



GUILDFORD  
B O R O U G H

# Authority Monitoring Report

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## Guildford Borough Council

1 April 2020 – 31 March 2021

**Published August 2021**

Please note: for clarity, an update to the AMR was made in October 2021 following its publication in August to reflect further detail on student and total housing completion figures for 2020/21 (incorporating student completions) at para 3.8 and 3.9. This supplementary information is reflected in tracked changes.

Subsequently, a further update to the AMR was made in January 2022 to reflect the accurate figures for the affordable homes completed for 2020/21 at table 6. This corrected information is reflected in tracked changes.

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## Executive Summary

The Authority 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')<sup>1</sup>.

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 Authority Monitoring Report (2020 – 2021) covers the Monitoring Period between 1 April 2020 to 31 March 2021.

The Local Plan: Strategy and Sites (2015 - 2034) was adopted on 25<sup>th</sup> 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 Some Development Management policies from the Local Plan (2003) were not superseded and remain in effect.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 Council undertook data migration to a new monitoring database during the last monitoring period. The new database supports the collection and analysis of data required to assess performance against the Monitoring Indicators introduced in the Local Plan: Strategy and Sites (2015 – 2034). 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.

### Further information

For further information please:

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

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

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# 1. Introduction

## What is an Authority Monitoring Report?

- 1.1. The Authority Monitoring Report (2020/21) ('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. This is the first year in which Guildford Borough Council has published this document as the 'Authority Monitoring Report'. In previous years, it has been published as the 'Annual Monitoring Report'.
- 1.3. 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. AMRs 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 Authority Monitoring Report?

- 1.4. 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 progressing<sup>2</sup>.*
- 1.5. 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 SANG 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.

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<sup>2</sup> PPG Paragraph 027; Reference ID: 12-027-20170728.

- 1.6. This AMR reports on the financial year from 1<sup>st</sup> April 2020 to 31<sup>st</sup> March 2021 (the monitoring period).
- 1.7. The Council adopted the Local Plan: Strategy and Sites (2015 – 2034) ('LPSS') on 25 April 2019. This is during the last Monitoring Period, which was covered in the last 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 Authority Monitoring Report be used?**

- 1.8. Alongside other evidence-base documents, the AMR comprises one of the suite of documents that supports the Council's development plan.
- 1.9. National Planning Practice Guidance ('PPG') provides a short commentary on the role of the Monitoring Report<sup>3</sup>. 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 Councils determine whether there is a need to undertake a partial or full review of their Local Plan.

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<sup>3</sup> 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”<sup>4</sup>.
- 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)<sup>5</sup>. 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 Authority Monitoring Reports where the authority is not implementing a policy specified in a local plan and provide justification for this<sup>6</sup>. 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 26<sup>th</sup> May 2020, which is within this monitoring period.
- 2.6. The Council plans to adopt a new LDS in autumn 2021, which is beyond the scope of this monitoring period.
- 2.7. 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

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<sup>4</sup> NPPF Paragraph 2.

<sup>5</sup> NPPF Paragraph 213.

<sup>6</sup> See Regulation 34 of the Town and Country Planning Regulations (2012).

consultation was slightly delayed due to the outbreak of COVID-19 and the need to update its Statement of Community Involvement.

- 2.8. 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 is intended to occur in autumn 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 the revised timescale.

### **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 25<sup>th</sup> 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 2020<sup>7</sup>. 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 an expanded set of the adopted policies in the Local Plan: Strategy and Sites (2015 – 2034) in subsequent reports as the data becomes available.

### **Neighbourhood Development Plans and Orders**

- 2.13. Neighbourhood planning was introduced through the Localism Act (2011). New powers were introduced that allowed qualifying bodies<sup>8</sup> to produce neighbourhood plans and

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<sup>7</sup> See Regulation 18 of the Town and Country Planning Regulations (2012). Available online at: [www.legislation.gov.uk/ukSI/2012/767/regulation/18/made](http://www.legislation.gov.uk/ukSI/2012/767/regulation/18/made).

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



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)<sup>9</sup>.
- 2.16. During the monitoring period, the Council has not adopted any further Neighbourhood Plans. On the 6<sup>th</sup> May 2021, local elections took place. Eligible residents were able to vote on neighbourhood plan referendums. At this election, referendums took place for Lovelace, Puttenham, and Send Neighbourhood Plans. All three passed referendum and were officially adopted on 19<sup>th</sup> May 2021. This is, however, outside of the monitoring period covered in this Authority Monitoring Report.
- 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 has recently undertaken a Regulation 16 consultation, which ran from 12<sup>th</sup> May 2021 to 12<sup>th</sup> July 2021. However, this consultation took place beyond the scope of the monitoring period covered in this Authority Monitoring Report. The Council has been 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 two Supplementary Planning Documents ('SPD') during the monitoring period. The Strategic Development Framework SPD (2020) was formally adopted on 21<sup>st</sup> July 2020, and the Climate Change, Sustainable Design, Construction and Energy SPD (2020) was formally adopted on 22<sup>nd</sup> September 2020. Both were adopted via Executive Council decision. These documents are available to view online at: <https://www.guildford.gov.uk/localplan/spd>.
- 2.19. A new Parking SPD is to be drafted with the intention of consulting on this document in parallel with the Regulation 19 Local Plan Development Management Policy consultation planned for autumn/winter 2021/22.

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<sup>9</sup> 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 Authority Monitoring Reports outline progress against targets for the monitoring period (2020 – 2021). The 'LPSS' confirms that the Council's Objectively Assessed Need ('OAN') is 562 dwellings over the plan period (2015-2034).

Table 1: Previous Housing Completions<sup>10</sup>

Monitoring Period	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	Total
Completions	387	294	299	351	352	609	2,292

*\*This table is for the completion of C3 dwellings. It does not include any contribution from student accommodation that can be counted as part of the housing supply<sup>11</sup>. See section below for total completions figures incorporating student completions.*

##### Housing for Students

- 3.4. 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.
- 3.5. 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 479 bedspaces in PBSA at Manor Park were completed by September 2018 and another 669 completed by September 2019. On 20/05/2020 it was determined that prior approval was not required under Schedule 2, Part 11, Class B of the Town and Country Planning (General Permitted Development)

<sup>10</sup> Housing completions data for monitoring periods preceding 2016/2017 is available in previous monitoring reports, available at: <https://www.guildford.gov.uk/localplan/monitoring>.

<sup>11</sup> National Planning Practice Guidance, Paragraph: 034 Reference ID: 68-034-20190722

Order 2015 (as amended) for the demolition of four two-storey student halls of residence with 224 bedspaces on the University Stag Hill campus.

- 3.6. Last year the following permissions for private student accommodation were not recorded in the AMR for the period 1 April 2019 to 31 March 2020: 18/P/02226 Bishops Nissan, Walnut Tree Close for 361 bedspaces approved on 26/9/19, 18/P/02391 1& 2 Ash Grove for 79 bedspaces approved on 21/02/20 and 19/P/00535 Land at Guildford College, Stoke Road for 533 bedspaces (previously approved 527 bedspaces ref: 17/P/00509) approved on 15/7/19.
- 3.7. Table 2a (below) shows the planning permissions that have been granted during this monitoring period for purpose-built student accommodation. Further details can be viewed in Appendix 5 of the Land Availability Assessment (2019)<sup>12</sup>.

*Table 2a: Planning permissions for purpose-built student accommodation 1 April 2020 to 31 March 2021*

Application Reference	Date Approved	Address	Proposal
20/P/01460	12/02/21	Just Tyres, Walnut Tree Close	Revision to approved application 18/P/02100 for 17 additional studio rooms

- 3.8. To calculate the equivalent number of C3 bedspaces we use the ratio of 1:1 for studio flats and 3.1:1 for cluster flats. The ratios used are different for the Housing Flows Reconciliation completions. The table below shows the student bedspace completions for this monitoring period, and the equivalent number of C3 bedspaces.

Table 2b: Completions of purpose-built student accommodation 1 April 2020 to 31 March 2021

Planning reference	Site	Bedspaces	Equivalent C3 units
18/P/01155 and 19/P/00267	Kernal Court (Scape 2), Walnut Tree Close, Guildford, GU1 4UD	403 (254 studio flats and 149 cluster flats)	302 <sup>13</sup>
	<b>Total</b>	<b>1475</b>	

#### Total housing completions

- 3.9. The total housing completions figure for 2020/21 is 911 homes. This includes 609 C3 dwellings (see Table 1 above), along with 302 equivalent C3 units (see Table 2b above).

#### Planning Permissions Granted for New Homes

- 3.10. 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/02197: Land South of Guildford Road, and to the South and East of Dene Close. This application is approved for 154 net homes. This is a slightly bigger

<sup>12</sup> Available to view online at: <https://www.guildford.gov.uk/localplan/housing>.

<sup>13</sup> Calculation: 149 cluster flats/3.1 ratio = 48, plus 254 studio flats = 302 C3 bedspaces

approval than the largest planning permission approval in the previous monitoring period (19/P/01541), which was for 108 net homes. This year, the approvals comprise mostly smaller planning permissions, which follows a similar trend to the previous monitoring period

*Table 3: New Homes Granted Permission in Guildford Borough Each Year<sup>14</sup>*

Monitoring Period	Number of new market homes granted permission (net)	Number of affordable homes granted permission (net)
2016 / 2017	577	174
2017 / 2018	1062	233
2018 / 2019	609	285
2019 / 2020	553	165
2020 / 2021	324	73

*\*This table reflects permission granted for C3 units, and does not include student accommodation that can count towards housing supply.*

- 3.11. Table 4 (below) shows the proportion of new homes approved by site size. During the monitoring period, the largest percentage came from site sized 51-200 dwellings, which made up 42% of the applications approved during the period.

*Table 4: Proportion of new homes approved by site size*

Site size (Net number of homes)	Proportion of new homes approved per year						
	2014 / 2015	2015 / 2016	2016 / 2017	2017 / 2018	2018 / 2019	2019 / 2020	2020 / 2021
Less than 5	16%	34%	83%	12%	11%	9%	27%
6 – 15	18%	26%	11%	11%	12%	7%	4%
16 – 50	8%	40%	3%	6%	-	15%	27%
51 – 200	8%	-	3%	-	23%	69%	42%
200+	-	50%	-	-	54%	-	-

*\*This table reflects permission granted for C3 units, and does not include student accommodation that can count towards housing supply.*

### Outstanding Capacity

- 3.12. 'Outstanding capacity' refers to the number of new homes on sites with planning permission that have not yet been built. This monitoring year, the publication of the Authority Monitoring Report will precede the publication of the Land Availability Assessment (2021) ('LAA'). Information regarding outstanding capacity will be covered within the 'LAA'. This can be viewed at <https://www.guildford.gov.uk/article/25375/Land-Availability-Assessment>

<sup>14</sup> These figures include permissions that have since expired.

### Five-Year Housing Land Supply

- 3.13. As at 1 April 2020, the Council has a Five-Year Housing Land Supply position of 7.34 years, as confirmed in the Land Availability Assessment (2020).
- 3.14. An updated figure for the Five-Year Housing Land Supply position will be published in the Land Availability Assessment, which is due to be published in autumn 2021.
- 3.15. Detailed assessment of the Council's Five-Year Housing Land Supply is set out in the Five-Year Housing Land Supply document (5YHLS)<sup>15</sup>.
- 3.16. 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.
- 3.17. Table 5 (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.

*Table 5: Five-Year Housing Land Supply Calculation*

<b>A</b>	Housing requirement (2015 - 2034)		10,678
<b>B</b>	Annual requirement	A / 19 =	562
<b>C</b>	Completions required (1 April 2015 - 31 March 2020)	B * 4 =	2,810
<b>D</b>	Completions delivered (1 April 2015 - 31 March 2019)		1,683
<b>E</b>	Accrued deficit (1 April 2015 - 31 March 2020)	C - D =	1,127
<b>F</b>	Deficit annualised over the remaining plan period (Liverpool approach)	E / 15 =	81
<b>G</b>	Annual housing requirement taking account of deficit	B + F =	643
<b>H</b>	Housing requirement (1 April 2020 - 31 March 2025)	G * 5 =	3,213
<b>I</b>	Plus 5% buffer	H * 1.05 =	3,374
<b>J</b>	Housing supply (1 April 2020- 31 March 2025)		4,950
<b>K</b>	Five-year housing land supply	(J / I) *5 =	7.34

### Housing Delivery Test ('HDT')

- 3.18. Government published the Housing Delivery Test: 2020 measurement on 19 January 2021. This comprises the most recent HDT result. The 2020 HDT measurement for GBC is 90% of its housing requirement over the three previous years. The 2019 HDT measurement for GBC was 83% of its housing requirement over the previous three years whilst the 2018 HDT was 75%.
- 3.19. 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 years<sup>16</sup>.

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

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

### Housing Trajectory

- 3.20. The Five-Year Housing Land Supply document includes a Housing Trajectory illustrating the expected housing delivery over the next 15 years. This comprises sites that already have planning permission as well as potential development sites identified in the LAA that are expected to gain planning permission in the future.
- 3.21. The accompanying graph, extracted from that 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.

Housing Trajectory Graph



### Provision of Affordable Homes

- 3.22. 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 2<sup>17</sup>.
- 3.23. The West Surrey SHMA: Guildford Addendum (2017) identifies that there are 517 households per annum who require financial support to meet their housing needs<sup>18</sup>.

*Table 6: Affordable homes completed in Guildford borough*

Monitoring Period	Number of new affordable homes (gross)
2012 / 2013	22
2013 / 2014	17
2014 / 2015	68
2015 / 2016	125
2016 / 2017	32
2017 / 2018	111
2018 / 2019	89
2019 / 2020	62
2020 / 2021	<del>25</del> <u>78</u>

### Brownfield land development ratio

- 3.24. 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
911*	685	75%	226	25%

*\*This table reflects both C3 and student accommodation completions that count towards housing supply*

- 3.25. Table 7 illustrates that the majority of new homes delivered in the borough during this monitoring period has been on brownfield land. Application 19/P/00267: Kernal Court, Walnut Tree Close contributed significantly to the number of brownfield land completions, providing 113 C3 units, and 189 student units in total during the monitoring period. For greenfield land, application 17/P/02592: Land South of Ash

<sup>17</sup> 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](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf)

<sup>18</sup> 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](https://www.guildford.gov.uk/newlocalplan/media/23816/West-Surrey-SHMA-Guildford-Addendum-Report-2017/pdf/West_Surrey_SHMA_Guildford_Addendum_Report_2017.pdf)



Lodge Drive is still providing a high number of completions, totalling 207 during the monitoring period.

- 3.26. 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

- 3.27. 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.
- 3.28. Part 1 of the most recently published Brownfield Land Register was published on Friday 10 November 2020, containing 64 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 (2020 / 2021)

*Table 8: Type of homes granted planning permission (Gross) (2020 / 2021)*

Type of Home	Number of new homes (gross)	Percentage of new homes (gross)
House	264	67%
Flat	133	33%

- 3.29. 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%

- 3.30. 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 currently not being fully

achieved, though some of the categories are skewed toward either oversupply or undersupply.

*Table 9: Mix of housing sizes granted planning permission (2020 / 2021)*

Type of homes	Affordable Housing (%) (net)	Market Housing (%) (net)
One Bedroom	20%	16%
Two Bedroom	53%	22%
Three Bedroom	27%	31%
Four Bedroom+	-	31%

Affordable provision on qualifying sites

- 3.31. Policy H2 of the Guildford Local Plan Strategy and Sites seeks affordable housing provision on sites of 11 or more homes. The Council seeks 40% of the homes on site to be affordable.
- 3.32. During the monitoring period, 3 applications met the 11 dwelling threshold as set out in policy H2. Of the total 208 units provided by the qualifying sites, 73 of these units were affordable. This equates to a total of 35% affordable units, which is below the target of 40%.
- 3.33. Table 10 (below) demonstrates qualifying sites where applications were approved during this monitoring period, and the total percentage of affordable units which were agreed. Where the development has not met the 40% target, an explanation is provided as to why this was not achieved.

*Table 10: Percentage of affordable housing on qualifying sites (2020 / 2021)*

Application Reference	Address	Total Units	Total Affordable Units	Affordable Percentage	Justification
19/P/02197	Land south of Guildford Road, and to the south and east of Dene Close	154	54	35%	Outline permission was approved before the adoption of Guildford's Local Plan Strategy and Sites. Policy H2 did not apply. Local Plan 2003 required 35% affordable homes so this scheme was policy compliant with the previous policy.
20/P/01102	Land at Poyle Road	35	14	40%	-
19/P/01994	Safeguard Bus Depot and 7 Ridgemount	19	5	26%	A reduced contribution of 5 affordable dwellings was agreed through S106 agreement on the basis of viability issues

### The Loss of Homes

- 3.34. During the monitoring period, two planning permissions were granted which resulted in the net loss of dwellings. These applications were 20/P/00793: West Lodge, Chilworth and 20/P/00334: 10 Ashenden Road, Onslow. Combined, these applications resulted in the net loss of two 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

- 3.35. 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.
- 3.36. 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.
- 3.37. 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.
- 3.38. No planning applications for C2 housing for older people and people with disabilities were approved during the monitoring period. Last year we did not report that a replacement 59 bedroom care home was approved on 27/01/20, with a net increase of 20 bedspaces (The Old Hall, Send, planning reference 19/P/01559).
- 3.39. There is a pending planning application for a 60 bedroom care home at Ashley House, Christmas Hill, Shalford, Guildford (Reference: 20/P/01291).

#### Housing for Students

- 3.40. 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.
- 3.41. 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 479 bedspaces in PBSA at Manor Park were completed by September 2018 and another 669 completed by September 2019. On 20/05/2020 it was determined that prior approval was not required under Schedule 2, Part 11, Class B of the Town and Country Planning (General Permitted Development) Order 2015 (as amended) for the demolition of four two-storey student halls of resident with 224 bedspaces on the University Stag Hill campus.

- 3.42. Last year the following permissions for private student accommodation were not recorded in the AMR for the period 1 April 2019 to 31 March 2020: 18/P/02226 Bishops Nissan, Walnut Tree Close for 361 bedspaces approved on 26/9/19, 18/P/02391 1& 2 Ash Grove for 79 bedspaces approved on 21/02/20 and 19/P/00535 Land at Guildford College, Stoke Road for 533 bedspaces (previously approved 527 bedspaces ref: 17/P/00509) approved on 15/7/19.
- 3.43. Table 11 (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 (2020)<sup>19</sup>.

*Table 11: Planning permissions for purpose-built student accommodation 1 April 2020 to 31 March 2021*

Application Reference	Date Approved	Address	Proposal
20/P/01460	12/02/21	Just Tyres, Walnut Tree Close	Revision to approved application 18/P/02100 for 17 additional studio rooms

### **Self-build and Custom House Build**

- 3.44. 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](http://www.guildford.gov.uk/selfbuild)). Local authorities must have regard to the register when carrying out their Planning, Housing, Regeneration and Land Disposal functions.
- 3.45. Self-build and Custom Housebuilding Planning Practice Guidance<sup>20</sup> 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 housebuilding<sup>21</sup>.
- 3.46. 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

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

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

<sup>21</sup> PPG Paragraph 023; Reference ID 57-023-201760728.

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.

3.47. In addition to the statutory criteria listed above, there is also additional eligibility criteria<sup>22</sup> 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 12: 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
<b>TOTAL</b>	<b>18</b>

3.48. 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.

3.49. No planning applications for self-build or custom housebuild plots were approved during the monitoring period. There are two pending planning applications that includes some custom-build plots at land at Garlicks Arch, Send, planning reference 19/P/02223 and also a hybrid application including 7 self-build/custom build plots at Manor Farm, West Horsley reference 20/P/02067.

#### Traveller Accommodation

3.50. The Traveller Accommodation Assessment ('TAA') (2017)<sup>23</sup> 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.

<sup>22</sup> Additional local eligibility criteria introduced 1/11/18.

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

3.51. 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.

3.52. Table 13 (below) shows the planning approvals for the current reporting period.

*Table 13: Permissions for traveller pitches and plots (1 April 2020 to 31 March 2021)*

<b>App. Reference</b>	<b>Date Approved</b>	<b>Address</b>	<b>Number of Pitches/Plots</b>
20/P/00232	17/2/21	The Paddocks, Land off Rose Lane, Ripley	4 pitches

3.53. The Land Availability Assessment ('LAA') (2020)<sup>24</sup> 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.

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

## 4. Employment and Retail

### Employment Floorspace

Figure 1: Net\* sqm change in employment (Class E(g)) floorspace unimplemented<sup>25</sup>, under construction and completed, 1 April 2020 to 31 March 2021 (Borough-wide)

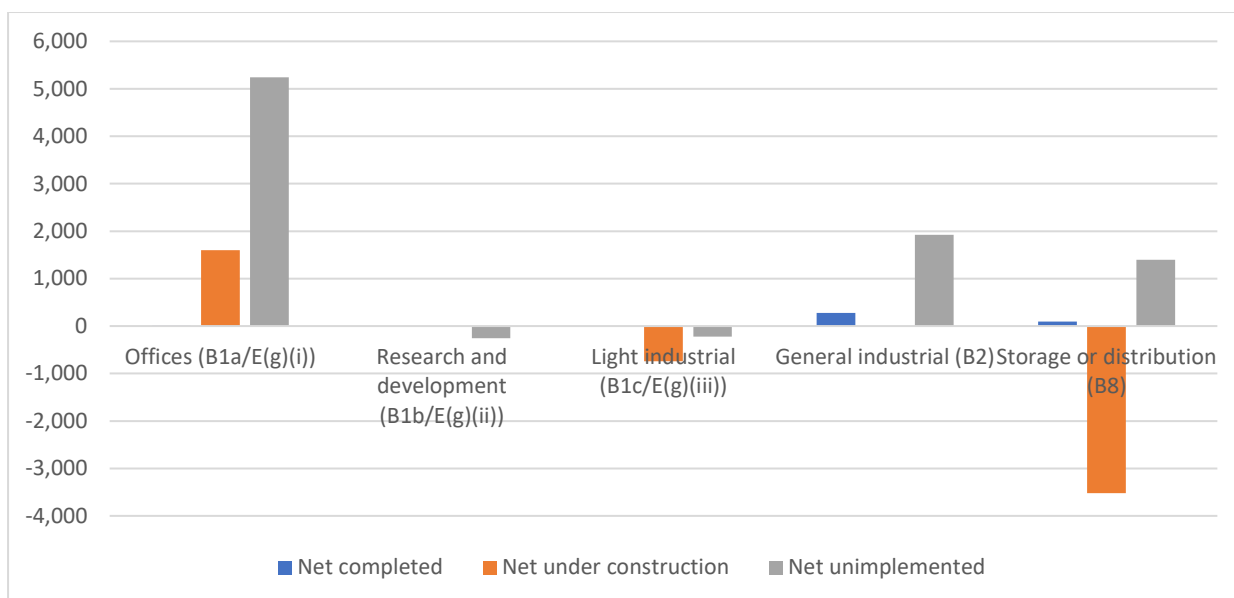


Table 14: Net completions and commencements for employment use classes (1 April 2020 to 31 March 2021)

Use class	Net completed (sqm)	Net under construction (sqm)	Net unimplemented
Offices (E(g)(i) /B1a)	10	1600	5,245
Research and development (E(g)(ii) /B1b)	0	0	-255
Light industrial (E(g)(iii) /B1c)	0	-739	-219
General industrial (B2)	279	-12	1,922
Storage or distribution (B8)	93	-3,520	1,400
Total	382	-2,671	6,748

\* 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

- 4.1. Table 14 (above) shows the permitted gains and losses of employment floorspace by use class across the Borough during the monitoring period (1 April 2020 to 31 March 2021).
- 4.2. Classes B1 (a, b and c) were revoked from 1 September 2020 and replaced by a new Use Class E – Commercial, Business and Service. For ease of reference the old use classes have been shown in the table above after the new ones as the date the

<sup>25</sup> 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.

applications were submitted will have affected how they were determined. For planning applications submitted from 1 September 2020, Class B1 uses are treated as Class E. For applications for prior approval, they were treated as Class B1 until the end of July 2021<sup>26</sup>.

- 4.3. 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 31<sup>st</sup> March 2021, 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.
- Employment floorspace completed

#### **Employment floorspace completed**

- 4.4. Employment floorspace completed during the 2019/20 monitoring period resulted in an overall net gain of 279 sqm in the general industrial (class B2) floorspace category. This arose from two schemes. The first was the change of use of the Truemans coach depot in Ash Vale to a mixed use (E(g)(i), B2 and B8) plant maintenance workshop. The second was demolition of a vacant industrial building at 11 Midleton Industrial Estate and construction of a new slightly larger industrial building on the existing site, subdivided into two units 11a and 11b. There was a small net gain of 93 sqm storage and distribution (B8) floorspace arising from three separate applications included the depot scheme mentioned above.
- Employment floorspace under construction

#### **Employment floorspace under construction**

- 4.5. There was a total net loss of around 2,670 sqm of use class B1(a)/E(g)(iii) light industrial, B2 and B8 employment floorspace under construction ('Net under construction' column) at the end of the 2020-2021 monitoring period. The biggest net loss for schemes under construction was class B8 storage and distribution, amounting to 3,520 sqm. 1,787 sqm of this was demolished alongside 727 sqm of E9(g)(iii) light industrial floorspace to make way for a mixed-use student accommodation and 113 co-living apartment development at Kernal Court, Walnut Tree Close, Guildford<sup>27</sup>. The student accommodation element of this was phase 2 of the Scape Student Living scheme (phase 1 was constructed as a 114-unit five-storey development to the immediate north of the site).
- 4.6. The other scheme under construction involving loss of B8 floorspace was the proposed change of use of a vacant 1,733 sqm warehouse on Slyfield Industrial Estate (The Hub, 2 Thornberry Way) to a motorcycle storage and sales building (sui generis) with associated offices and workshop<sup>28</sup>. Unimplemented schemes involving loss or gain of employment floorspace

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<sup>26</sup> See [https://www.planningportal.co.uk/info/200130/common\\_projects/9/change\\_of\\_use](https://www.planningportal.co.uk/info/200130/common_projects/9/change_of_use) for more details of the new use classes and the transitional arrangements for determining applications.

<sup>27</sup> See application ref. 19/P/00267.

<sup>28</sup> See application ref. 20/P/01261.



## Unimplemented schemes involving loss or gain of employment floorspace

- 4.7. Approved planning applications proposing a change in use class E(g), B2 or B8 floorspace that remained unimplemented at the end of the 2020-21 monitoring period (pipeline schemes) comprised a sizable net gain of 3,645 sqm of office (class E(g)(i)) floorspace. The bulk of this was from the proposed redevelopment of Unit 4, Guildford Business Park, which was set to provide a net additional 2,393 sqm office space<sup>29</sup>. The other unimplemented office schemes were a new office at 32 London Road, Guildford (316 sqm); the proposed extension of Crossweys House, 28-30 High Street, Guildford to provide an additional 269 sqm office space; and a new building at Guildford Boat House, Millbrook, proposed to provide 667 sqm office space.
- 4.8. A small loss of 219 sqm light industrial (class E(g)(iii)) floorspace remained unimplemented as part of a planning application approved in November 2020 for change of use of a horological workshop at 204 Worplesdon Road to a single dwelling.
- 4.9. The net increases in B2 and B8 floorspace of 1,922 sqm and 1,400 sqm respectively were set to arise primarily from an application to change of use of the Jaguar Land Rover Garage at Astolat Way, Peasmarsh from car showroom (Sui Generis), workshop, MOT test centre and offices to a flexible B1 (a, b and c)/E(g)(i, ii and iii), B2 and B8 use<sup>30</sup>

## Retail floorspace

Figure 2: Net\* sqm retail (Class A) floorspace granted planning permission, under construction and completed, 1 April 2020 to 31 March 2021 (Borough-wide)



<sup>29</sup> See application ref. 20/P/00295.

<sup>30</sup> See application ref. 20/P/00567.

Table 15: Net completions and commencements for retail use classes (1 April 2020 to 31 March 2021)

Use class	Net completed (sqm)	Net under construction (sqm)	Net unimplemented (sqm)
Shops (E(a) / A1)	-90	0	1006
Financial and professional services (E(c) / A2)	0	0	-307
Restaurants and cafes (E(b) / A3)	23	0	281
Drinking establishments (sui generis / A3)	0	0	38
Hot food takeaway (sui generis / A5)	128	0	0
Total	61	0	1018

*\*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.*

- 4.10. Table 15 (above) shows permitted gains and losses of floorspace in use as shops, financial and professional services, restaurants and cafes, drinking establishments and hot food takeaways across the Borough during the monitoring period (1 April 2020 to 31 March 2021).
- 4.11. Use Classes A1, A2 and A3 were revoked from 1 September 2020 and replaced by the new Class E (a, b, c). The old use classes have been shown after the new ones in the table above for ease of reference as the date the applications were submitted affected how they were determined. For planning applications submitted from 1 September 2020, Class A1/2/3 uses are treated as Class E and Class A4/5 uses are treated as sui generis. For applications for prior approval, the previous class A uses were used until the end of July 2021<sup>31</sup>.

### **Retail Floorspace Completed**

- 4.12. There was a small net loss of 90 sqm of class E(a) retail floorspace during the 2020/21 monitoring year, from changes of use of a shop to a dog grooming salon, and from a dry cleaner to a hot food takeaway. The latter application was on a site within the designated Burpham local shopping centre although was not considered likely to result in adverse impacts on amenity, or the centre's character, vitality and viability.

### **Retail floorspace under construction**

- 4.13. No retail or other former Class A uses were recorded as under construction at the end of the 2020/21 monitoring period.

<sup>31</sup> See [https://www.planningportal.co.uk/info/200130/common\\_projects/9/change\\_of\\_use](https://www.planningportal.co.uk/info/200130/common_projects/9/change_of_use) for more details of the new use classes and the transitional arrangements for determining applications.

### **Unimplemented schemes involving loss or gain of retail floorspace**

- 4.14. Sites with planning permission that remained unimplemented at the end of the monitoring period were proposed to result in a net gain of just over 1,000 sqm retail Class E(a) floorspace, arising from a handful of schemes. The largest of these comprised over 630 sqm, from the proposed redevelopment of a betting shop (sui generis) to a retail use to form part of the existing Premier convenience store at 270-274 Southway, Westborough (Park Barn Parade).

### **Retail floorspace surveys**

- 4.15. The Council normally 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 Report<sup>32</sup>, alongside analysis and comparison with survey data for previous years from 2015 onwards.
- 4.16. 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 period<sup>33</sup>, it was decided not to undertake any retail surveys in May 2021 due to the heightened risk of infection to Council staff or anyone else whom they may come into contact with while doing so. The Council intends to undertake surveys when it considers it reasonably safe to do so.
- 4.17. 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 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.
- 4.18. The vacancy rate for Guildford town centre in May 2021 according to these surveys was 13.6% (see table 16 below). Whilst still above both the national and regional average, the rate had fallen by 1.2% below its previous level of 14.8% in October 2020. By contrast the rates for the UK in the same month had risen slightly between these dates (from 11.3% to 11.5% in the UK and from 11.2% to 11.5% in the South East).

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<sup>32</sup> [https://www.guildford.gov.uk/media/31295/Annual-Monitoring-Report-2018-2019/pdf/Annual\\_Monitoring\\_Report\\_2018-19.pdf?m=637124385667130000](https://www.guildford.gov.uk/media/31295/Annual-Monitoring-Report-2018-2019/pdf/Annual_Monitoring_Report_2018-19.pdf?m=637124385667130000)

<sup>33</sup> <https://www.gov.uk/guidance/working-safely-during-coronavirus-covid-19>

Table 16: Vacancy rate (%) for ground floor town centre retail units, July 2019 – May 2021

Area	May 2021	October 2020	July 2020	January 2020	July 2019
Guildford	13.6 (13.7*)	14.8 (14.7*)	12.4	7.6	7.6
South East	11.5	11.2	10.7	9.7	9.2
UK	11.5	11.3	10.8	9.8	10.10

Source: Experience Guildford and Springboard. \*Adjusted % based on units within the PSA boundary

- 4.19. 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. 8 of the 67 units reported as being vacant by the BID in May 2021 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 13.9%, which is marginally (0.1%) above the BID's recorded vacancy rate for its own town centre survey area.
- 4.20. The majority of the vacant units fell within the High Street, Upper High Street, North Street, Friary Centre, Tunsgate and Tunsgate Quarter (albeit three units in Tunsgate/Tunsgate Quarter that were vacant in October 2020 were reoccupied in May 2021). However, there were also a number of vacant units 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 only 2 out of 20 units in White Lion Walk was vacant (Units 6 – formerly Trotters and 23 – formerly Vapestore).
- 4.21. Compared to the October 2020 survey data there was little overall change in the units which were vacant although there were signs of improvement with five fewer units recorded vacant across the whole PSA in May 2021.
- 4.22. 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 is still reeling from the effects of the Covid-19 pandemic lockdowns and restrictions on in-store shopping. The vacant units 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 since the start of the pandemic due to restrictions and/or risk averse behaviour from shoppers affecting their sales.
- 4.23. It is anticipated that retail vacancies may gradually reduce further as the risk from the pandemic starts to lessen and social distancing restrictions are relaxed. The Council will continue to monitor vacancies and the extent to which there is a recovery in this regard.

## 5. Planning Contributions

### Community Infrastructure Levy ('CIL')

- 5.1. 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.
- 5.2. 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.
- 5.3. The Council is undertaking further viability work during 2021-22 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 has 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.
- 5.4. The CIL must be based on Local Plan development and infrastructure, and CIL rates are informed by viability evidence.
- 5.5. 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.
- 5.6. 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>.

### Section 106 Annual Review

- 5.7. 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.
- 5.8. This year, and for future AMR publications, Section 106 figures will be published via Guildford Borough Council's Annual Infrastructure Funding Statement. This will be available to view on the Council's website at the end of the year (2021).

### **Thames Basin Heaths Special Protection Area**

- 5.9. 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).

## 6. Duty to Cooperate

- 6.1. The duty to cooperate ('DtC') was introduced by the Localism Act 2011<sup>34</sup>. 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.
- 6.2. 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.
- 6.3. 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 Authority Monitoring Report.

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<sup>34</sup> Available online at: <http://www.legislation.gov.uk/ukpga/2011/20/contents/enacted>.

## 7. Evidence Base

7.1. 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.*

7.2. 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.

7.3. 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](https://www.guildford.gov.uk/newlocalplan/media/26763/Submission-core-and-supporting-documents/pdf/Submission_core_and_supporting_documents.pdf).



## 8. Appendices

### 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
<b>Surrey County Council</b>	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
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	✓	✓	✓	✓	✓	✓		✓	✓		✓
<b>Hampshire County Council</b>				✓	✓			✓	✓	✓	
Hart District Council					✓						
Rushmoor Borough Council	✓	✓	✓	✓	✓			✓	✓		✓

<b>Prescribed Bodies</b>											
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 2021

### 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 2017<sup>35</sup>. 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') 36 delivery and capacity within the borough,
- Housing provision in the 400 metre exclusion zone and zone of influence<sup>37</sup>,
- Our programme for future provision of SANG,
- Monitoring data relating to Strategic Access Management and Monitoring ('SAMM')<sup>38</sup> 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 SPA<sup>39</sup>. 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.

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<sup>35</sup> Available online at: <https://www.guildford.gov.uk/tbhspa>.

<sup>36</sup> See the SPA strategy page 15 for an explanation of SANGs

<sup>37</sup> See the SPA strategy page 10 for an explanation of the exclusion zone and zone of influence.

<sup>38</sup> See the SPA strategy page 27 for details of the SAMM project.

<sup>39</sup> See Natural England Commissioned Report NECR136  
<http://publications.naturalengland.org.uk/publication/4514481614880768>.

SANG Site	Contributions received from September 2006 to end of March 2021	Expenditure incurred from September 2006 to end of March 2021
Chantry wood	£4,654,163	£284,808
Effingham Common	£2,501,952	£93,664
Lakeside Nature Reserve	£765,399	£221,618
Riverside Nature Reserve and Parsonage Watermeadows	£3,469,349	£704,323
Sub Totals	£11,390,863	£704,323

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,. The table below sets out the position at the end of June 2021.

SANG Site	Total amount of SANG (hectares)	SANG already allocated (hectares)	Remaining SANG (hectares)
Riverside Nature Reserve and Parsonage Watermeadows	24	24	0
Effingham Common	34	14.2	19.8
Lakeside Nature Reserve	4	3.8	0.2
Chantry Wood	38	33.3	4.7
Ash Green Meadows (inc. Bin Wood)*	26.2	22.1	4.1
Runfold Ridge (Manor Farm)*	17.7	7	10.7
Remaining overall			39.5

\*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 39.5 hectares, which equates to around 2,057 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 3.7 years (2,057 new homes, divided by 562 homes per year = 3.7 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 to bring the SANG online is nearing completion. 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 works are complete but it is not clear whether this SANG will have capacity that could be available for developments in Guildford borough. The SANG is expected to open in Summer 2021.

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 2021 we have passed £2,296,177 to Hampshire County Council (who host the SAMM project) for this purpose.