban Area (excl. Town Centre)	27%	29%	31%	11%	10%	52%
Villages	9%	10%	8%	4%	5%	16%
Green Belt (outside settlements)	8%	12%	4%	39%	21%	24%
Countryside	51%	24%	24%	1%	61%	1%

The Loss of Homes

- 3.29. During the monitoring period, no planning permissions were granted which resulted in the net loss of dwellings. The Council intends to increase housing delivery in the borough, which means that applications involving the net loss of homes are generally refused. The number of homes lost through permissions remains generally low.

Housing for Different Groups in the Community

Housing for older people and people with disabilities

- 3.30. Housing for older people and people with disabilities may fall within any of the C2, C3 or Sui Generis land use classes. Land use class C2 (residential institutions) includes dwellings with an element of care, with residential care homes and nursing homes falling within this category.
- 3.31. The West Surrey SHMA Guildford addendum (2017) excluded the borough's population in residential care from the general household projections for C3 use housing and identified a separate need for 433 care home bed spaces between 2015 - 2034. Although there is no set target for C2 accommodation, the LPSS recognises the importance of, and need for, this type of accommodation in the borough. Importantly, the delivery of C2 accommodation now counts toward the council's housing supply in accordance with the Housing Delivery Test.
- 3.32. The West Surrey SHMA Guildford addendum Report (2017) identifies a need for 1,061 specialist homes for older persons between 2015 - 34. This forms part of our overall housing need for C3 use class housing.
- 3.33. No planning applications for C2 housing for older people and people with disabilities were approved during the monitoring period.

Housing for Students

- 3.34. The West Surrey SHMA Guildford addendum (2017) estimates the borough has a need for a maximum of 3,800 additional student bedspaces over the plan period (2015 – 2034). Within this figure, 2,090 students are assumed to live in student-halls on-campus, which leaves a need of approximately 428 additional off-campus C3 dwellings (or 23 dwellings per year) to accommodate the remaining 1,710 new students over the plan period. This figure rests on the assumption that there are circa four students per C3 household on average. The separately-identified student accommodation need for 428 C3 dwellings is included within the general housing need figures.
- 3.35. The Manor Park Masterplan for the University of Surrey (02/P/02505) shows 145,200 square metres of student and staff residential accommodation, which has capacity for approximately 4,171 bedspaces to be built. There have been no planning permissions for Purpose Built Student Accommodation (PBSA) on-campus over the monitoring period. However, it is worth noting that 477 bedspaces in PBSA at Manor Park were completed by September 2019 and another 674 completed by September 2020.
- 3.36. Table 13 (below) shows the planning permissions that have been granted during this monitoring period for purpose-built student accommodation. Further details can be viewed in the Land Availability Assessment (2019)¹⁹.

¹⁹ Available to view online at: <https://www.guildford.gov.uk/localplan/housing>.

Table 13: Planning permissions for purpose-built student accommodation 1 April 2019 to 31 March 2020

Application Reference	Date Approved	Address	Proposal
19/P/00267	04/07/2019	Kernal Court, Walnut Tree Close, GU1 4UD	Demolition of existing structures and construction of a part-4, part-5, part-7, part-8 storey student accommodation building (Sui Generis) and a basement plus part-4, part-5 storey Co-Living accommodation building (Sui Generis) with associated works including, parking, access, landscaping, plant, cycle and refuse enclosure. (Amendment to Planning Permission 18/P/01155 for an increase in Co-Living building from 4 to 5 stories (approximately 550mm in height) and an increase in Co-Living units from 85 to 113)

Self-build and Custom House Build

- 3.37. The Self-Build and Custom Housebuilding Act (2015) requires that local authorities keep a register of individuals and associations interested in acquiring a serviced plot(s) of land within their administrative area for the purpose of building houses to occupy as a main residence. The Council meets this obligation and publicises the register via its website (www.guildford.gov.uk/selfbuild). Local authorities must have regard to the register when carrying out their Planning, Housing, Regeneration and Land Disposal functions.
- 3.38. Self-build and Custom Housebuilding Planning Practice Guidance²⁰ requires that relevant authorities grant permission for enough suitable serviced plots of land to meet the demand for self-build and custom housebuilding in their area. The requirement is established with reference to the number of entries on Part 1 of the authority's register during the base period, which runs from 31 October to 30 October annually. At the end of each base period, authorities are provided with three years to grant permission for an equivalent number of plots of land that are suitable for self-build and custom housebuilding²¹.
- 3.39. To be placed on the register, applicants must be: aged 18 years or older, a British Citizen, a citizen of a European Economic Area (EEA) country or national of Switzerland; they must be seeking to acquire a serviced plot of land in Guildford borough to build a house to occupy as that individual's sole or main residence. In the case of associations, all individuals within the association must meet all of the criteria specified above.

²⁰ Available online at: <https://www.gov.uk/guidance/self-build-and-custom-housebuilding>.

²¹ PPG Paragraph 023; Reference ID 57-023-201760728.

- 3.40. In addition to the statutory criteria listed above, there is also additional eligibility criteria²² to go on Part 1 of the register as listed below. Applicants must:
- Have lived in the Borough for at least five years prior to their application;
 - Worked in full-time employment (greater than 16 hours per week) in the borough for at least three years and continue to do so, and;
 - Have the financial ability to purchase land for their own self-build or custom housebuilding project.

Table 14: Number of eligible applicants on Part 1 of the Self-build & Custom Housebuilding Register

Base Period	Number of eligible applicants
BP1: 1 April 2016 – 30 October 2016	5
BP2: 31 October 2016 – 30 October 2017	2
BP3: 31 October 2017 – 30 October 2018	8
BP4: 31 October 2018 – 30 October 2019	3
BP5: 31 October 2019 – 30 October 2020	0

- 3.41. Policy H1: Homes for All in the Local Plan: Strategy and Sites (2015 – 2034) requires that residential development proposals of 100 homes or more (gross) should provide 5% of the total homes available for sale as self-build or custom housebuilding plots whilst there remains an identified need.

Table 15: Permissions including self-build or custom housebuilding plots (2019 – 2020).

Application Reference	Date Approved	Address	Proposal
19/P/00634	3/12/2019	Land rear of Chicane and Quintons, Ockham Rd North, East Horsley	Outline application for the demolition of two dwellings and alteration to access to allow for outline consent with all matters reserved (except for means of access) for up to 110 dwellings and up to 99sqm of office floor space (Use Class B1a), open space, sustainable urban drainage system and associated landscaping, infrastructure and earthwork's (Resubmission of 19/P/00634) (Includes 5 self-build plots)
19/P/02153	11/3/2020	The White House, Forest Road, East Horsley	Erection of self-build two storey detached dwelling with an integral garage and accommodation in the roof space, following demolition of existing dwelling and outbuildings.

²² Additional local eligibility criteria introduced 1/11/18.

Traveller Accommodation

- 3.42. The Traveller Accommodation Assessment ('TAA') (2017)²³ sets out the expected need for traveller pitches and travelling showpeople plots over the Local Plan period. Policy S2 of the Local Plan: Strategy and Sites, adopted in April 2019, reflects the identified need in the TAA (2017) and makes provision within the borough for 4 Gypsy and Traveller pitches and 4 Travelling Showpeople plots to meet the accommodation needs for travellers (as defined by Planning Policy for Traveller Sites (PPTS) August 2015) between 2017 and 2034.
- 3.43. Though the Council does not need to set targets to meet the needs of Gypsies, Travellers and Travelling Showpeople who do not meet the planning definition, the Council recognise from the findings of the TAA (2017) that there is an additional need for 41 permanent pitches for Gypsies and Travellers and 4 permanent plots for Travelling Showpeople who do not meet the planning definition of traveller. There is also a likely need for 8 permanent pitches to meet potential additional need of households of unknown planning status. These identified needs are reflected in Policy S2.
- 3.44. Tables 16 and 17 (below) show the planning approvals and pending applications respectively.

Table 16: Permissions for traveller pitches and plots (1 April 2019 to 31 March 2020)

App. Reference	Date Approved	Address	Number of Pitches/Plots
18/P/01484	9/4/19	Roundoak, White Hart Lane, Wood Street Village	1
17/P/00092	3/7/19	The New Yard, Lysons Ave, Ash Vale	1
19/P/01136	8/11/19	Four Acres Stables, Aldershot Road, Guildford	6
19/P/01504	21/02/20	Valley Park Equestrian Centre, East Shalford Lane, Guildford	5
18/P/02435	24/02/20	Oaklands Farm (formerly Palm House Nurseries), Glaziers Lane, Guildford	6

Table 17: Pending planning applications for traveller pitches and plots during monitoring period (1 April 2019 to 31 March 2020)

App. Reference	Date	Address	Number of Pitches/Plots
Pending	20/P/00232	The Paddocks, Land off Rose Lane, Ripley	4

- 3.45. The Land Availability Assessment ('LAA') (2020)²⁴ includes an assessment of land available for traveller accommodation. The LAA identifies sufficient potential land to meet the need for traveller accommodation over the plan period (2015 – 2034). Further details on traveller accommodation can be viewed in the LAA 2020.

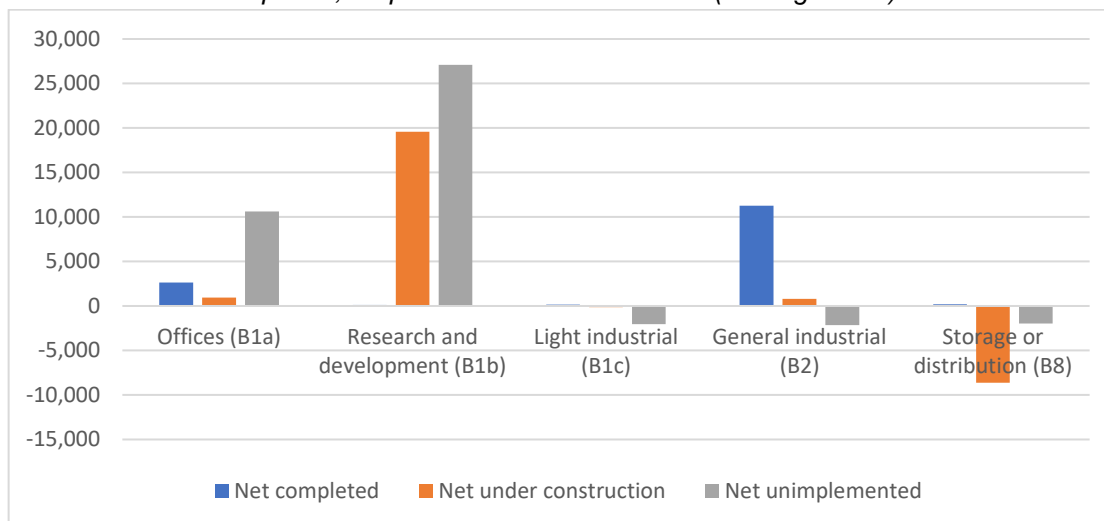
²³ Available online at: <https://www.guildford.gov.uk/localplan/housing>.

²⁴ Available online at: <https://www.guildford.gov.uk/localplan/housing>.

Employment and Retail

Employment Floorspace

Figure 1: Net* sqm change in employment (Class B) floorspace unimplemented²⁵, under construction and completed, 1 April 2019 to 31 March 2020 (Borough-wide)



Use class	Net completed (sqm)	Net under construction (sqm)	Net unimplemented
Offices (B1a)	2,636	959	10,627
Research and development (B1b)	112	19,570	27,084
Light industrial (B1c)	156	-139	-2,025
General industrial (B2)	11,282	791	-2,139
Storage or distribution (B8)	197	8,638	-1,982
Total	14,383	12,543	31,656

* Please note these figures are overall net sums for each use class. Within each total, there are gains and losses of floor space from individual sites

- 3.46. Figure 1 above shows the permitted gains and losses of employment (Use Classes B1, B2 and B8) floorspace in square metres (sqm) by use class across the Borough during the monitoring period (1 April 2019 to 31 March 2020), from new developments and changes of use. The 'Net completed' column of the table indicates the total net change in floorspace for schemes completed during this period. The 'Net under construction' and 'Net unimplemented' columns indicate the total proposed net change in floorspace from developments that had not been completed as of 31st March 2020, where the proposed development was either under construction (had commenced) or had not been started (was unimplemented) as of this date. The figures are overall sums of net gains and losses from all planning applications, therefore within the total for each use class there are gains and losses (proposed or actual) from individual sites.

²⁵ Unimplemented floorspace refers to developments that had been granted planning permission but where the proposed development had not yet commenced at the end of the annual monitoring period.

Employment floorspace completed

- 3.47. The largest net gain of employment floorspace completed during the 2019/20 monitoring period was in the office (class B1a) floorspace category, which amounted to an overall 2,636 sqm. This was from two permitted schemes. The first of these comprised 1,416 sqm office space as part of construction of larger industrial units at Henley Business Park, Pirbright Road, Normandy (which made up the 11,282 sqm class B2 general industrial floorspace also completed during this period). The second scheme involved subdivision of four previously approved office units to create eight units (total additional floorspace of 1,220 sqm) for start-up businesses on land to the north of Weyvern Park, Old Portsmouth Road. There was also a small net gain of research and development (class B1b), light industrial (B1c) and storage or distribution (B8) floorspace, arising from the above-mentioned expansion of Henley Business Park.

Employment floorspace under construction

- 3.48. There was a total net gain of around 12,500 sqm of use class B1 (a, b and c), B2 and B8 employment floorspace under construction ('Net under construction' column) at the end of the 2019-2020 monitoring period. Within the subtotals for each of these types of employment use, the biggest change and net gain was for class light industrial (B1b) floorspace. Two new medical research and development buildings at Surrey Research Park comprising over 7,600 sq. m and two new laboratory buildings comprising more than 11,700 sq. m at Pirbright Laboratory Institute for Animal Health accounted for the bulk of the 19,570 sqm class B1b floorspace under construction at the end of the 2019/20 monitoring period.
- 3.49. Class B8 storage and distribution space made up the largest net loss of employment floorspace from schemes under construction during the 2019/2020 monitoring period, comprising around 8,600 sqm. This was arising primarily from a scheme to redevelop four large storage sheds at Tithebarns Farm, Tithebarns Lane, Send (comprising nearly 6,000 sqm), to create 13 homes.
- 3.50. The office (B1a) floorspace under construction included a new office at Unit 5, Guildford Business Park, and car parking deck on a nearby plot²⁶. It also included just over 2,500 sqm at Pembroke House, Mary Road, Guildford, from redevelopment of an existing warehouse and offices.

Unimplemented schemes involving loss or gain of employment floorspace

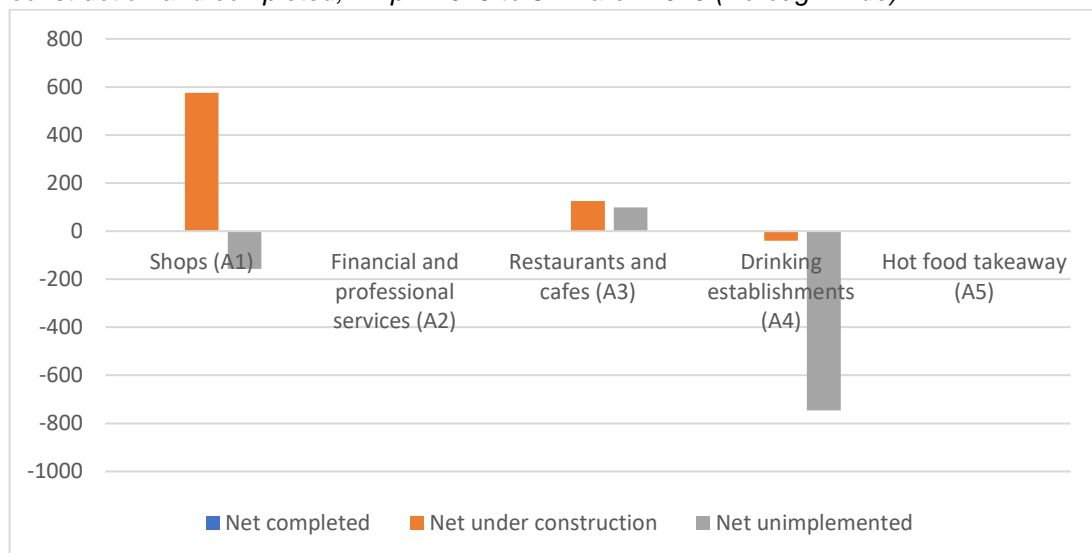
- 3.51. Approved developments that remained unimplemented at the end of the monitoring period proposed an overall net gain of 31,565 sqm total B class employment floorspace across the borough. Within this total, a net gain of just over 27,000 sqm research and development (B1b) floorspace and 10,600 office (B1a) floorspace was proposed.

²⁶ The floorspace that this planning application relates to (application ref. 12/P/01894) was for a new 2,664 sq m office building and car parking deck. Work on the car parking deck had commenced prior to the original planning application's expiry date of May 2016.

- 3.52. More than 24,000 sqm of R&D (class B1b) floorspace remained unimplemented as part of an approved outline planning application approved in 2016 for partial demolition and redevelopment of the existing buildings at the Pirbright Laboratory Institute for Animal Health. This scheme would create up to 40,000 sqm of additional B1b research and development floorspace on the site and is due to take place in several stages, with approval of reserved matters for the first phase due to be submitted by July 2021.
- 3.53. The increase in B1a office floorspace was proposed to arise primarily from two applications at Guildford Business Park – one for an additional 5,684 sqm on plot no. 5 (Unit 5)²⁷ and the other for an additional 5,537 sqm net floorspace from the proposed redevelopment of Unit 428. There were also applications for several smaller schemes that remained unimplemented at the end of the 2019-2020 monitoring period that would result in the gain or loss of office space. Out of these, the B1a losses approved were mainly to residential dwellings, and included a number of applications for prior approval²⁹, as well as planning applications.
- 3.54. Some overall net losses in the region of around 2,000 sqm remained unimplemented within each of the B1c, B2 and B8 employment floorspace categories, from several applications for smaller schemes of various types determined within the previous few years, including the approved (in November 2016) change of use of an agricultural barn to a gym at Valentines Farm, Rose Lane, Ripley.

Retail floorspace

Figure 2: Net* sqm retail (Class A) floorspace granted planning permission, under construction and completed, 1 April 2019 to 31 March 2020 (Borough-wide)



²⁷ See application ref. 17/P/00243. This floorspace represents an increase of more than double that of the original scheme for Unit 5 proposed under application 12/P/01894.

²⁸ See application ref. 17/P/02280.

²⁹ Applications for prior notification for proposed changes of use, where the proposed use was permitted under the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended)

Use class	Net completed (sqm)	Net under construction (sqm)	Net unimplemented (sqm)
Shops (A1)	0	576	-157
Financial and Professional Services (A2)	0	0	0
Restaurants and Cafes (A3)	0	125	99
Drinking Establishments (A4)	0	-40	-746
Hot Food Takeaway (A5)	0	0	0
Total	0	661	-804

**Please note these figures are the overall net sums of gains and losses for each use class. Within each total, there are gains and losses of floor space from individual sites.*

Retail floorspace completed

- 3.55. Only a small number of schemes were recorded as having been completed during the 2019/20 monitoring period and none that entailed change of use of Class A retail floorspace.

Retail floorspace under construction

- 3.56. A total of 576 sqm class A1 shop floorspace was under construction at the end of the 2019/20 monitoring period which included a 200 sqm sales area for a new car showroom at Old Portsmouth Road, Peasmarsh, and conversion of an agricultural building to a farm shop (use class A1) and café (use class A3) at Mellersh Farm, New Pond Road, Compton.

Unimplemented schemes involving loss or gain of retail floorspace

- 3.57. Sites with planning permission that remained unimplemented at the end of the monitoring period were proposed to result in a total loss of just over 800 sqm Class A retail floorspace. The biggest change and net loss were within the category of class A4 drinking establishments, from within which a total 750 sqm approx. use class A4 floorspace was proposed to be lost. This included two public houses proposed for change of use to residential dwellings – The Duke of Normandy, Normandy, and The William Bray, Shere.

- 3.58. A small net overall loss of 157 sqm³⁰ of class A1 shop floorspace remained unimplemented, arising from a handful of small schemes. This included the proposed redevelopment of The Founders Studio Guildford School of Acting in Millbrook to a new building incorporating class A1 shop, A2 financial and professional services and B1a office uses on the ground floor, with six class C3 residential flats at first floor level. This application was determined in March 2018, but construction had not begun as of 31st March 2020.
- 3.59. There was also a net gain of just under 100 sqm of A3 floorspace unimplemented from the proposed change of use of Portman Motorcycles showroom at 23-25 Woodbridge Hill, Guildford to a restaurant and café.

Retail floorspace surveys

- 3.60. The Council undertakes surveys on foot of the use classes and vacancies for ground floor retail units in the Town Centre Primary Shopping Area (PSA) and the Borough's district and local shopping centres on an annual basis and for consistency of results these surveys normally take place around May each year. The latest surveys were undertaken in May 2019 and reported on in the 2018/19 Annual monitoring Report³¹, alongside analysis and comparison with survey data for previous years from 2015 onwards.
- 3.61. Due to the impact of the Covid-19 coronavirus pandemic and the necessity for the Council to take account of Government advice regarding working safely during this period³², it was decided not to undertake any retail surveys in May 2020 due to the heightened risk of infection to Council staff or anyone else who they may come into contact with while doing so. The Council intends to undertake surveys when it considers it reasonably safe to do so.
- 3.62. For this AMR, the results of quarterly surveys in the town centre undertaken by Experience Guildford, Guildford's Business Improvement District (BID), have been published instead, in the table below. The data from these surveys is also published by Springboard, which collate survey results from local authority districts and regions around the country. The national and regional average vacancy rates have also been included to indicate how Guildford town centre is performing overall as a whole compared to other areas.

³⁰ This compares to an overall proposed loss of -1,898 sq m of use class A1-A5 floorspace as of 31 March 2019 (see Monitoring Report 2017/2018, available at: [http://www.guildford.gov.uk/media/19972/Monitoring-Report/pdf/Monitoring_Report_2014_2015_\(3\).pdf](http://www.guildford.gov.uk/media/19972/Monitoring-Report/pdf/Monitoring_Report_2014_2015_(3).pdf)).

³¹ Available at: https://www.guildford.gov.uk/media/31295/Annual-Monitoring-Report-2018-2019/pdf/Annual_Monitoring_Report_2018-19.pdf?m=637124385667130000.

³² Available at: <https://www.gov.uk/guidance/working-safely-during-coronavirus-covid-19>.

- 3.63. The vacancy rate for Guildford town centre in October 2020 according to these surveys was 14.8%. This was higher than in July 2020, which in turn was an increase on the vacancy rate recorded for January 2020. The rates for the UK in the same month (11.3%) and South East (11.2%) have also followed an upward trajectory since January 2020 but not risen by as much as in Guildford, which saw a 4.8% increase between January and July. This took the vacancy rate for Guildford above both the national and regional average.

Figure 3: Vacancy rate (%) for ground floor town centre retail units, July 2019 – October 2020

Area	October 2020	July 2020	January 2020	July 2019
Guildford	14.8 (14.7*)	12.4	7.6	7.6
South East	11.2	10.7	9.7	9.2
UK	11.3	10.8	9.8	10.10

Source: Experience Guildford and Springboard

* Adjusted % based on units within the PSA boundary

- 3.64. The BID retail surveys were carried out over a larger geographical area than covered by the Council's own retail surveys (which comprises only the PSA) and therefore it would be expected that there would be a slight difference in the vacancy rate compared to the rate for the PSA. 7 of the 65 units reported as being vacant by the BID in October 2020 were located outside of the PSA boundary. Taking the number of units reported as vacant in the BID survey that fell within the PSA, the vacancy rate was 14.7%, which is marginally (0.1%) below the BID's recorded vacancy rate for its own town centre survey area.
- 3.65. The majority of the vacant units fell within the High Street, Upper High Street, North Street, Friary Centre, Tunsgate and Tunsgate Quarter. However, there were also a number in side streets between the main shopping streets. Only 1 out of 16 units in Friary Street was vacant (the former New Look at no. 14-16) and 1 out of 20 units in White Lion Walk was vacant (Unit 6 – formerly Trotters).
- 3.66. The incidence of vacant units was widespread across the PSA rather than concentrated in any specific area(s), indicating that the whole of the main shopping area of the town centre has felt the effects of the Covid-19 pandemic lockdowns and restrictions on in-store shopping. They included units that were previously occupied by restaurants, coffee shops and food-to-go outlets as well as by comparison retailers. This is similar to the picture nationally, as many businesses that are reliant on customer visits to physical high street outlets have been forced to close for part of 2020 due to restrictions and/or risk averse behaviour from shoppers affecting their sales. It is anticipated that many stores that are temporarily vacant should be able to reopen and trade successfully or may be occupied by new tenants once the risk from the pandemic lessens and the Government's current social distancing restrictions are relaxed. The Council will continue to monitor vacancies and the extent to which there is a recovery in this regard.

4. Planning Contributions

Community Infrastructure Levy ('CIL')

- 4.1. The Community Infrastructure Levy (CIL) is a charge on new development that would be paid by landowners or developers when new developments are built. It can assist in delivering infrastructure to support development. CIL is not currently in place in Guildford and developer contributions toward infrastructure are primarily secured through s106 agreements.
- 4.2. With an adopted CIL, landowners and developers are required to pay the relevant amount of CIL when they build their new buildings or extensions. CIL is non-negotiable but there are certain exceptions, such as affordable housing and developments by charities and those used for charitable purposes. The amount to be paid is based on the net floor area of a new building or extension, and its use. It applies to most new buildings and extensions over 100 sq. m. (gross), and to new homes regardless of their floor area.
- 4.3. The Council is undertaking further viability work during 2020-21 to support the emerging Local Plan: Development Management Policies. This work would also contribute to providing updated evidence to support the preparation of a draft charging schedule (DCS) for consultation. In the Planning for the Future White Paper (August 2020), the Government have proposed the introduction of a new consolidated 'Infrastructure Levy' to replace the existing parallel regimes for securing developer contributions. Progress in this regard will be monitored.
- 4.4. The CIL must be based on Local Plan development and infrastructure, and CIL rates are informed by viability evidence.
- 4.5. The Local Plan and CIL Viability Study (2016) and the Local Plan Viability Study Update (2017) were prepared as part of the evidence base for the Local Plan: Strategy and Sites. The former study included recommendations for CIL charging and rates. Further consultation on proposed rates (reflected in a draft charging schedule) would be necessary prior to submission for examination and introduction of CIL in Guildford.
- 4.6. Prior to these viability studies, the Council held a consultation between 19 January and 1 March 2015 on initial proposals for CIL rates in the borough, which were set out in a preliminary draft charging schedule. Whilst out of date, the preliminary draft charging schedule and supporting documents are available at <https://www.guildford.gov.uk/newlocalplan/cil>.

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- 4.7. Planning obligations assist in mitigating the impact of unacceptable development to make it acceptable in planning terms. Planning obligations may only constitute a reason for granting planning permission if they meet the tests that they are necessary to make the development acceptable in planning terms. They must be:
- necessary to make the development acceptable in planning terms;
 - directly related to the development; and
 - fairly and reasonably related in scale and kind to the development.
- 4.8. During the monitoring period, the Council agreed 134 Section 106 agreements and received £3,884,972.33. Additionally, £8,988,565.58 was negotiated during the monitoring period, and a total of £762,392.13 was spent.

Thames Basin Heaths Special Protection Area

- 4.9. Detailed analysis of the S106 contributions relating to the Thames Basin Heaths Special Protection Area (TBH SPA) are provided at Appendix 2: TBH SPA Position Statement. The appendix details developer contributions towards both Suitable Natural Alternative Greenspace (SANG) and Strategic Access Management and Monitoring (SAMM).

5. Duty to Cooperate

- 5.1. The duty to cooperate ('DtC') was introduced by the Localism Act 2011³³. It places a legal duty on local planning authorities, county councils in England and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of local plan preparation in the context of strategic cross boundary matters.
- 5.2. The Duty to Co-operate Matrix at Appendix 1 demonstrates the various organisations that the Council consults and corresponds with for the purposes of the duty-to-cooperate in plan-making, alongside the relevant strategic issues that they are consulted upon.
- 5.3. During the Monitoring Period, the Council adopted the Local Plan: Strategy and Sites (2015 – 2034) Development Plan Document. Following adoption of the plan, it was subject to three separate Judicial Reviews. All three claims were dismissed at the High Court. Following the dismissals, an appeal was lodged and was dismissed at the first stage.
- 5.4. During the monitoring period, the Council commenced work on part 2 of the Local Plan, the 'Local Plan: Development Management Policies' document. Shortly after the monitoring period began, the seven week Regulation 18 consultation was conducted, which sought feedback on the issues and preferred options. This included feedback from the prescribed bodies on the policy approach being pursued. More information will be reported regarding this in the next iteration of the Annual Monitoring Report.

6. Evidence Base

- 6.1. Paragraph 31 of the NPPF states that:

The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.

- 6.2. The Local Plan: Strategy and Sites (2015 – 2034) was adopted during this monitoring period and the evidence-base documents that support the plan remain up-to-date.
- 6.3. The full list of supporting evidence-base documents submitted to the Local Plan Examination in Public is available online at:
https://www.guildford.gov.uk/newlocalplan/media/26763/Submission-core-and-supporting-documents/pdf/Submission_core_and_supporting_documents.pdf.

³³ Available online at: <http://www.legislation.gov.uk/ukpga/2011/20/contents/enacted>.

Appendix 1 - Duty to cooperate matrix of prescribed bodies and strategic issues

	Housing	Gypsies and Travellers	Employment and retail	Transport	SPA / SANG	Green Belt	AONB	Infrastructure (incl. health & schools)	Flooding and waterways	Waste	Natural environment & open space
Surrey County Council	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Elmbridge Borough Council	✓	✓		✓	✓	✓		✓	✓		✓
Epsom and Ewell Borough Council		✓									
Mole Valley District Council		✓				✓	✓	✓	✓		✓
Reigate and Banstead Borough Council		✓					✓				
Runnymede Borough Council	✓	✓			✓						
Spelthorne Borough Council		✓									
Surrey Heath Borough Council	✓	✓			✓	✓		✓			✓
Tandridge District Council		✓					✓				
Waverley Borough Council	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
Woking Borough Council	✓	✓	✓	✓	✓	✓		✓	✓		✓
Hampshire County Council				✓	✓			✓	✓	✓	
Hart District Council					✓						
Rushmoor Borough Council	✓	✓	✓	✓	✓			✓	✓		✓

Prescribed Bodies											
Civil Aviation Authority				✓							
Clinical Commissioning Groups (CCG)											
Guildford and Waverley CCG								✓			
North West Surrey CCG											
Surrey Heath CCG											
Environment Agency									✓	✓	✓
Enterprise M3 LEP	✓		✓	✓				✓			
Highways England				✓							
Historic England	✓		✓								
Homes and Communities Agency (HCA)	✓	✓									
Mayor of London	✓	✓	✓			✓					
National Health Service Commissioning Board								✓			
Natural England					✓		✓				✓
Office of Rail and Road				✓							
Surrey Nature Partnership											✓
Transport for London				✓							

Appendix 2 – TBH SPA Position Statement 2020

Introduction

The Thames Basin Heaths Special Protection Area ('TBH SPA') Avoidance Strategy 2017 Supplementary Planning Document ('the SPA strategy') was adopted on 18 July 2017 and took effect on 28 July 2017³⁴. The strategy enables residential development to take place that would otherwise be prevented by the provisions of European and national legislation relating to the protection of the Special Protection Area ('SPA').

Implementation and Monitoring

Officers from Planning, Parks and Countryside and Financial Services meet periodically to assess the progress and to identify and address implementation issues as they arise.

We report on an annual basis to the Joint Strategic Partnership Board ('JSPB') on:

- Suitable Alternative Natural Greenspace ('SANG')³⁵ delivery and capacity within the borough,
- Housing provision in the 400 metre exclusion zone and zone of influence³⁶,
- Our programme for future provision of SANG,
- Monitoring data relating to Strategic Access Management and Monitoring ('SAMM')³⁷ finances quarterly.

The responsibility for monitoring the effectiveness of the SANG and SAMM approach falls to the JSPB. The JSPB has also taken on the role of organising and funding visitor surveys on fully allocated SANGs across the TBH area in order to provide a standardised consistent approach to monitoring. The evidence collected has shown that there has been no significant increase in the levels of visitors on the SPA despite an increase in the number of homes within the vicinity of the SPA³⁸. Evidence continues to be collected through the SAMM project and further reports will be released in due course.

Financial Situation

The financial position with regard to each of the designated and operational SANG sites at the end of March 2020 is shown in the following table.

³⁴ Available online at: <https://www.guildford.gov.uk/tbhspa>.

³⁵ See the SPA strategy page 15 for an explanation of SANGs

³⁶ See the SPA strategy page 10 for an explanation of the exclusion zone and zone of influence.

³⁷ See the SPA strategy page 27 for details of the SAMM project.

³⁸ See Natural England Commissioned Report NECR136
<http://publications.naturalengland.org.uk/publication/4514481614880768>.

SANG Site	Contributions received from September 2006 to end of March 2020	Expenditure incurred from September 2006 to end of March 2020
Chantry wood	£4,592,092	£284,808
Effingham Common	£2,092,953	£93,664
Lakeside Nature Reserve	£765,399	£217,899
Riverside Nature Reserve and Parsonage Watermeadows	£3,469,349	£680,313
Sub Totals	£10,919,793	£1,276,684

The table above does not include financial information for SANGs outside of Council ownership as the Council does not receive money or spend money on works for these SANGs. The Council does, however, monitor capacity in SANGs outside of Council ownership (see next section).

Current SANG capacity

We closely monitor the amount of SANG allocated to housing developments as they occur to ensure that sufficient SANG capacity is available. Since the previous monitoring report, Ash Green Meadows SANG has been extended through the addition of land at Bin Wood which provides 2.17 additional hectares. The table below sets out the position at the end of December 2020.

SANG Site	Total amount of SANG (hectares)	SANG already allocated (hectares)	Remaining SANG (hectares)
Riverside Nature Reserve and Parsonage Watermeadows	24	23.3	0.7
Effingham Common	34	14.5	19.5
Lakeside Nature Reserve	4	3.8	0.2
Chantry Wood	38	31.2	6.8
Ash Green Meadows (inc. Bin Wood)*	26.2	22.1	4
Runfold Bridge (Manor Farm)*	17.7	5.6	12
Remaining overall			43.2

*These are SANGs outside Council ownership.

Figures may not sum due to rounding.

Where developers have obtained planning permission and have been allocated SANG but have not yet paid the fees required to secure the SANG capacity, it is possible that the development will not be built out and the planning permission will expire. In these circumstances the SANG allocation will be withdrawn and the capacity will be made available for other developments.

The Local Plan: Strategy and Sites 2015 – 2034 includes a housing requirement of 562 homes per year (2015 – 2034). On the basis of this number, the existing unallocated SANG capacity of 43.2 hectares, which equates to around 2,246 new homes (assuming an average occupancy of 2.4 people per house and a provision of 8 hectares of SANG per thousand people which equates to 0.0192 hectares of SANG per house), is expected to last 4 years (2,246 new homes, divided by 562 homes per year = 4 years).

Emerging SANGs and additional capacity

There are a number of new SANGs expected to come online in the near future.

Tyting Farm, to the southeast of Guildford, will be a Council owned SANG and was expected to come online early in 2020. Works were delayed due to Covid and it is now expected to open in late 2021. It will provide around 40 additional hectares of SANG capacity as an extension to the existing SANG at Chantry Wood. The SANG will provide mitigation for developments in and around the Guildford urban area.

Horsley Meadows SANG (formerly referred to as Long Reach SANG) is a new 24 hectare SANG in West Horsley. It has been granted planning permission and work is underway to bring the SANG online. The SANG is privately owned and has capacity for approximately 1,250 homes with a catchment covering the east of the borough.

Wood Street Knoll SANG (formally referred to as Russell Place Farm SANG) is a new 34 hectare SANG in Worplesdon parish near Wood Street Village. It has been granted planning permission and works to bring it online are underway. The SANG is privately owned and has capacity for approximately 1,770 homes, with a catchment stretching from Guildford to Ash.

These three SANGs together would provide around 98 hectares of SANG, enough land for just over 5,000 homes and nine years of housing supply.

Eashing Fields SANG near Eashing is within Guildford borough and has been brought forward by the developer of a housing site over the borough boundary in Waverley. The SANG is not yet online and it is not clear whether this SANG will have capacity that could be available for developments in Guildford borough.

Burpham Court Farm is a Council owned site to the northeast of Guildford. The Council has submitted a change of use planning application create new open space and a Nature Reserve covering 45.9 hectares. It is not clear at this stage how much of that land would be available for use as SANG.

The Local Plan: Strategy and Sites contain allocations for large strategic sites at Gosden Hill Farm, Blackwell Farm and the Former Wisley Airfield. These strategic site allocations will deliver bespoke SANGs to provide mitigation for their own developments.

The Council continues to work to ensure enough SANG is in place:

- We are looking at options for a parking area for Effingham Common SANG. A parking area, which may need a Section 38 Agreement for the use of common land and planning permission, will significantly increase the development capacity of this SANG by widening its sphere of influence from 400 metres to 5 kilometres.
- The Council is working with the owners of privately owned SANGs that are not yet online to agree a mechanism that enables their SANGs to come online for new developments.
- We continue to engage with landowners who are considering offering their land for use as SANG, including developers proposing new SANGs.

Strategic Access Management and Monitoring (SAMM)

Hampshire County Council is the body that holds the funds provided by developers for SAMM. This money is used by JSPB to fund monitoring and access management on the SPA. Since 2011, and up to the end of March 2020 we have passed £1,993,028 to Hampshire County Council (who host the SAMM project) for this purpose