	<p>Surrey Heath Borough Council</p> <p>Pre-Submission Surrey Heath Local Plan (2019 – 2038) : (Regulation 19)</p> <p>Representation Form</p>	<p>Ref:</p> <p>(For official use only)</p>
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Please return to: planning.consultation@surreyheath.gov.uk
OR
Planning Policy and Conservation, Surrey Heath Borough Council,
Surrey Heath House, Knoll Road, Camberley, Surrey GU15 3HD.

By 12.00 noon 20th September 2024 NO LATE REPRESENTATIONS WILL BE ACCEPTED

This form has two parts:
Part A – Personal Details
Part B – Your representation(s). (Please be aware that this together with your name will be made publicly available)
Please fill in a separate sheet for each representation you wish to make.

Surrey Heath Borough Council's Privacy Statement is [here](#).

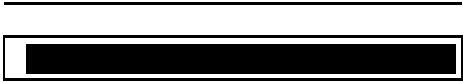
Please read the separate guidance notes before completing this form.

Part A

1. Personal Details*		2. Agent's Details (if applicable)	
<i>*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.</i>			
Title	Mr	Mr	
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Last Name	Smith	Crickett	
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E-mail Address

c/o agent



Do you wish to be notified of when any of the following occurs? (place an X in the box to indicate which applies)

	Yes	No
• The Pre-Submission Local Plan has been submitted to the Secretary of State for independent examination?	Yes	
• The independent examiner's recommendations are published?	Yes	
• The Local Plan has been adopted?	Yes	

Please note that your formal comments (known as representations) and your name will be made available on the Council's website. All other details in Part A of this form containing your personal details will not be shown.

The Council cannot accept confidential comments as all representations must be publicly available.

Part B – Please use a separate sheet for each representation

Your representation should cover all the evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation :	Boyer
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3. To which part of the Pre-Submission Local Plan does this representation relate?

Paragraph	<input type="text"/>	Policy	<input type="text"/>	Other, e.g. policies map, table, appendix	<input type="text"/>
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See separate accompanying Statement.

4. Do you consider the Pre-Submission Local Plan is? (place an X in the box to indicate which applies)

4.(1) Legally compliant (please refer to guidance notes)	Yes	<input type="text"/>	No	<input type="text"/>
4.(2) Sound (please refer to guidance notes)	Yes	<input type="text"/>	No	No
4.(3) Complies with the Duty to Co-operate (please refer to guidance notes)	Yes	<input type="text"/>	No	No

5. Please give details of why you consider the Pre-Submission Local Plan is not legally compliant or does not meet the tests of soundness or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Pre-Submission Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments. You are advised to read our Representations Guidance note for more information on legal compliance and soundness.

See separate accompanying Statement for full details.

(Continue on a separate sheet / expand box if necessary)

6. Please set out what modification(s) you consider necessary to make the Pre-Submission Local Plan legally compliant and sound, having regard to the matters you have identified at 5 above.
(Please note that non-compliance with the duty to co-operate is incapable of modification at examination)
You will need to say why each modification will make the Pre-Submission Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

See separate accompanying Statement for full details.

(Continue on a separate sheet / expand box if necessary)

Please note your representation should cover succinctly all the evidence and supporting information necessary to support/justify your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions will be only at the request of the Planning Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification to the Pre-Submission Local Plan, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes

Yes, I wish to participate at the oral examination

Please note - whilst this will provide an initial indication of your wish to participate in the examination, you may be asked at a later point to confirm your request to participate.

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

See separate accompanying Statement for full details.

Please note - the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.



Surrey Heath Local Plan – Regulation 19 Representation

Land at Grove End, Bagshot

Boyer

Prepared on behalf of Somerston Developments | September 24

REPORT CONTROL

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APPENDICES

Appendix 1 – Site Location Plan

Appendix 2 – Affordable Housing Need Assessment

Appendix 3 – Land at Grove End, Green Belt Analysis

Appendix 4 – Start to Finish 3rd Edition

Appendix 5 – SoS Letter to Local Authorities (30 July 2024)

Appendix 6 – Elmbridge Local Plan Inspector’s Interim Findings Letter (11 September 2024)

1. INTRODUCTION

- 1.1 Boyer has prepared these representations on behalf of Somerston Developments Ltd ('Somerston'), in response to Surrey Heath Borough Council's 'Regulation 19' Consultation on the emerging Pre-Submission Surrey Heath Local Plan (2019-2038).

Scope of Representations

- 1.2 The purpose of these representations is to assist Surrey Heath Borough Council ('the Council') in formulating an approach within the emerging local plan ('ELP') that is both consistent with national planning policy and the tests of soundness.
- 1.3 In this regard, our representations relate to the *tests of soundness* set out at paragraph 35 of the National Planning Policy Framework ('NPPF') (December 2023); namely, whether the emerging local plan is:
- a. **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - b. **Justified** – representing an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - c. **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred; and
 - d. **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies of the Framework and other statements of national planning policy, where relevant.
- 1.4 At this stage of the plan-making process, it is vitally important that the Council seeks to pursue an approach that is *consistent with national policy, effective, justified, and positively prepared*, in order for the plan to be found *sound* at examination. These representations comprise our recommendations to assist the Council in achieving such an approach as the emerging plan progresses toward adoption.
- 1.5 These representations are also made with respect to the ongoing promotion of the Land at Grove End, Bagshot ('the site') for residential development, over which Somerston holds a specific land interest. These representations are aligned with this land interest and address topics within the consultation, and its supporting evidence base, accordingly.
- 1.6 The site is capable of delivering up to 135 homes, including a minimum of at least 50% affordable housing. Furthermore, the intention is to deliver all 135 of the homes as affordable housing. The Site Location Plan is included at **Appendix 1**.
- 1.7 These representations should be considered in combination with our previous submissions as part of the Council's Regulation 18 'Preferred Options' Consultation, which ran from 14 March to 09 May 2022.

- 1.8 At the end of July 2024, the Government commenced a consultation on a number of proposed amendments to the December 2023 NPPF. The amendments will make significant changes to national policy – notably in context of significantly boosting the supply of new homes: and specifically affordable homes. Alongside the consultation, the Government has consulted on a new standard method of calculating local housing needs.
- 1.9 The Secretary of State for Housing, Communities and Local Government ('SoS') published a Written Ministerial Statement ('WMS') on 30 July 2024 alongside a letter to Councils, which provide further context to the proposed amendments to the NPPF. In the WMS, the SoS is clear that the proposed amendments to the NPPF represent a clear and purposeful direction of travel, toward ensuring that there are a sufficient number of homes being built, and that they are being delivered in sustainable locations.
- 1.10 Noting the proposed changes to the NPPF and the outcome of the new Standard Method for Surrey Heath Borough, and many of its neighbouring councils – including Hart District – there is a strong possibility that even if the current DLP continues to be progressed toward adoption (which appears to be the Council's intention), the Council will be required to immediately prepare a new plan that is consistent with the proposed NPPF changes.
- 1.11 Whilst our comments in these representations to the Regulation 19 DLP are therefore rightly based on the current NPPF, we have also referred to some of the potential impacts of the proposed changes within our representations.

Policy Context

- 1.12 Surrey Heath Borough Council ('SHBC', or 'the Council') adopted its 'Core Strategy and Development Management Policies Development Plan Document' ('the Core Strategy') in 2012. The Core Strategy sits alongside the extant saved policies from the Local Plan (2000) and the Camberley Town Centre Area Action Plan (2011 – 2018), and relevant adopted Neighbourhood Plans, as the Council's adopted Development Plan.
- 1.13 The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) requires local planning authorities to review local plans at least once every 5 years from their adoption date. This is intended to ensure that planning policies remain relevant and able to effectively meet the needs of the local community.
- 1.14 The emerging Local Plan (2019 – 2038), which is the subject of this Regulation 19 Pre-Submission Consultation, represents the progression of this review process. The emerging Plan sets out an updated vision and strategy, alongside an updated series of site allocations and policies that would supersede the adopted Core Strategy upon its adoption. Somerston supports the Council's commitment to review the local plan.

Structure of Representations

- 1.15 The structure of our representations seeks to respond to the specific format of the Pre-Submission Regulation 19 Consultation, directly correlating to the format of the policies where possible. Our representations are set within the context in which we seek to highlight, where relevant, the opportunities that are presented by the proposed allocation of the Land at Grove End, Bagshot ('the site') for development.
- 1.16 Accordingly, the following sections of these representations are set out as follows:
- **Section 2:** Housing Requirement,
 - **Section 3:** Exceptional Circumstances - Green Belt Release,
 - **Section 4:** Spatial Strategy,
 - **Section 5:** Consultation on Changes to the NPPF,
 - **Section 6:** Land at Grove End, Bagshot,
 - **Section 7:** Comments On Other Policies, and
 - **Section 8:** Summary and Conclusions
- 1.17 We trust that our comments are of assistance to the Council in formulating an approach that is *positively prepared, effective, justified, and consistent with national policy*, as the emerging Local Plan progresses toward adoption.
- 1.18 Somerston firmly contends that the spatial strategy set out by the Council currently comprises an approach that is **unsound**. The reasons supporting this view, and our recommendations to resolve our concerns, are set out in the following sections of these representations.

2. HOUSING REQUIREMENT

Introduction

- 2.1 In this section, our position is detailed with regard to the proposed Housing Requirement identified within the Regulation 19 Draft Local Plan ('DLP'). The discussion provides context to our subsequent consideration of the Council's approach to Green Belt release and proposed Spatial Strategy, set out in Sections 3 and 4 of these representations.
- 2.2 In summary, Somerston considers that the Council has not set an appropriate Housing Requirement, insofar as it fails to sufficiently address four core areas, specifically:
- a. setting an appropriate plan period,
 - b. the apportionment of unmet need to Hart District & the Duty-to-Cooperate,
 - c. the substantial need for affordable housing specifically, and
 - d. the sustained worsening affordability of housing within the Borough.
- 2.3 Once these considerations are taken into account, it is clear that the Housing Requirement must necessarily be revised upwards. It follows that the Council's approach to Green Belt release and proposed Spatial Strategy is then fundamentally incapable of meeting the actual housing needs of the Borough and, consequently, represents an approach that is **unsound**.
- 2.4 The necessary uplift that must be applied to the Councils' proposed Housing Requirement has direct consequences for the derivation of an appropriate Spatial Strategy.
- 2.5 Given the significant housing needs of the Borough, *exceptional circumstances* exist to justify (and indeed necessitate) the release of poorly performing, sustainably located sites within the Green Belt for residential development. The Council must therefore consider the allocation of otherwise *suitable*, sustainably located Green Belt sites in order to meet that need, such as the Land at Grove End, Bagshot.

The Council's Approach

- 2.6 The DLP identifies that its strategic policies should be informed by an assessment of Local Housing Need ('LHN').
- 2.7 In accordance with national policy, the Council utilises the Government's Standard Method as the starting point for considering the Housing Requirement. The Council proposes that the Standard Method should be utilised to form the baseline housing need for the 2019 – 2038 plan period. The Council contends that this comprises 321 dwellings per annum ('dpa'), or a total of 6,111 over the plan period.
- 2.8 The Council then proposes to reduce this requirement to reflect a commitment from Hart District to meet 41 dpa of Surrey Heath's previous unmet need up to 2032. The Council therefore concludes that the appropriate Housing Requirement for Surrey Heath over the plan period is 5,578 homes. This approach is problematic for several reasons.

Establishing the Appropriate Plan Period

Setting the Base-Date

- 2.9 The NPPF (December 2023) is clear, at paragraph 22, that ‘...*Strategic policies should look ahead over a minimum 15 year period from adoption...*’ (emphasis added).
- 2.10 As set out at paragraph 20 of the NPPF, strategic policies are those which ‘...*set out an overall strategy for the pattern, scale and design quality of places (to ensure outcomes support beauty and placemaking), and make sufficient provision for: [inter alia] housing (including affordable housing)*’ (emphasis added).
- 2.11 In this regard, the proposed plan-period (2019 to 2038) is obviously **not consistent with national policy**. Indeed, in the absence of any discussion within the Housing Topic Paper (2024), or an equivalent report, it is unclear why the plan-period should commence in 2019, or end in 2038. In this respect, the proposed plan period is **not justified**.
- 2.12 The emerging plan’s period should reflect the base-date of the monitoring period in which its housing requirement is calculated. National planning policy is clear that this should be the current year (i.e. 2024/25). However, the DLP is proposed to commence in 2019/20, which is problematic when relying upon the Standard Method for calculating housing need.
- 2.13 The Standard Method utilises population projections from the relevant base year (in this case, from 2024), alongside housing affordability data (in this case, including up to March 2023). Therefore, in commencing the emerging plan period during the 2019/20 monitoring period, the Council is proposing to retrospectively apply an LHN figure during the 2019/20 – 2023/24 period, to which the calculation does not relate.
- 2.14 In the absence of any explanation and compelling justification, the plan period should be rebased to commence in 2024/25 at the earliest (calculated as at 1 April 2024).
- 2.15 Furthermore, another concern is that in proposing to commence the Plan period at 2019/20, the 1,501 recorded completions from existing allocations and other committed developments during the four-year 2019/20 – 2022/23 period are set to contribute to delivery within the new Local Plan-period, despite having already been completed.
- 2.16 Such completions comprised an average annual delivery of +375dpa against an equivalent ‘housing requirement’ over the period of 320dpa (or 289 if unmet need is apportioned to Hart District). This provides an ‘artificial’ boost to supply, by capturing recent years of comparatively high delivery, which followed an earlier period of average under-delivery over the first half of the Core Strategy period to date, between 2012/13 to 2017/18.

- 2.17 This approach is inconsistent with the Planning Practice Guidance (PPG)¹, which confirms that the Standard Method seeks to address (albeit indirectly) previous undersupply, through the affordability ratio uplift. As currently formulated, the DLP artificially seeks to offset ‘overprovision’ of recent years against the forward-looking requirement, despite this falling within a context of prior underprovision over the earlier Core Strategy period.
- 2.18 Furthermore, the Local Housing Need Assessment (‘LHNA’) (March 2024), which comprises the principal component of the emerging Local Plan’s housing needs evidence base was prepared and published during the 2023/24 period. This assessment forms the basis for the Council’s assessment of affordable housing needs, and other specialist accommodation.
- 2.19 In this context, it would appear nonsensical to include four years’ of prior housing completions during 2019/20 – 2022/23 within the emerging local plan period, which would have directly impacted the assessment of housing needs that the remainder of the plan period is seeking to address.
- 2.20 Somerston therefore firmly contends that the emerging local plan period should be re-based to the monitoring period in which the Housing Requirement is calculated (which should be 2024/25). The proposed plan period is considered to be ***unsound*** on this basis, insofar as it is ***not positively prepared, effective, or consistent with national policy***.
- 2.21 In re-basing the plan period to 2024/25, the Council must also not neglect to address the present accumulated shortfall in affordable housing delivery over the 2020/21 to 2040/41 period to date:
- The LHNA (2024) identifies an objectively assessed need for 250 net affordable homes per annum between 2020/21 and 2040/41.
 - In the first three years of the LHNA (2024) period, the Council has overseen the delivery of just 217 affordable homes (net of Right to Buy losses) against an assessed need of 750 net new affordable homes, which has resulted in an accumulated shortfall to date over the assessment period of -533 affordable homes.
- 2.22 Somerston considers that any shortfall in delivery measured against the LHNA (2024) assessed need, accumulated up to the base-year of the plan period, should be dealt with within the next five years. Failing this, whilst unfavourable the backlog as a minimum should be addressed over the revised plan period.
- 2.23 This is also an approach set out within the PPG² and endorsed at appeal. It would also be consistent with the views of the Inspector undertaking the examination of the Elmbridge Local Plan; wherein at Paragraph 29 of the Inspector’s Interim Findings Letter, dated 11 September 2024 (see **Appendix 6**), the Inspector concluded that:

¹ Paragraph: 011 Reference ID: 2a-011-20190220.

² Paragraph: 031 Reference ID: 68-031-20190722.

‘Given the acute position regarding current affordable housing need, the scale of the backlog and the ever-worsening position regarding affordability ratios within Elmbridge, it is my view that the Council should seek to address the backlog during the plan period’ (emphasis added).

Setting the End-Date for the Plan Period

- 2.24 The proposed plan period also fails to extend over a minimum 15 years from the point at which the plan is expected to be adopted, as required by paragraph 22 of the NPPF.
- 2.25 The Council’s published Local Development Scheme indicates that the Council expects to adopt the DLP in Autumn 2025 (in the 2025/26 period). The plan period will therefore need to be extended to cover at least the 2040/41 period, to ensure there is at least 15 years remaining post adoption.
- 2.26 Following similar concerns, Inspectors examining the West Berkshire Local Plan and North Norfolk Local Plan have required these plan’s periods to be extended in response to paragraph 22 of the NPPF. And for the starting point of the plan’s to be brought forward a year to reflect national policy regarding the assessment of housing needs.
- 2.27 In particular, paragraph 6 of the Inspector’s post hearing note on the North Norfolk Local Plan is clear that in relation to a plan period starting in 2016 and ending in 2036:

‘At present, there are only 12 years of the plan period remaining, and once the further steps necessary to ensure a sound plan have been taken, it is likely to be nearer to 11 years. The National Planning Policy Framework (NPPF) states in paragraph 22 that strategic policies should look ahead a minimum 15 years from adoption, and to be consistent with this the plan period should be extended to 31 March 2040 to allow for adoption during the next 12 months. Turning to the base date of the plan, this should correspond to the date from which the housing needs of the district are quantified. As set out in paragraph 12 below, this should be April 2024. The plan period should therefore be 2024-40’.

- 2.28 Such an approach would also be consistent with that taken in the emerging Crawley Local Plan, wherein the proposed plan period has been extended to include the 2039/40 monitoring period as part of the Inspector’s Main Modifications. This was considered to be necessary for the plan to be found *sound*, and in our view is the case also for Surrey Heath.
- 2.29 To be *consistent with national policy* and as such to be *sound*, the plan period must therefore be amended to start in 2024/25 and end in 2040/41.

Effect of Amending Plan Period on Housing Requirement

- 2.30 The consequence of re-basing and extending the proposed plan period is that the Housing Requirement would comprise +5,120 homes over the 16-year period, based on the current Standard Method figure of 320 dpa (calculated as at 1 April 2024).
- 2.31 Over the same period, the Council’s housing trajectory currently provides for +4,149 new homes, as set out in the Housing Topic Paper (2024), which results in a shortfall of -971 homes total over the revised plan period.

- 2.32 This assumes no apportionment is made for unmet need to be delivered in Hart District. However, accounting for the unmet need provision in Hart within the updated plan period (comprising 328 units over the 8-year period 2024/25 – 2031/32), the shortfall will still remain at -643 dwellings.

Unmet Need Apportionment to Hart

- 2.33 The Council is seeking to reduce its Housing Requirement below the Local Housing Need figure of 321 dpa (as derived via the current Standard Method as at April 2021). Relying upon Hart District Council's previous commitment to meeting 41dpa of Surrey Heath Borough's previously unmet housing needs up to 2032.
- 2.34 This commitment has been reaffirmed within the published Statement of Common Ground ('SoCG') between the Councils dated July 2024. However, in our view, it should no longer be relied upon.
- 2.35 Significantly, the SoCG between the Councils has been formalised prior to (and does not take account of) the Government's consultation on proposed amendments to the NPPF that were published on 28 July 2024. As intimated previously, the consultation includes amendments to the Standard Method of calculating Local Housing Needs, which results in a significant uplift in assessed housing needs for both Surrey Heath and Hart District.
- 2.36 In accordance with the proposed new Standard Method, Surrey Heath's LHN figure is set to significantly increase from 320dpa up to 658dpa, an increase of +105%. Hart District's housing need is similarly set to increase significantly, from 297dpa to 734dpa, an increase of +147%.
- 2.37 The assumptions by both authorities underpinning the SoCG, namely that the existing agreement will or can continue to be honoured, need to be wholly revisited and must be re-considered in this context.
- 2.38 To expand on this point, in its Five-Year Housing Land Supply trajectory (as at 1 April 2023), Hart District Council projects a forward-looking supply over the next five years of just +1,704 new homes set against a potential Standard Method housing need figure of +3,670 if the new calculation is carried forward. This would result in a shortfall in the region of -1,966 homes against Hart District's own housing needs up to 2027/28. Ongoing shortfall will likewise continue thereafter.
- 2.39 In this context, it appears entirely likely that the existing commitment to provide 41dpa of unmet need from Surrey Heath in Hart District will come under significant scrutiny through the next Hart District local plan review. A review that will need to commence very shortly itself. There is no reliable guarantee that Hart will be capable of continuing delivering on the commitment until 2032, as is suggested in the SoCG and the draft local plan.
- 2.40 The Council must therefore address with Hart District the extent to which this commitment is still relevant. This is particularly important as the adopted Hart local plan will be 'out of date' from April 2025. In this impending context, Hart District would be unable to meet its own needs to 2032, let alone continuing to support the housing needs of Surrey Heath during this period.

- 2.41 The outcome of such discussions will have a critical impact on the emerging Surrey Heath local plan, including the extent to which the Plan can meet assessed housing needs in full. Accordingly, these discussions must be undertaken and concluded prior to the Plan's submission for examination.
- 2.42 In the absence of such discussions, Somerston would consider this to be a failure to co-operate effectively on this key strategic issue. In this context, the emerging plan would not be legally compliant with Section 33A(1) of the Planning and Compulsory Act (2004).
- 2.43 It is notable in this context that Hart District Council's most recent Local Development Scheme was published in May 2019 and related to the current adopted development plan. There is currently no published programme to prepare an update to the District's adopted Local Plan. Hart District is set to 'review' its Local Plan policies by no later than April 2025, at which point the new Standard Method will likely be a material consideration.
- 2.44 In our view, given the uncertainty in relation to Hart District's ability to commit to continue meeting Surrey Heath's unmet needs, the Housing Requirement for Surrey Heath should not include a reduction of 41dpa up to 2032. To rely upon the previous agreement, which is considered to now be substantially out of date, would **not** be *justified*, nor *effective*.
- 2.45 Furthermore, it is our firm view that the proposed Housing Requirement, based on the current LHN figure, is already too low, insofar as it does not provide a basis in which enough of the Borough's affordable housing needs can be met (this is set out in further detail later in these representations). Choosing to reduce the Borough's overall housing requirement based on a previous agreement, which may not be relied upon in any event, further reducing the Council's capability of meeting assessed needs, is in our view **wholly unjustified**.
- 2.46 This approach would be inconsistent with national planning policy; wherein the National Planning Policy Framework ('NPPF') (December 2023) is clear that the Government's objective is to '*significantly boost*' the supply of housing in England and that the overall aim should be to meet as much of an area's identified housing need as possible, including with an appropriate mix of housing types for the local community (paragraph 60).
- 2.47 The Council must explore all reasonable alternatives to meet this need within its administrative boundaries before it seeks to continue reliance on the earlier agreement for meeting 'unmet need' in another District.
- 2.48 The Council is capable, in our view, of meeting the Borough's own housing needs within the Borough by allocating otherwise suitable, sustainably located sites within the Green Belt. The Council has decided not to explore this option (aside from the Fairoaks Growth Scenario) in its 'Regulation 19' Sustainability Appraisal.
- 2.49 Indeed, the Land at Grove End, Bagshot, is capable of delivering an apportionment of affordable housing that is above policy requirement; with a minimum of 50% affordable housing provision, with the intention to deliver all of the new homes (100%) as affordable.

- 2.50 This was demonstrated through the recently refused outline planning application (SHBC ref. 23/1163/OOYU) and will continue to be demonstrated (to be secured as part of an appropriate legal agreement) through the ongoing Appeal submitted following the Council's final determination of the application.
- 2.51 In this regard, it would seem there is no case for 'unmet' need to continue being apportioned to Hart District when more of the Borough's housing needs are capable of being met within its administrative boundaries: as part of a sensible and pragmatic approach being taken in regard to potential release of appropriate Green Belt sites through the ELP.
- 2.52 As a final note, it is also prudent to acknowledge that continuing to apportion 41dpa of unmet need into Hart District will continue exporting provision of *circa* 115³ affordable homes (at 35% provision in accordance with Surrey Heath's current Core Strategy Policy CP5) outside of the Borough during the Plan's period - assumed starting from a rebased 2024 start date.
- 2.53 This is a significant number of affordable homes which otherwise should and can be provided for within the Borough if the emerging plan were taking a positive and justified approach.

Significant Need for Affordable Housing and Housing Affordability Crisis

The Significant Need for Affordable Housing

- 2.54 Surrey Heath Borough faces a significant need for affordable housing over the emerging plan period and beyond, as affirmed within the latest Local Housing Need Assessment ('LHNA') (2024).
- 2.55 The LHNA (2024) comprises the most up-to-date assessment of affordable housing need for the Borough, which identifies a total affordable need for 250 affordable homes per annum over the 20-year period 2020/21 to 2040/41.
- 2.56 Over the 2020/21 to 2040/41 period, this equates to a total objectively assessed need of 5,000 affordable homes within the Borough. An annual need of 250 affordable homes comprises some 78% of the Borough's current Standard Method figure.
- 2.57 To deliver the number of affordable homes that are needed within the Borough, the Plan would be required to identify a housing supply of at least 625 dwellings per annum (assuming the proposed 40% affordable housing policy requirement is taken forward).
- 2.58 This represents almost double the current Standard Method figure (but is less than the proposed new Standard Method figure for the Borough).
- 2.59 However, the draft plan's proposed 40% requirement for affordable housing, set out in Policy H7, is itself in many cases is not set to be delivered across the Borough, particularly with respect to brownfield site allocations and the draft Plan's main strategic site allocations. Moreover, as the Council's Viability Assessment demonstrates, it is unlikely to be viable for housing sites to deliver around 78% of housing as affordable housing products in most circumstances.

³ At 41dpa over the 8-year period 2024/25 to 2031/32 = 328 homes of unmet SHBC need. At 35% affordable provision, 115 affordable homes will be exported outside of Surrey Heath Borough.

- 2.60 Consequently, the only prospect for the Council to meet more of its assessed affordable housing need requires a simple solution; to allocate a greater amount of housing sites that will be capable of delivering at least 40% affordable homes.
- 2.61 Indeed, given the proposed amendments to the Standard Method and the provisions of Paragraphs 226 and 227 of the draft NPPF, the Council will need to cater for a similarly higher quantum of housing as part of an early/immediate review of the new plan (assuming it proceeds to adoption) in any event.
- 2.62 There is a clear case, therefore, for examining the extent to which further growth could be accommodated within the Borough through this current review to provide for the delivery of a sufficiently appropriate amount of affordable housing.
- 2.63 Such an approach would be consistent with national policy, insofar as the NPPF (December 2023) provides, at paragraph 60, that '*...it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed...*' (emphasis added).
- 2.64 Paragraph 63 is also clear that '*...Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing...*' (emphasis added).
- 2.65 Despite this, the Council's Sustainability Appraisal (2024) concludes, at paragraph 5.2.21, that '*...there is no potential to deliver affordable housing as a proportion of market housing at this rate...*', and simply dismisses outright the need to explore alternative growth options to secure a sufficient amount of affordable housing. This is a critical miss-step and points to an obvious weakness in the Plan's evidence-base.
- 2.66 In this regard, the proposed Spatial Strategy - at best - seeks to take forward the approach applied within the adopted Core Strategy (2012). In reality, the proposed Spatial Strategy set out in the emerging local plan is likely to be even less *effective*, as it includes significant discounts to affordable housing provision for a significant extent of the identified forward-looking supply, particularly at the proposed large-scale brownfield site allocations.
- 2.67 Examining the delivery record over the Core Strategy plan period, it is obvious that this approach has not been *effective*, and the proposed Spatial Strategy is set to continue this failure up to 2038:
- In the 12-year Core Strategy period to date (2011/12 to 2022/23), net affordable housing delivery in Surrey Heath has totalled 613 additions to affordable housing stock (net of Right to Buy sales) per annum. This is equivalent to just 18% of net overall housing completions (see **Appendix 2** which comprises an Affordable Housing Needs Assessment produced by Tetlow King, wherein specifically Section 3 demonstrates the Borough's past affordable housing delivery rate and acute shortfalls).
 - When net delivery is compared to affordable housing needs identified in the 2014 SHMA, a cumulative shortfall of -417 affordable homes has occurred in the same 12-year period.

- Furthermore, when net delivery is compared against the most recent assessment of affordable housing needs published alongside this Regulation 19 ELP in the LNHA (2024), a shortfall of -533 affordable homes has already occurred in the first three years of the LNHA's assessment period alone (2020/21 and 2022/23).

- 2.68 Noting the levels of acute delivery shortfall against both past and forward-looking affordable housing needs in the LNHA (2024), the emerging plan should be tasking itself with redressing the failings of the Borough's past approach(es) to meeting more of its affordable housing needs through the duration of the next plan period.
- 2.69 Somerston firmly contends that the Council must explore further growth potential within the Borough, to determine the extent to which the emerging plan should and can reasonably allocate additional sites for residential-led development to provide for the delivery of a greater amount of affordable housing toward meeting more of the Borough's needs.

The ELP's Proposed Plan-Led Delivery of Affordable Housing

- 2.70 Put simply, our concern is that by setting the Housing Requirement at the minimum Standard Method figure, the Borough will continue to fail to meet its assessed affordable housing needs over the emerging plan period.
- 2.71 In this regard, whilst the Borough has been meeting its overall housing requirement – demonstrated most recently by the published housing delivery test results, it has resoundingly failed to meet affordable housing needs. To avoid the same failures moving forward it is important to examine the extent to which the ELP's proposed plan-led solution is capable of meeting affordable housing needs over the proposed plan period.
- 2.72 The assessment set out in Table 2.1 (below) identifies that the proposed Spatial Strategy is seriously flawed insofar as there is no realistic possibility that the Borough's assessed affordable housing needs, or the needs it's purporting to meet, will be met over the plan period.
- 2.73 Table 2.1 provides an indicative assessment of future affordable housing provision set out in the Council's ELP, based on the specifically allocated sites. Somerston invites the Council to submit a detailed table that sets out the committed and projected affordable housing provision expected over the proposed plan period, such that the intended supply can be properly further scrutinised.
- 2.74 In the absence of any evidence currently presented by the Council, we reserve the right to submit further detailed evidence as part of the Examination, to assist the Inspector's understanding on this critical matter.

Table 2.1 Assessment of Affordable Housing Delivery of Site Allocations

Proposed Site Allocation	Overall Housing Provision	Assumed / Stated Affordable Housing % Requirement	Affordable Housing Provision
HA1/01 - Bagshot Depot and Archaeology Centre	50	40%	20
HA1/02 - Camberley Centre	35	40%	14
HA1/03 - Camberley Station	150	25%	38
HA1/04 - York Town Car Park	27	40%	11
HA1/05 - Sir William Siemens Square	170	20% ⁴	34
HA1/06 - Chobham Rugby Club	91	40%	36
HA1/07 - St James House	35	25%	9
HA1/08 - Land off Spencer Close	60	40%	24
HA1/09 - Former Portesbery School	36	25%	9
HA1/10 - Land rear of 192-210 London Road	20	40%	8
HA1/11 - The Deans, Bridge Road, Bagshot	20	40%	8
HA1/12 - 317 to 319 Guildford Road, Bisley	17	40%	7
HA1/13 - 280 Gordon Avenue, Camberley	15	40%	6
HA1/14 - Burwood House Hotel, 15 London Road, Camberley	10	40%	4
HA1/15 - 439 - 445 London Road, Camberley	15	40%	6
HA1/16 - Land Rear of 1 - 47 Sullivan Road, Camberley	14	40%	6

⁴ Reflects Planning Permission (24/0116/FFU).

HA1/17 - Broadford, Castle Grove Road, Chobham	15	40%	6
HA1/18 - Land North of Guildford Road, Deepcut	21	40%	8
HA1/19 - Former Premier Site, Newfoundland Road, Deepcut	13	40%	5
HA1/20 - The Grange, St Catherines Road, Deepcut	17	40%	7
HA1/21 - 103 - 109 Guildford Road, Lightwater	21	40%	8
HA1/22 - Land adjacent to Sherrard Way, Mytchett	16	40%	6
HA1/23 - St Margarets Cottage and The Ferns, Woodlands Lane, Windlesham	16	40%	6
HA1/24 - Land East of Benner Lane, West End	16	40%	6
HA1/25 - Land at Chamness, Woodlands Lane, Windlesham	20	40%	8
Policy HA2: London Road Block, Camberley Town Centre	550	20%	110
Policy HA3: Land East of Knoll Road, Camberley Town Centre	340	25%	85
Policy HA4: Mindenhurst, Deepcut	1,200	20% ⁵	240
	Total Actual Dwellings	Average Affordable Provision	Total Actual Affordable
Total	3,010	24%	736

⁵ Assumed to average 20%, based on comments made in Officer's Report regarding overall affordable housing delivery rate (reference: 21/0004/DTC).

- 2.75 As shown by Table 2.1, the Council's proposed overall housing allocations taken in Policies HA1, HA2, HA3, and HA4, amount to a total housing provision of 3,010 homes. Of these, just ~736 planned affordable homes are expected to be provided (not including non-strategic existing commitments).
- 2.76 This results in an actual likely delivery rate of *circa* 24% affordable housing over the plan period from these sites. This represents a likely best-case scenario, with some sites potentially being incapable of delivering even the intended minimum requirements. Clearly, the DLP's allocations are not providing anywhere near this level of actual homes.
- 2.77 Furthermore, even in the Council's best-case scenario (i.e. 40% affordable housing provision across all sites), there would still be a significant shortfall against the assessed need of 250 affordable homes per annum. At best, the Council's identified supply would be capable of delivering just 131 affordable homes per annum (being 40% of total housing supply resulting in 2,232 affordable homes, divided by the proposed 17-year plan period).
- 2.78 This represents an **annual** shortfall of some -119 affordable homes **as a best-case scenario**, which as set out in Table 2.1 (above) is itself not set to be achieved in practice.
- 2.79 Given the observed historic failure to deliver sufficient affordable housing, in combination with the obvious deficiencies in the forward-looking position, it is clear a step-change is needed in Surrey Heath if more of the Borough's own affordable housing needs are ever likely to be met.
- 2.80 In this regard, Somerston contends that the proposed Housing Requirement (and corresponding Spatial Strategy) is **not positively prepared, effective, or consistent with national policy** on this basis.
- 2.81 Our conclusion is consistent with that of the Elmbridge Local Plan Inspector, recently expressed in Paragraph 26 of their Interim Findings letter, dated 11 September 2024, which is clear that:

'...the strategy as adopted would be unsound as it would also not be effective in addressing the acute affordable housing need of the borough, including the backlog...

'...Contrary to the views expressed by the Council, it is my view that the benefits of doing so would outweigh the harm to the Green Belt and as a result, exceptional circumstances do exist to warrant an element of Green Belt release. To conclude, having taken into account the circumstances set out above, the release of an element of Green Belt land to meet the identified housing needs would be a justified and effective approach in this instance' (emphasis added).

Housing Affordability Crisis

- 2.82 In the context of plan-making, the PPG recognises the importance of giving due consideration to market signals as part of understanding affordability.

- 2.83 Section 4 of the Tetlow King Affordable Housing Need Assessment included at **Appendix 2** provides detailed consideration of housing affordability trends in Surrey Heath over the 10-year period 2013/14 to 2021/22. In summary:
- Valuation Office Agency (“VOA”) and Office for National Statistics (“ONS”) data shows that Median and Lower Quartile private rents in Surrey Heath Borough have expressed a worsening trend over the 10-year period to 2021/22.
 - Likewise, ONS data demonstrates that both Median and Lower Quartile Workplace-Based Affordability Ratios (i.e., average household incomes compared with average house prices) have expressed a worsening trend over the same period.
 - In each instance, Surrey Heath Borough is consistently less affordable than at the wider County, Region, and National scales.
 - In the 2022/23 monitoring period, which follows the end of the assessment period in the AHNA, these indicators of housing affordability have worsened further in Surrey Heath Borough.
 - The Median Workplace-Based Affordability Ratio (i.e., median household income compared with median house price) in the Borough now stands at 12.08, a 29% increase since the start of the Local Plan period in 2011/12 where it stood at 9.36. The ratio of 12.08 in Surrey Heath stands substantially above the national median of 8.26 (+46%) and significantly above the South East median of 10.39 (+16%).
- 2.84 Overall, it is clear that market signals indicate a worsening trend in affordability in Surrey Heath. **By any measure of affordability, this is an Authority in the midst of an affordable housing crisis, and one through which urgent action must be taken to deliver more affordable homes.**
- 2.85 To assist in redressing this issue, we advocate that the Council should include further specific site allocations for otherwise suitable, sustainably located sites within the Green Belt. Such sites are often best placed to deliver comparably higher levels of affordable housing toward meeting more of the Borough’s overall affordable housing needs.
- 2.86 Somerston advocates allocation of the Land at Grove End, Bagshot in this regard. The site is capable of delivering a minimum of 50% affordable housing, with the intention of delivering up to 100% if possible.

3. EXCEPTIONAL CIRCUMSTANCES – GREEN BELT RELEASE

- 3.1 In light of the preceding commentary, we argue there is a cogent and compelling case for increasing the Housing Requirement in order to: remove the apportionment of ‘unmet’ need to Hart District; re-base and extend the plan period (including allocating additional sites to address the shortfall of between 677 and 971 homes); and, explore opportunities for higher growth beyond the current standard method derived minimum local housing need - to meet a greater proportion of the Borough’s affordable housing needs during the plan period.
- 3.2 In our view, meeting these housing needs, and specifically affordable housing needs, constitute *exceptional circumstances* facilitating amendment to the Borough’s existing Green Belt boundaries to be made.
- 3.3 We acknowledge the Council are seeking to achieve submission of a plan prior to a new NPPF being published (plus one month) to benefit from the proposed transitional arrangements which would see the new plan examined against the policies of the current December 2023 NPPF. We likewise acknowledge that the current NPPF states that there is no requirement for Green Belt boundaries to be reviewed or changed where plans are being prepared and updated.
- 3.4 Nonetheless, paragraph 145 of the current NPPF makes clear ‘Authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified, in which case proposals for change should be made only through the plan-making process’. Paragraph 147 goes on to clarify: ‘...*when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account... plans should give first consideration to land which has been previously developed and/or is well-served by public transport...*’ (emphasis added).
- 3.5 While the December 2023 NPPF clearly places a high bar for the review and amendment of Green Belt boundaries, in our opinion, this does not absolve the Council from considering whether exceptional circumstances exist in enable housing needs to be met.
- 3.6 From review of the evidence base supporting this Regulation 19 consultation plan we have not been able to find any evidence indicating that the Council has meaningfully considered whether meeting more of the Borough’s affordable housing needs (past acute delivery shortfalls and/or forward-looking need) comprises potential *exceptional circumstances* justifying Green Belt release.
- 3.7 This is perhaps not surprising given the Council’s latest published LHNA (2024) concludes there is not a need to consider an up lift: and the emerging draft plan considers that the consequent housing needs (in terms of overall housing need against the current minimum housing target) can be met elsewhere.

- 3.8 However, as indicated in these representations this assumption is based upon an unsound plan period. Therefore, the Council should and will need to consider whether exceptional circumstances may be present to support making amendments to the Green Belt to meet housing, and specifically more of the Borough's affordable housing, needs.
- 3.9 Whilst exceptional circumstances are intentionally not defined, there is case law which provides a framework for the consideration of what may be *exceptional circumstances* ('EC') justifying Green Belt release. In particular, the judgement in Calverton⁶ considered the issue of EC and came to the view that planning judgements over EC should involve consideration of:
- i. The scale of the objectively assessed need
 - ii. Constraints on supply/availability of land (prima facie) with the potential to accommodate sustainable development
 - iii. Difficulties in achieving sustainable development without impinging on the Green Belt
 - iv. The nature and extent of the harm to the Green Belt (or the parts of it which would be lost if boundaries were reviewed) and,
 - v. The extent to which impacts on the purposes of the GB may be ameliorated or reduced to the lowest reasonably practical level.
- 3.10 In relation to these, the Borough clearly has both an acute shortfall in past delivery and a pressing future trajectory for affordable housing needs – this being clearly acknowledged in the LHNA 2024 itself. These needs are not being met through the housing target and spatial strategy of the current emerging Local Plan.
- 3.11 We consider the Council should be looking to release more land for the delivery of both affordable homes led development, and market homes led developments that will deliver additional affordable homes in accordance with the new Plan's affordable policy.
- 3.12 We strongly encourage the Council to take the opportunity that this local plan review provides to deliver a plan that will genuinely make a much needed and meaningful correction to the Borough's supply and delivery of affordable homes through the next plan period.

Exceptional Circumstances – The Land at Grove End

- 3.13 Following the approach of Calverton, as set out already the scale of the objectively assessed need for affordable housing in the Borough is acute. It is also evident through the Borough's past delivery performance for net new affordable housing since 2011/12 that the Borough's supply and availability of land with potential to accommodate meeting affordable housing needs specifically, is highly constrained. Parts i) to iii) of the Calverton approach to EC are therefore evident in the Borough.

⁶ Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin).

- 3.14 Proceeding from this point therefore leads to undertaking an assessment of the nature and extent of the harm to the Green Belt (or the parts of it which would be lost if boundaries were reviewed). And the extent to which impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practical level.
- 3.15 In this regard the Council has through the review of the local plan to date undertaken two assessments of the Borough’s Green Belt. The first published in 2017 as part of the Green Belt and Countryside Study (‘GBCS’), with the second in a subsequent Green Belt Review (‘GBR’) published in 2022.
- 3.16 In both assessments the Council has applied an assessment of the performance of identified parcels of Green Belt against the five Green Belt Purposes, which are clearly stated in paragraph 143 of the NPPF as follows:
 - a. To check the unrestricted sprawl of large built-up areas
 - b. To prevent neighbouring towns merging into one another
 - c. To assist in safeguarding the countryside from encroachment
 - d. To preserve the setting and special character of historic towns, and
 - e. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 3.17 Within the 2017 GBCS, the land at Grove End was identified within a parcel given reference G4. This parcel’s area comprised the full extent of land encircled by the highway infrastructure of the A30 (London Road), the A322, and Grove End itself.
- 3.18 The Council’s 2017 assessment concluded Parcel G4 performed as follows:

Purpose A Checking Sprawl	Purpose B Settlements Merging	Purpose C Safeguarding countryside from encroachment	Purpose D preserving setting and character of historic settlements	Overall Conclusion
None	Strong	Strong	None	Moderate/High

- 3.19 The Council published its Green Belt Review in 2022, which acknowledged that whilst the 2017 work offered a useful overview of how well non-urban land within the Borough functioned, it had been undertaken at a strategic level and omitted providing any indication on the level of harm that could arise to the wider Green Belt if land was released (this is set out in paragraph 1.10 of the GBR).
- 3.20 The 2022 GBR sought to redress the omission and undertakes a further assessment of the same extent/area of land identified as Parcel G4 in the earlier review. The parcel reference was updated to reference BG1. Parcel BG1 was assessed to perform as follows:

Purpose A Checking Sprawl	Purpose B Settlements Merging	Purpose C Safeguarding countryside from encroachment	Purpose D preserving setting and character of historic settlements	Overall Conclusion
None	Strong	Moderate	None	Moderate/High

3.21 As part of the recent Outline planning application submitted on the land at Grove End, Somerston has commissioned an analysis of the Site's performance against the Green Belt Purposes. A full copy of the analysis undertaken by LVIA Ltd is included at **Appendix 3** of these representations.

3.22 Based on the LVIA Ltd analysis, the following performance conclusions have been made:

Purpose A Checking Sprawl	Purpose B Settlements Merging	Purpose C Safeguarding countryside from encroachment	Purpose D preserving setting and character of historic settlements	Overall Conclusion
None	Moderate/Weak	Moderate/Weak	None	Moderate/Weak

3.23 The LVIA Ltd work has also analysed the spatial and visual openness performance of the land at Grove End; concluding that, as with any scheme on an undeveloped Green Belt site, a level of spatial harm will occur. There will also be change to the visual aspect of the Green Belt. However, this change will be localised and limited due to the enclosure formed by the surrounding elements of the urban fringe in which the site sits.

3.24 Overall, the LVIA Ltd analysis of the site's specific performance against the purposes of the Green Belt it that this land is in fact low performing (limited). Furthermore, although there will be reduction in spatial openness, awareness of this change will be limited to the intrinsic change within the site due to the change being physically constrained by the surrounding strongly defensible boundaries formed by the transport corridor network.

3.25 Taking these matters into consideration, it is clear the site is both within a sustainable location and provides a limited contribution to the purposes of the Green Belt. The site is capable of delivering a significant number of much needed affordable homes, which at the very minimum will be in excess of the adopted and emerging policy requirements.

3.26 Moreover, the removal of the land at Grove End from within the Green Belt would represent a total reduction of just 0.019% of the Borough's current designated Green Belt land.

3.27 Taking these matters into consideration, in our opinion, parts four and five of the Calverton approach to exceptional circumstances can be evidenced and demonstrated.

3.28 The site offers a well-placed opportunity to be removed from the Green Belt and allocated for residential development to assist in meeting the Council's need for housing in general, and specifically to meet more of the acute affordable housing needs during the new plan period.

Summary

- 3.29 For the reasons set out in this section, Somerston considers that the proposed Housing Requirement fails to sufficiently address several matters, with respect to: the apportionment of unmet need to Hart District and the Duty-to-Cooperate; the need to re-base and extend the emerging Local Plan period; and the need to explore further growth potential within the Borough's existing Green Belt designated area to accommodate more of the Borough's acute affordable housing needs.
- 3.30 Somerston considers that the Regulation 19 ELP, as currently formulated, is fundamentally **unsound**. The approach is patently *inconsistent with national policy*, it is *not positively prepared*, it is *not justified*, and it is *not effective*.
- 3.31 In resolving these matters, Somerston advocates the allocation of the Land at Grove End, Bagshot, as a sustainably located site capable of accommodating additional, much needed, affordable homes.

4. SPATIAL STRATEGY

- 4.1 Further to our concerns in relation to establishing the Housing Requirement, there are several clear omissions and deficiencies with the corresponding proposed Spatial Strategy as currently formulated.
- 4.2 These issues are set out below and must be addressed to ensure that the draft Local Plan is *positively prepared, effective, justified, and consistent with national policy*. If these issues are not addressed, Somerston considers that the draft Local Plan is **unsound**.

Achieving Sustainable Development

- 4.3 Somerston recognises the Council's intentions with respect to directing development toward the defined settlement areas to the West of the Borough, '*...to optimise delivery in the most sustainable and accessible areas*'.
- 4.4 Within the Western Urban Area of the Borough, Camberley Town Centre is considered the principal focus for development, with Bagshot, Frimley, Frimley Green, Mytchett, and Deepcut impliedly comprising the next preferable tier of settlement to accommodate development given the sustainable nature of the settlements.
- 4.5 One fundamental flaw with the proposed spatial strategy is that it currently does not explicitly provide that development will be directed to locations in and adjoining the most sustainable settlements, in sequential order of preference, as defined in a Settlement Hierarchy.
- 4.6 As currently formulated, proposed Policy SS1 fails to appropriately take account of the need to direct development toward the higher-order settlements in order of sequential preference; i.e., that development should be directed toward the Tier 1 Settlements, before consideration is given to the direction of development at the respective lower-tier settlements, such as Tier 2 Settlements, before Tier 3 Settlements, and so forth.
- 4.7 The direction of development toward the most sustainable settlements is a central doctrine in the achievement of sustainable development, as indeed is recognised in the draft Local Plan. The location of a greater proportion of development at the Borough's highest tier settlements is clearly a foundational component of an approach that is capable of achieving '*sustainable development*'.
- 4.8 Contributing to the achievement of sustainable development is, as set out in the NPPF (December 2023) at paragraph 7, the purpose of the planning system, and is therefore necessary to be *consistent with national policy*.
- 4.9 Notwithstanding the Green Belt designation, as a matter of principle, to overlook the allocation of otherwise *suitable* sites for development at the Borough's higher-order settlements, such as Bagshot, given the proximity of land that is adjacent to the settlement to the services, amenities, and facilities within the Western Urban Area, is a critical miss-step, and points to a fundamental weakness within the proposed spatial strategy as currently formulated.

- 4.10 In the achievement of sustainable development, it cannot be prudent to omit the allocation of *suitable* sites located at the Borough's higher-order settlements whilst relying upon less sustainably located sites in lower tiers of the Settlement Hierarchy. In our view, sites in these locations, whether greenfield or brownfield, Green Belt or otherwise, are unequivocally less sustainably located and are likely to lead to greater traffic generation.
- 4.11 Consequently, Somerston considers that the proposed spatial strategy fundamentally does not and cannot represent an approach that is *sound*, and must be amended to make it clear that development will be directed to the most sustainable settlements across the Borough in order of their sequential sustainability. In its current form, the spatial strategy inappropriately excludes otherwise *suitable*, sustainably located sites due to their Green Belt designation, in favour of supporting allocations for residential development in less sustainable locations.
- 4.12 In this context, Somerston recommends the allocation of the Land at Grove End, Bagshot ('the site') for a residential-led, sustainable extension of Bagshot. Somerston advocates that the site is well-placed to assist the Borough in delivering its housing needs in a highly sustainable location which does not contribute strongly to the purposes of the Green Belt. The multifaceted and significant benefits of the site are set out in detail within Section 3 of these representations.

Over-Reliance on Large-Scale, Brownfield Development

- 4.13 Policy SS1: Spatial Strategy identifies that over the 2019 – 2038 plan period, provision is made for the delivery of some 5,578 new homes in the Borough. Within the Council's proposed spatial strategy, there is a clear reliance upon large-scale, brownfield development sites to deliver the Borough's housing needs.
- 4.14 Several issues arise from this proposition, namely; an over-reliance on flatted development that does not provide for family housing, limited contributions toward affordable housing delivery, and exposure to lengthy lead-in periods that typically delay housing delivery well beyond projected rates. These issues are discussed below in turn.

Lack of Provision for Family Housing in Western Urban Area

- 4.15 The Council's Local Housing Need Assessment ('LHNA') (2024) identifies an appropriate target housing mix for development within the Borough up to 2038, which comprises a range of 1-bedroom to 4+-bedroom homes. The Council's evidence indicates that Market provision should comprise predominantly 2-bedroom to 4+-bedroom homes, whilst affordable housing provision should focus on 1-bedroom to 3-bedroom homes.
- 4.16 However, the Council's Spatial Strategy is focused on the provision of '*high-density*' flatted development within Camberley, which clearly conflicts with the identified housing needs. Of the 5,578 total new homes projected for delivery within the Borough between 2019 – 2038, approximately 2,178 are set to be delivered within Camberley. This represents some 39% of the Borough's entire provision of new housing up to 2038.

- 4.17 Of these, at least +1,548 new homes are directed to Camberley Town Centre, focused on two large ‘*high density*’ allocations at the London Road Block and Land East of Knoll Road. Clearly, a majority of these new homes will comprise flats, with both Policies HA2 and HA3 specifically identifying this to be the case.
- 4.18 A further +170 dwellings are allocated at the Sir William Siemens Square site in Frimley. Planning permission has been approved at the site under reference 24/0116/FFU, which includes the provision of +104 flats and +66 houses. It is likely that other developments within the Borough will also include some level of flatted or maisonette provision too.
- 4.19 As set out in the Council’s LHNA (2024), such flatted developments typically comprise a significant number of 1-bed and 2-bed flats. Table 8.16 in the LHNA shows that just 3% of all 3-bed homes in Surrey Heath are flats, for example.
- 4.20 In this regard, the Spatial Strategy’s focus on large-scale flatted development conflicts with the Council’s evidence need for housing in the Borough. The LHNA (2024) is clear that some 60% of new market housing should comprise either 3-bed or 4+-bedroom homes, which is unachievable within these Town Centre sites given the reliance on flats.
- 4.21 The skewed delivery of housing is compounded by the reduced requirement for affordable housing provision at the two Council-owned, large-scale, town-centre site allocations. Given that some 80% of the homes at London Road Block, and 75% of homes at Land East of Knoll Road will be market housing, there will be a substantial number of 1-bed and 2-bed flats delivered as market tenures, whereas the Council’s evidence identifies a need for Market housing of just 5% 1-bedroom accommodation, and 35% 2-bedroom accommodation.
- 4.22 In this regard, whilst the Council’s proposed Spatial Strategy may meet the minimum number of homes required over the ELP’s current plan period (as derived via the current Standard Method), there is a clear disregard for meeting the needs of families with children and other community groups as part of this overall housing provision.
- 4.23 The NPPF (2023) at paragraph 60, states that ‘...*it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed...*’.
- 4.24 In this context, paragraph 63 is clear that ‘...*Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing, families with children...*’ (emphasis added).
- 4.25 Rather than assess the extent to which the proposed spatial strategy is capable of meeting different housing needs, the Council has simply sought to provide enough housing overall to meet Local Housing Needs. In this regard, we consider that the spatial strategy is **not positively prepared, or justified**.

Lack of Affordable Housing Provision

- 4.26 As detailed previously, the Council's proposed spatial strategy is incapable of meeting identified affordable housing needs over the proposed plan period. However, for the purposes of this discussion specifically, it is pertinent that the over-reliance on large-scale brownfield development sites has clearly limited the Borough's ability to meet these affordable housing needs, this is shown clearly in Table 2.1 earlier in this representation.
- 4.27 Policy H7: Affordable Housing sets a requirement for 40% of all housing delivered within Surrey Heath (on sites of 10 or more dwellings) to be provided as affordable tenures, subject to several caveats. This requirement is in place to assist in securing the 250 affordable dwellings per annum that are assessed as being needed within the LHNA (2024).
- 4.28 However, Site Allocations HA2, HA3, and HA4, provide bespoke reduced affordable housing requirements at just 20%, 25%, and 15% respectively, to provide for the viability of their development, reflecting the status of the sites as brownfield redevelopment opportunities with the associated additional costs of decommissioning and demolishing the existing structures.
- 4.29 Furthermore, there is a general reduced requirement for just 25% affordable housing provision within Camberley Town Centre, where almost one third of the Council's entire housing provision is allocated up to 2038, likely reflecting the same context in relation to viability.
- 4.30 The Council's Spatial Strategy has no intention of meeting affordable housing needs, for reasons that we will set out later in these representations, and is clearly not capable of doing so in its current formulation given the over-reliance on brownfield development with reduced provision requirements. In this regard, we consider that the spatial strategy is **not positively prepared, or justified**.

Exposure to Delays in Delivery

- 4.31 Furthermore, Somerston considers that the Council's over-reliance upon large-scale, brownfield redevelopment sites in its proposed Spatial Strategy leaves the Borough exposed to likely delays in housing delivery, as indicated within the Council's rolling housing land supply evidence.
- 4.32 Lichfields' Start to Finish (3rd edn.) research (see **Appendix 4**) provides the principal industry-based research into the factors which affect housing delivery. The research paper indicates that several issues arise from reliance upon large-scale, brownfield development sites.
- 4.33 Firstly, the research indicates lead-in times for development proposals comprising greater than 500 units are likely to be considerably lengthier than those for proposals below the 500-unit threshold. Average lead-in times for sites above the threshold were 4.3-years, whereas for smaller sites the average was just 2-years.
- 4.34 Furthermore, the same research indicates that actual build-out rates were considerably lower on brownfield development sites than their greenfield counterparts. Indeed, the delivery rate for homes on greenfield sites is some 34% higher on average.

- 4.35 Whilst the Council has not published detailed site-by-site housing delivery trajectory throughout the plan period in full, Appendix 6 of the Council's Strategic Land Availability Assessment ('SLAA') (2023) provides a trajectory to the larger constituent sites of the projected supply.
- 4.36 Subject to initial review, there are some clear instances where over-optimistic assumptions have been applied in relation to delivery on a number of sites. For example;
- i. Land East of Knoll Road - it is unclear how the site could reasonably be expected to start delivering homes in 2028/29, just four years from now. The site is currently occupied with offices, wherein the Council and other tenants remain in operation. There has been no planning application submitted for the site, which would require significant demolition activity before construction could even commence.

The projected phasing of this site should be pushed back a number of years to reflect this situation.
 - ii. London Road Block – it is unclear how the Council expects the full 524 dwellings to be delivered by 2038. Evidence in Lichfields' Start to Finish (3rd edn.) research indicates that the lower quartile to upper quartile range of housing delivery on sites between 500 – 999 was between 44 – 83 dpa. Delivery of 105 dwellings per annum, on a brownfield site (which typically face lower delivery rates as set out previously) therefore appears overly optimistic.

The projected phasing of this site should be revised significantly downwards to reflect average build-out rates for sites of this size, closer to the region of 60dpa.
- 4.37 Notwithstanding the information set out in Appendix 6 of the SLAA (2023), the Council has not published a detailed site-by-site housing delivery trajectory in full covering the plan period. In consequence, we have been unable to duly review the assumptions that have been made with respect to the delivery rate of each site. This information must be provided as part of the Examination such that the projected housing delivery rate and lead-in time for each site, and the assumptions supporting those rates, can be duly scrutinised and robustly tested.
- 4.38 It is clear from the Rolling Five-Year Housing Land Supply table provided at Appendix 2 of the Council's 'Housing Topic Paper 2024' that the Council will, in its presented best-case scenario, already be unable to demonstrate a sufficient rolling housing land supply position after the 2028/29 period through to the end of the plan period.
- 4.39 Delays to the projected delivery of the large-scale brownfield redevelopment sites in the Town Centre would further expose the Council to being unable to demonstrate a sufficient housing land supply position throughout the plan period.
- 4.40 As indicated already, large-scale, brownfield sites are typically exposed to lengthy lead-in periods and reduced build-out rates. This has been evident in the lengthy redevelopment programme of the former Mindenhurst Barracks at Deepcut, which remains ongoing despite having secured Hybrid planning permission (under reference: 12/0546) in April 2014, some 10 years ago.

- 4.41 Indeed, Lichfields' Start to Finish (3rd edn.) research indicates that it is typical for these larger schemes to be subject to considerable periods of time 'optimising' a planning permission once the 'original' consent is granted. Our view is that this is likely to be the case for the large-scale redevelopment sites proposed for Camberley Town Centre and could well lead to significant delays to the Council's projected delivery rates.
- 4.42 Given the likeliness of delays in relation to these sites, the Council's housing trajectory is likely to be pushed back beyond the end of the plan period. This would mean that a significant amount of the projected housing over the period would not be delivered, and that other alternative sites must be allocated in order for the Council to meet its housing requirement up to 2038.

Summary

- 4.43 For the reasons set out above, Somerston considers that the proposed Spatial Strategy fails to sufficiently address several matters, with respect to: achieving sustainable development, the provision of sufficient family housing and affordable housing: and, exposing the Borough to not meeting its housing requirement over the plan period due to its focus on housing delivery on large-scale brownfield redevelopment sites in Camberley Town Centre.
- 4.44 Somerston therefore considers that the proposed Spatial Strategy, as currently formulated, is fundamentally ***unsound***, the approach is *inconsistent with national policy*, it is *not positively prepared*, it is *not justified*, and it is *not effective*. To resolve the flaws with the current approach, Somerston contends that the Council must identify additional, sustainably located greenfield sites that are capable of delivering family housing and affordable housing within the short to medium term of the plan period.
- 4.45 In this respect, Somerson is continuing to promote the Land at Grove End, Bagshot for the development of up to 135 homes, of which a minimum 50% (68 actual) will be affordable. It is pertinent that the intention is to see delivery of all 135 homes as affordable housing, incorporating a mix of homes to support families with children in the Borough.
- 4.46 The site is adjacent to Bagshot and is sustainably located at the Borough's higher-order Western Urban Area – as defined by the ELP. An Outline application proposing the site's development has already been made and planning permission was refused by the Council. This decision is now the subject of an appeal. Upon the grant of a planning permission the site could be delivered within the short to medium term – with an affordable housing provider/developer secured to deliver the development.

5. CONSULTATION ON CHANGES TO THE NPPF

- 5.1 The Ministry of Housing, Communities and Local Government ('MHCLG') published proposed changes to the NPPF on 30 July 2024, which are intended to implement the Government's manifesto commitments to increase housing supply. The proposed changes to the NPPF are subject to consultation that runs to 24th September 2024.
- 5.2 Whilst the consultation is on proposed changes at this stage, the revisions include significant changes that are likely to be pertinent to Surrey Heath in the immediate future. In summary, these include revisions to the Standard Method of calculating housing need, the concept of 'Grey Belt', and reiterating the need for Local Authorities to review Green Belt boundaries to meet assessed housing needs.
- 5.3 For the purposes of plan-making, the proposed amended Paragraph 226 is clear that the policies in the new NPPF (once published) would apply from the publication date plus one month, unless (*inter alia*) an emerging local plan is submitted for examination under Regulation 22 on or before the publication date plus one month.
- 5.4 In this context, we are concerned that the Council has made a political choice to rush through the plan-making process, with the intention of submitting the plan for Examination under Regulation 22 in advance of the publication of the new NPPF. Our concern is that this is being undertaken to avoid the need to plan for the revised Standard Method figure which, as set out previously, is significantly higher than the Housing Requirement set out in the emerging plan.
- 5.5 In this context, Paragraph 227 of the NPPF Consultation Document is clear that;
- 'Where paragraph 226 c) applies, local plans that reach adoption with an annual housing requirement that is more than 200 dwellings lower than the relevant published Local Housing Need figure⁸⁶ will be expected to commence plan-making in the new plan-making system at the earliest opportunity to address the shortfall in housing need'.*
- 5.6 The proposed Housing Requirement in the emerging Local Plan is approximately just 294 dpa (5,578 total, over the 19-year plan period). This is significantly lower than the Borough's proposed new Standard Method figure of 658 dpa. In this context, the Council will be in a position of having to recommence plan-making immediately upon adoption of this emerging plan.
- 5.7 Our view is that the Council's current approach is not *positively prepared*, nor *effective* or *justified* on its own terms, in its current formulation. However, in the context of the Government's proposed amendments to the NPPF, the Council's approach is considered to be even further from meeting these tests of *soundness*.
- 5.8 In her letter to all Local Authority Leaders and Chief Executives in England, dated 30 July 2024 (see **Appendix 5**), the Deputy Prime Minister and Secretary of State ('SoS') for Housing, Communities and Local Government detailed the Government's clear sense of direction in implementing the proposed amendments to the NPPF in order to '*...build the homes this country so desperately needs...*':

‘As the Leaders and Chief Executives of England’s local authorities, you know how dire the situation has become and the depth of the housing crisis in which we find ourselves as a nation. You see it as you place record numbers of homeless children in temporary accommodation; as you grapple with waiting lists for social housing getting longer and longer; and as your younger residents are priced out of home ownership.

It is because of this I know that, like every member of the Government, you will feel not just a professional responsibility but a moral obligation to see more homes built. To take the tough choices necessary to fix the foundations of our housing system. And we will only succeed in this shared mission if we work together – because it falls to you and your authorities not only to plan for the houses we need, but also to deliver the affordable and social housing that can provide working families with a route to a secure home’ (emphasis added).

- 5.9 The overarching ethos behind the Government’s proposed changes to the NPPF is clear. It is in this context that our concern the Council’s proposed Spatial Strategy, insofar as it so obviously fails to meet assessed affordable housing needs, is **not positively prepared**. In our view, the Council should explore opportunities for further growth to meet these needs via the allocation of additional sustainably located sites in the Borough. Indeed, it has a moral obligation to do so.
- 5.10 In her letter, the SoS is clear that Councils ‘...will be expected to make every effort to allocate land in line with their housing need as per the standard method...’, and where relevant will be ‘...required to review boundaries and release Green Belt land where necessary to meet unmet housing or commercial need’ (emphasis added).
- 5.11 Our view is that the Council should seek to future-proof this emerging Local Plan by taking the opportunity to do this now, in advance of a requirement to do so immediately following the adoption of this emerging plan. Doing so would assist in ‘...making sure that the right kind of homes are delivered through our planning system as quickly as possible’.
- 5.12 The SoS published a Written Ministerial Statement (‘WMS’) on 30 July 2024 alongside the letter to Councils. In the WMS, the SoS is clear that the proposed amendments to the NPPF represent a clear and purposeful direction of travel, toward ensuring that there are a sufficient number of homes being built, and that they are being delivered in sustainable locations.
- 5.13 In this context, notwithstanding its current status as a consultation document, it is clear that the NPPF is set to be updated meaningfully and purposefully to achieve these aims. And that such amendments represent the ‘*First Step of a Bigger Plan*’ to bring forth the ‘...decade of renewal that the country so desperately needs’. As the Secretary of State declares; ‘There is no time to waste. It is time to get on with building 1.5 million homes’ (emphasis added).
- 5.14 Somerston firmly advocates, and have demonstrated, the Land at Grove End, Bagshot is capable of assisting in delivering the desperately needed affordable homes in a sustainable and suitable location. The emerging Local Plan should consider allocating the site

accordingly to assist in meeting assessed general and affordable housing needs. Rather than awaiting for the next plan review.

Review Mechanism

- 5.15 Should the Council submit the emerging Local Plan under Regulation 22 in its current form, an appropriate modification should be made to incentivise and facilitate an immediate review of the plan, such that the Council is able to take account of the proposed changes to the NPPF in an effective manner.
- 5.16 Our view is that a ‘review mechanism’ should be introduced into policy, which sets out clear dates for the preparation and completion of a new local plan, and the consequences should those timescales not be met. Bedford Borough Council’s Local Plan 2030 provides an example of such a review mechanism, which Somerston would advocate is replicated within the Surrey Heath Local Plan.
- 5.17 In the Bedford Local Plan 2030 example, ‘Policy 1 – Reviewing the Local Plan 2030’ provides that:

‘The Council will undertake a review of the Local Plan 2030, which will commence no later than one year after the adoption of the plan. An updated or replacement plan will be submitted for examination no later than three years after the date of adoption of the plan. In the event that this submission date is not adhered to, the policies in the Local Plan 2030 which are most important for determining planning applications for new dwellings will be deemed to be ‘out of date’ in accordance with paragraph 11 d) of the National Planning Policy Framework 2019’.

- 5.18 This example review policy was included within the Bedford Local Plan 2030 due to similar circumstances, wherein the NPPF (2019) was adopted during the plan-making process, which introduced the Standard Method. The Surrey Heath Local Plan should be amended to introduce a similar review mechanism to ensure the new NPPF, and the updated standard method, is taken into account swiftly.

Introduction of ‘Grey Belt’ Concept

- 5.19 In the proposed amendments to the NPPF (July 2024), the Government introduced the concept of ‘Grey Belt’, alongside several amendments to Green Belt policy, which are intended to facilitate a significant boost to housing supply (and notably affordable housing supply) in the immediate term.
- 5.20 The concept of ‘**Grey Belt**’, as defined in the amended Annex 2: Glossary, comprises:

‘For the purposes of plan-making and decision-making, ‘grey belt’ is defined as land in the green belt comprising Previously Developed Land and any other parcels and/or areas of Green Belt land that make a limited contribution to the five Green Belt purposes (as defined in para 140 of this Framework), but excluding those areas or assets of particular importance listed in footnote 7 of this Framework (other than land designated as Green Belt)’.

- 5.21 In addition, a new Paragraph 152 is proposed, which clarifies that development in the Green Belt should not be regarded as inappropriate where certain criteria are met. These comprise situations in which an Authority cannot demonstrate a 5-year housing land supply, and where the development would meet further requirements set out in Paragraph 155 and would not fundamentally undermine the function of the Green Belt across the area of the plan as a whole.
- 5.22 The purpose of introducing the 'Grey Belt' concept is to support a consistent and transparent approach toward identifying land for development, by providing a set of clear criteria for assessing whether land makes a limited contribution to the Green Belt's five purposes.
- 5.23 As part of the Government's consultation, it is proposed to include further clarification to the NPPF Glossary to set out that:
- a. *'Not strongly perform against any Green Belt purpose; and*
 - b. *Have at least one of the following features:*
 - i. *Land containing substantial built development or which is fully enclosed by built form*
 - ii. *Land which makes no or very little contribution to preventing neighbouring towns from merging into one another*
 - iii. *Land which is dominated by urban land uses, including physical developments*
 - iv. *Land which contributes little to preserving the setting and special character of historic towns'.*
- 5.24 The proposed new Paragraph 155 elaborates that where development is released from the Green Belt, certain criteria should apply; including at least 50% affordable housing provision, necessary improvements to infrastructure, and the provision of new (or improvements to existing) green spaces are provided.
- 5.25 Given the Government's proposed introduction of the 'Grey Belt' concept, it would follow that in the Plan-making context, those sites qualifying under the specified criteria would be sequentially preferable for allocation than those that do not. This would follow established methodologies for Green Belt assessment and release, which already prioritise the release of sustainably located sites that do not perform well against the Green Belt purposes.
- 5.26 We consider that the proposed development at Land at Grove End, Bagshot meets these criteria and would therefore not be considered to comprise inappropriate development in the Green Belt under the draft revised NPPF.
- 5.27 Noting the clear direction of travel communicated by the Government, Somerston encourages the Council should already be actively seeking to amend the choices made regarding Green Belt release through the local plan review to date: to allocate appropriate additional sites to ensure the emerging plan is *positively prepared* and seeking to genuinely boost housing supply to meet the Borough's needs.

6. LAND AT GROVE END, BAGSHOT

Site Characteristics and Context

- 6.1 Land at Grove End, Bagshot ('the site') is located to the north-east of Bagshot, within Surrey Heath Borough. The site is accessible to a wide range of services and social amenities which are available within Bagshot town centre. Bagshot railway station, situated approximately 400 metres from the site, connects the village with other regional centres; including Ascot, Aldershot, London, etc.
- 6.2 The 4.3ha site is located within the designated Green Belt; however, it makes only a limited contribution to the Green Belt purposes. There are existing residential properties to the immediate north, beyond which there is the Hall Grove Farm Industrial Park, and the Hall Grove School.
- 6.3 To the immediate south, on the opposite side of Grove End, is the Windlesham Golf Club and course. To the west, the site is adjacent to a belt of existing mature trees and lower-level vegetation. Beyond these is the main line railway, the main A322 road, and the existing edge of Bagshot's urban area.
- 6.4 The site benefits from excellent vehicular access, with Grove End road linking to the A322 southbound at the south west site corner, providing access to junction 3 of the M3 some 1km south. These provides onward links to Farnborough, Basingstoke, Winchester and Southampton travelling southbound. As well as junction 12 of the M25 and London travelling northbound.
- 6.5 Grove End also links onto the A30 (London Road) approximately 100m north-east of the site providing access to London, Heathrow Airport and Junction 13 of the M25 to the east; as well as Bagshot and Camberley to the west. Bracknell and Junction 10 of the M4 can be accessed via the A322 to the north.
- 6.6 The site does not contain or border any heritage assets, nor any nationally and locally designated sites. With respect to landscape, the site is located outside and not within proximity to any Areas of National Landscape ('AoNL') or other areas of designated (statutory or local) landscape importance. There are no Public Rights of Way ('PRoW') within the site.
- 6.7 The site itself is not subject to any Tree Preservation Orders (TPO), nor are there any veteran trees on site. The site is not part of any Site of Special Scientific Interest (SSSI) or Air Quality Management Areas (AQMA). In terms of flood risk, the site lies fully within Flood Zone 1 for fluvial risk.

The Proposal

- 6.8 Somerston submitted an Outline Planning Application (reference: 23/1163/OOU) for residential development in November 2023. The application was refused by the Council in May 2024. The Planning Application sought:

‘Development of up to 135 homes, including a minimum 50% affordable homes, with associated landscaping, parking, open space, play areas, etc.: the construction of a new vehicular access on to Grove End serving the development of up to 135 dwellings: reconfiguration of the existing vehicular access serving the Windlesham Golf Club: and all other associated development works (Access only detailed matter with all other matters reserved)’.

- 6.9 The application was refused in May 2024. The principle reasons for refusal related to harm to the Green Belt and harm to rural character. Three further reasons were cited relating to matters otherwise resolvable through agreement of an appropriate legal agreement.
- 6.10 An appeal against the Council’s refusal has been submitted.
- 6.11 Notwithstanding the refusal of the outline application, it has been clearly demonstrated the site is in a sustainable location and presents an opportunity to deliver significant benefits to the local area. There are no overriding physical or environmental constraints that would prevent the site from being delivered.
- 6.12 No objections to the submitted application’s scheme proposal or its sustainability credentials have been raised by the Council through the determination of the outline application (albeit noting one of the refusal reasons noted the failure to secure an appropriate contribution for a Demand Response Transport bus service – this has contribution has been formally accepted by Somerston).

Sustainability Assessment

- 6.13 Land at Grove End, Bagshot is identified within the Council’s Strategic Land Availability Assessment (‘SLAA’) (2023) under Site Reference ID 736. Appendix 3 of the SLAA indicates that the site has been discounted from consideration ‘...due to [its] *Green Belt designation*’. There are no other reasons identified by the Council that mean the site would not be considered suitable for residential development.
- 6.14 The Council further considered the site within its Interim Sustainability Appraisal (‘ISA’) (2022), again under Site Reference ID 736. In the ISA, the site comprises one of the constituent components of Growth Scenario 2. However, it is ultimately not carried forward for allocation due to the site’s location within the Green Belt and the Council’s preferred Spatial Strategy comprising Growth Scenario 1 (Constant Supply Components).
- 6.15 Notwithstanding the conclusion, it is noted that the site is assessed favourably in relation to the ISA’s Sustainability Metric, as set out within Appendix V: Site Options GIS Analysis. Compared with other sites, Land at Grove End performs more favourably overall against the 23 metrics against which the sustainability of sites is measured.

- 6.16 Indeed, compared with another site at Bagshot which is proposed for allocation (Bagshot Highways Depot), the Land at Grove End is overall assessed to be more sustainable. However, it is discounted from allocation on the basis of its location within the Green Belt. We consider it likely that the site also scores more favourably than a number of other allocated sites elsewhere in the Borough.
- 6.17 The assessment of site sustainability set out within the ISA (2022) is carried forward and relied upon within the Council's Sustainability Appraisal ('SA') (2024) which comprises one of the core evidence-base documents supporting the Regulation 19 iteration of the DLP.

Summary

- 6.18 The site is *available* for development now, is *suitable* for residential development in a sustainable location, and is *achievable* for development in the early part of the plan period. The site is therefore *deliverable*, and we recommend that the ELP revisit its current chosen approach to not release site's in the Green Belt. This would enable appropriate allocations, such as the Land at Grove End, to be introduced to the emerging Local Plan to assist in bringing forward this site for much needed new affordable homes in the near future.

7. COMMENTS ON OTHER POLICIES

- 7.1 This section sets out Somerston’s comments in relation to other policies included within the emerging Local Plan.
- 7.2 As a general principle, Somerston considers that locally set standards should not be imposed where national standards for compliance already exist. Locally set standards have the potential to impact upon viability, delivery of housing and given the long-term nature of the local plan, could very quickly become outdated and superseded by national guidance.

Policy E3: Biodiversity Net Gain

- 7.3 Somerston considers the requirement for new development to deliver a 20% net gain for Biodiversity to be *ineffective*, and *unjustified*.
- 7.4 Somerston fully supports the aims of Biodiversity Net Gain (‘BNG’) in principle. In this regard, Somerston supports the national mandatory 10% BNG requirement and where possible seeks to deliver BNG in excess of this on-site, subject to viability.
- 7.5 However, the emerging Local Plan should not include a requirement for BNG of greater than 10%. Both in isolation, and particularly in combination with the collection of other policy requirements set out within the emerging plan, the additional BNG requirement is capable of giving rise to significant viability constraints, depending on the specific context of a site.
- 7.6 The likely impact of an elevated BNG requirement is a reduction in the available developable area of sites allocated for development (and windfall sites), and a corresponding reduction in development viability. Off-site provision is also likely to result in development viability trade-offs, given the significant cost of off-site Biodiversity Credits (currently in the region of £30,000 - £50,000 per credit).
- 7.7 By introducing the additional BNG requirement, the Council is likely therefore to generate a position wherein trade-offs would need to be made between achieving these percentage gains against achieving other targets, such as the provision of affordable housing and infrastructure.
- 7.8 Given the Council is already projected to face a significant shortfall in affordable housing provision over the plan period, it would seem prudent to avoid introducing further additional policy requirements which may well reduce provision further.
- 7.9 Furthermore, the necessary loss of developable area to accommodate an additional 10% BNG on-site will increase pressure to identify a greater number of development sites to deliver the same number of market and affordable homes, and associated infrastructure, in turn increasing development pressure across the Borough.

- 7.10 It is not clear whether the Council has taken the increased 20% BNG requirement into consideration when deriving estimates of site capacity. Our experience is that development proposals are increasingly looking to utilise some 50-60% of the total site area for development, given the current requirement for a minimum of 10% Biodiversity Net Gain. An elevated requirement may impact the ‘net’ developable area further, meaning that the Council may have overestimated the development capacity on some sites accordingly.
- 7.11 In order to avoid these issues, Somerston recommends that the Council instead seeks to outline that support, rightly, would be given to proposals that do exceed the 10% BNG national mandatory requirement. The draft policy is not considered to be *effective* in its current form.
- 7.12 Planning Practice Guidance, published on the 14 February 2024, states that:
- ‘... plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified. To justify such policies, they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development. Consideration will also need to be given to how the policy will be implemented’⁷.*
- 7.13 The baseline position set out in PPG is that plan-makers should not seek to introduce an increased biodiversity net gain requirement. Where a plan seeks to do so, it should be based on robust evidence of a *local need* for a higher percentage, *local opportunities* for a higher percentage, and a detailed assessment of the actual impacts on development viability.
- 7.14 Whilst Somerston recognises the significant loss of biodiversity across the UK across recent decades, and the importance of tackling this holistically, there is limited evidence to suggest the situation in Surrey Heath is significantly worse than at the national level. The Council’s evidence notes that some 11.5% of species in Surrey are classified as threatened, which appears to be reasonably similar to the situation across England as a whole which is set out in the national *State of Nature* reporting.
- 7.15 In this regard, Somerston considers the elevated requirement of 20% BNG to be *unjustified*. To redress the issues set out above, the Policy could reasonably be amended to provide support to proposals which are capable of demonstrating a greater gain beyond the national mandatory 10% requirement.

⁷ PPG (2024) ‘Biodiversity Net Gain’. Paragraph: 006, Reference ID: 74-006-20240214.

Policy DH8 – Building Emissions Standards

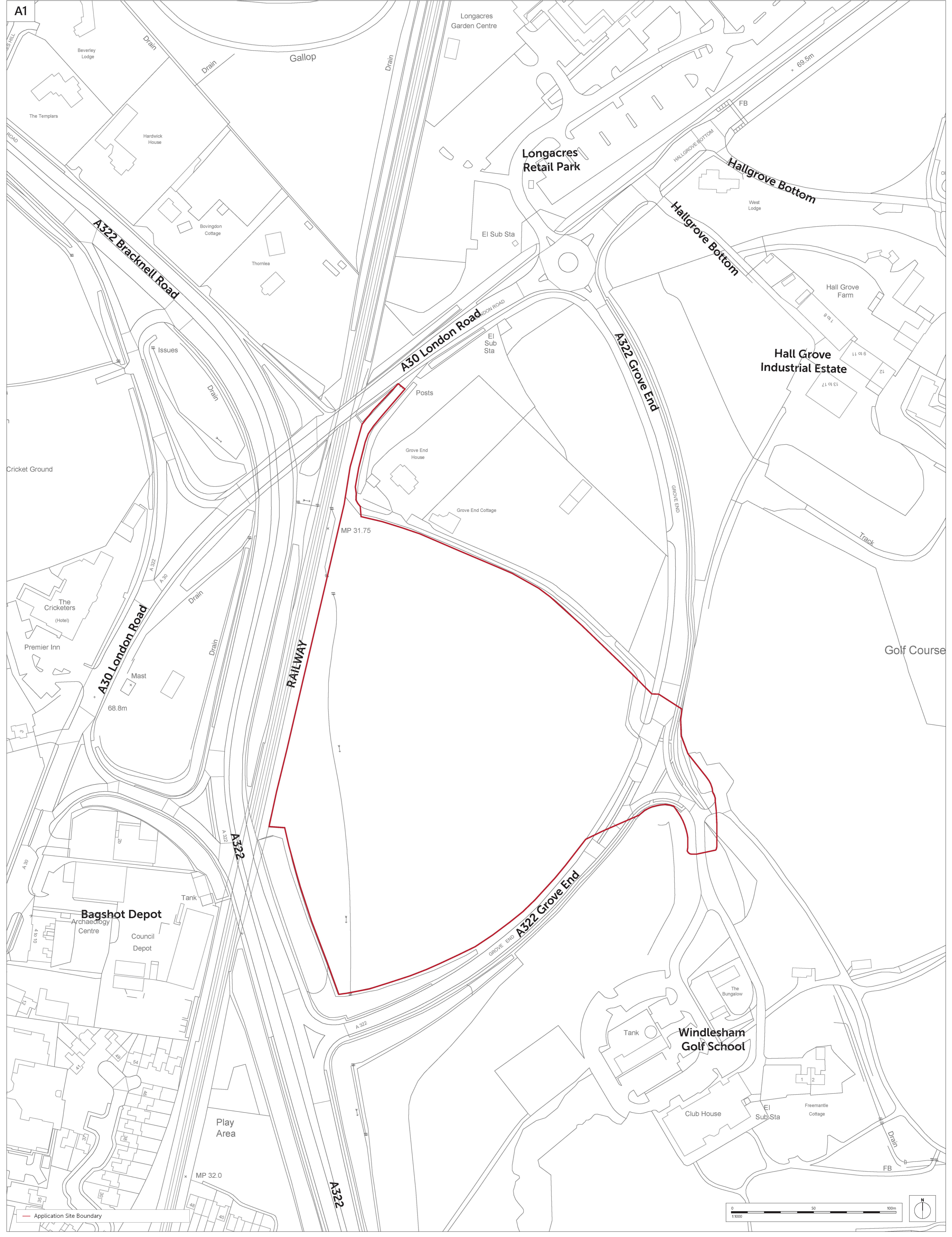
- 7.16 Somerston recognises the need for new homes to be more energy efficient. In this regard, Somerston notes the Government's phased approach to seeking reductions in Building Emissions that will see the Future Homes Standard ('FHS') being implemented with all new homes being zero carbon ready from 2025.
- 7.17 Once the national grid has been effectively decarbonised, this means that these will become 'zero carbon ready' homes. Consequently, all new homes will already positively contribute to addressing climate change simply by complying with building regulations. Part 1 of Policy DH8 therefore becomes superfluous and should be deleted accordingly.

8. CONCLUSION

- 8.1 Boyer has prepared these representations on behalf of Somerston Developments Ltd ('Somerston'), in response to Surrey Heath Borough Council's 'Regulation 19' Consultation on the emerging Pre-Submission Surrey Heath Local Plan (2019-2038).
- 8.2 The purpose of these representations has been to assist Surrey Heath Borough Council in formulating an approach within the emerging Local Plan that is both consistent with national planning policy and the tests of soundness. In this regard, our representations relate to the tests of soundness set out at paragraph 35 of the NPPF (December 2023); namely, whether the emerging draft plan is: *Positively prepared; Justified; Effective; and Consistent with national policy*.
- 8.3 Somerston considers that, in its current form, the Regulation 19 Pre-Submission Draft Local Plan represents an approach that is **unsound**. The approach currently being undertaken with regard to the Housing Requirement, and the associated Spatial Strategy, is **not consistent with national policy, effective, justified, and positively prepared**.
- 8.4 These representations have set out our recommendations to assist the Council in achieving an approach that is capable of being found *sound* as the emerging plan progresses toward examination.
- 8.5 Such an approach would comprise increasing the Housing Requirement to ensure the plan is *consistent with national policy*, and revising the corresponding spatial strategy to deliver a pragmatic approach toward Green Belt release that enables appropriate allocations to be introduced to the DLP to assist in meeting the Borough's significant housing (and specifically more of its affordable housing) needs.
- 8.6 In summary, the proposed Housing Requirement is **unsound**. The Housing Requirement: does not reflect an appropriate plan period (which must be re-based to 2024/25 and extended to 2040/41); it inappropriately discounts and relies upon unmet need being met in Hart; and it does not sufficiently address the Borough's significant affordable housing needs, nor is sufficient to address the Borough's ongoing housing affordability crisis.
- 8.7 In redressing these deficiencies, there is a clear need to increase the proposed Housing Requirement above the Council's current Standard Method derived figure. Such housing (and specifically affordable housing) needs comprise *exceptional circumstances* which justify and necessitate release of sites from the Green Belt for residential development.
- 8.8 The Council's proposed Spatial Strategy further compounds these issues, and introduces additional deficiencies, given its over-reliance upon large-scale, brownfield redevelopment sites, which detract from family and affordable housing delivery, and leave the Council's rolling housing land supply exposed to delays in the delivery process.

- 8.9 Somerston therefore advocates the Council should revisit the evidence base underpinning the DLP – specifically: the Sustainability Appraisal, the options and decisions taken regarding higher growth to meet more of the Borough’s affordable housing needs and to positively addressing market ownership and market rental affordability issues during the next plan period: the conclusions drawn in relation to the Green Belt work already completed and consideration of all appropriate alternative sites, including release of Green Belt sites.
- 8.10 The Land at Grove End, Bagshot, is one clear opportunity whereby its release from the Green Belt and allocation for the development of up to 135 new homes is there to be taken. Somerston is promoting the site for the development of up to 135 homes, including a minimum of at least 50% affordable housing. The intention is to deliver all 135 of the homes as affordable housing if access to appropriate funding is secured.
- 8.11 The site is *available* for development now, is *suitable* for residential development in a sustainable location, and is *achievable* for development in the early part of the plan period. The site is therefore *deliverable*, and we recommend that the DLP revisits its current chosen approach to not release sites in the Green Belt, such as Land at Grove End, accordingly.

APPENDIX 1. SITE LOCATION PLAN



Romsey T: 01794 367703 F: 01794 367276
Portishead T: 01275 407000 F: 01794 367276
Camberley T: 01276 749050 F: 01794 367276

Rev	Description	Date	Au	Ch
A	Planning Issue	17.01.23	PR/AA	PR/-

Project Land at Grove End, Bagshot
Drawing Site Location Plan - 02

Client	Somerton Development Projects		
Job no.	SOME201215	Date	17.01.23
Dwg no.	SLP-02	Rev.	A
Author	PR/AA	Checked	PR/-
Status	PLANNING	Scale	1:1000@A1
		Office	Romsey
Client ref.	-		

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APPENDIX 2. AFFORDABLE HOUSING NEED ASSESSMENT

Affordable Housing Statement

Land at Grove End, Bagshot

Affordable Housing Statement

Development of up to 135 dwellings, including a minimum 50% affordable homes, with associated landscaping, parking, open space, play areas, etc.: the construction of a new vehicular access on to Grove End serving the development of up to 135 dwellings: reconfiguration of the existing vehicular access serving the Windlesham Golf Club: and all other associated development works (Access only detailed matter with all other matters reserved).

Land at Grove End, Bagshot

Somerston Development Projects Limited

July 2023

OUR REF: M22/0409-02.RPT

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Introduction

Section 1

- 1.1 This Affordable Housing Statement is prepared by **Tetlow King Planning** (“TKP”) on behalf of **Somerston Development Projects Limited**. It examines the need for affordable housing in the Surrey Heath Borough Council administrative area (where the application site is located), as well as the local need for affordable housing in Bagshot Ward.
- 1.2 Planning permission is sought for *“Development of up to 135 dwellings, including a minimum 50% affordable homes, with associated landscaping, parking, open space, play areas, etc.: the construction of a new vehicular access on to Grove End serving the development of up to 135 dwellings: reconfiguration of the existing vehicular access serving the Windlesham Golf Club: and all other associated development works (Access only detailed matter with all other matters reserved).”*
- 1.3 The proposed development includes 50% on site affordable housing provision, which exceeds the requirements of adopted Policy CP5 of the Core Strategy and Development Management Policies DPD.
- 1.4 The proposed tenure split will be 25% intermediate, 25% first homes and 50% social rent (based on policy requirements) which reflects the requirements of the Core Strategy and Development Management Policies DPD. The proposed affordable housing will be secured by way of a Section 106 planning obligation.
- 1.5 This Statement makes clear that the enhanced offer of 50% affordable housing contributes towards the Very Special Circumstances (“VSCs”) which exist as part of this Green Belt planning application.
- 1.6 An appeal decision at Colney Heath¹ from June 2021 supports the view that the delivery of affordable housing in authorities with shortfalls in affordable housing delivery can contribute towards demonstrating VSCs. At Paragraph 54 of the decision the Inspector was clear that:

¹ Appeal reference: 3265925

“The persistent under delivery of affordable housing in both local authority areas presents a critical situation. Taking into account the extremely acute affordable housing position in both SADC and WHBC, I attach very substantial weight to the delivery of up to 45 affordable homes in this location in favour of the proposals.” (Emphasis added).

- 1.7 An appeal within the Green Belt at Little Chalfont² located in Buckinghamshire Council decided in March 2023 supports the view that very substantial weight should be afforded to the delivery of affordable housing in authorities with a shortfall in affordable housing provision (Paragraph 129):

“...both the main parties afford the proposed provision of 215 units of market housing and 152 affordable housing, very substantial weight.”

- 1.8 The Inspector also acknowledges the importance of TKP’s affordability evidence which is of particular relevance for this appeal as Hertsmere Borough Council’s lower quartile affordability ratio currently stands at 19.73, the highest in the East of England (Paragraph 131 of the appeal decision):

“For the last 15 years, the median and lower quartile levels of affordability within the District have been considerably higher in Buckinghamshire than the wider south-east. In respect of median house prices and lower quartile prices, the Little Chalfont ward has been significantly higher than for the rest of Buckinghamshire. A similar pattern is found for median private rents, which are higher across Buckinghamshire than the rest of the south-east.”

- 1.9 Providing a significant boost in the delivery of housing is a key priority of the Government’s National Planning Policy Framework (July 2021). Having a thriving active housing market that offers choice, flexibility and affordable housing is critical to our economic and social well-being.

- 1.10 This Affordable Housing Statement considers the need for affordable housing and the contribution that the proposed development can make towards meeting the affordable housing needs of the Surrey Heath Borough Council administrative area and of Bagshot Ward. It concludes that there is a genuine and acute need for the proposed affordable homes now and that planning permission should be granted promptly.

² Appeal reference: APP/X0415/W/22/3303868

- 1.11 The Statement takes account of a range of affordable housing indicators as well as consideration of national planning policy, performance against plan requirements, affordability issues, and the Council's own corporate objectives.
- 1.12 In undertaking this work, reliance has been placed upon data obtained through a Freedom of Information ("FOI") request which is included at **Appendix TKP1** of this Statement. The request was submitted on 19 May 2023 and a full response was received on 18 June 2023.
- 1.13 This statement comprises the following four sections:
- Section 2 reviews relevant Development Plan policies and other material considerations relevant to the site;
 - Section 3 provides analysis of affordable housing needs and delivery performance;
 - Section 4 sets out a range of affordability indicators; and
 - Section 5 provides our conclusions and recommendations.

The Development Plan and Related Policies

Section 2

Introduction

- 2.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 the application should be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 2.2 The adopted Development Plan Framework for Surrey Heath Borough Council comprises the Core Strategy and Development Management Policies Development Plan Document 2012 (now termed by the Council as the (“Local Plan”) which was adopted in February 2012 and Saved Policies from the 2000 Local Plan.
- 2.3 Other material considerations relevant to this application include the National Planning Policy Framework, July 2021 (the “NPPF”); the Planning Practice Guidance (ongoing updates); the emerging Local Plan 2019-2038; and a number of corporate documents.

Adopted Development Plan

Core Strategy and Development Management Policies DPD

- 2.4 The Local Plan is the overarching planning document for Surrey Heath Borough Council. The document sets out the Council’s planning strategy for the period 2011-2028.
- 2.5 Section 2 (page 9) sets out the profile of the Borough with paragraph 2.19 explaining that there are serious affordability problems in the Borough:

*“The largest area of need for smaller properties is in the urban areas mainly in and around Camberley. **Surrey Heath is ranked 267th out of 376 districts in England and Wales for affordability of housing.** This reflects the relative wealth of the area, but also contributes to the difficulty of attracting lower paid skilled workers into the area, due to the **shortage of smaller cheaper homes.** In 2009 the Land Registry identified the average property price in the Borough as being £250,000 which is approximately 8 times the average household income of £29,446.”* (emphasis added).

- 2.6 Section 3 (Page 16) sets out the key challenges facing the Borough. Paragraph 3.2 states that *“affordability is still a major concern”* despite a fall in house prices observed between 2004 and 2009.
- 2.7 Paragraph 3.11 goes on to explain that *“The high cost of housing and cost of living means that affording a place to live is a problem even for those on average incomes. The North West Surrey and North East Hampshire Strategic Housing Market Assessment³ identified a net annual shortfall of 632 affordable units per annum in Surrey Heath. The greatest need is for social rented housing.”*
- 2.8 Page 18 includes the strengths, weaknesses, opportunities, and threats facing the Borough. Lack of affordable housing is included as a weakness and increasing the provision of affordable housing is an opportunity.
- 2.9 **Policy CP5** (Affordable Housing) states that developments of 15 or more dwellings (net) should provide 40% on-site affordable housing provision. The supporting text explains that *“The North West Surrey and North East Hampshire Strategic Housing Market Assessment 2009 suggested a target for Surrey Heath of 40% of all new housing to be affordable”*.
- 2.10 **Policy CP5** goes on to state that *“Over the lifetime of the Core Strategy, the Borough Council will seek a target of 35% of all net additional housing as affordable, split evenly between social rented and intermediate.”*
- 2.11 **Policy CP6** (Dwelling Size and Type) states that *“The Borough Council will promote a range of housing types and tenures which reflect the demand for market housing and need for affordable housing, including accommodation for specialised needs. The Borough Council will encourage market housing and unless evidence of housing need or viability suggests otherwise, generally expect intermediate affordable and social rented units to be provided in accordance with the Strategic Housing Market Assessment or other subsequent assessments.”*
- 2.12 The supporting text to **Policy CP6** also explains that:
- “In Surrey Heath only 10% of all household spaces are classed as ‘small dwellings’ compared with 36% across the South East. 47% of the Borough’s housing stock is in the form of detached dwellings, more than twice the national level of 22% and the stock of entry level properties (flats/ maisonettes/terraces)*

³ Published in 2009

is 27% compared with the national average of 45%” (paragraph 5.34 of the Local Plan).

2.13 Paragraph 5.35 goes on to state that:

“The mix of housing in Surrey Heath is therefore significantly out of balance with the South East and the UK. In addition, there is an increased level of household formation made up principally of smaller households due to increasing levels of divorce, separation and a rising birth rate, a trend that is set to continue into the future. The likely result is longer travel distances for those who work in the Borough but are unable to secure appropriate accommodation within the Borough, and an unbalanced population structure within the community.”

2000 Local Plan Saved Policies

2.14 A small number of the saved policies from the 2000 Local Plan were retained after February 2012 when the Core Strategy and Development Management Policies DPD was adopted.

2.15 Policy H10 (Affordable Housing within settlement areas) is now superseded by Policy CP5 (Affordable Housing). As such, none of the ‘Saved’ policies are considered relevant to affordable housing or this proposal.

Other Material Considerations

National Planning Policy Framework (July 2021)

2.16 The revised NPPF was last updated on 20 July 2021 and is a material planning consideration. It is important in setting out the role of affordable housing in the planning and decision-making process.

2.17 It sets a strong emphasis on the delivery of sustainable development. Fundamental to the social objective is to *“support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations”* (paragraph 8).

2.18 Chapter 5 of the NPPF (2021) focuses on delivering a sufficient supply of homes, in which paragraph 60 confirms the Government’s objective of *“significantly boosting the supply of homes”*.

2.19 The NPPF (2021) is clear that local authorities should deliver a mix of housing sizes, types and tenures for different groups, which include *“those who require affordable*

housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes” (paragraph 63).

- 2.20 It places a great responsibility on all major developments (involving the provision of housing) to provide an element of affordable housing. Paragraph 65 establishes that *“at least 10% of new homes on major residential developments be available for affordable home ownership”*.
- 2.21 Affordable housing is defined within the NPPF (2021) glossary as affordable housing for rent (in accordance with the Government’s rent policy for Social Rent or Affordable Rent or is at least 20% below local market rents), Starter Homes, discounted market sales housing (at least 20% below local market value) and other affordable routes to home ownership including shared ownership, relevant equity loans, other low-cost homes for sale (at least 20% below local market value) and rent to buy (which includes a period of intermediate rent).

Planning Practice Guidance (March 2014, Ongoing Updates)

- 2.22 The PPG was first published online on 6 March 2014 and is subject to ongoing updates. It replaced the remainder of the planning guidance documents not already covered by the NPPF and provides further guidance on that document’s application.

Interim Procedural Guidance for Core Strategy & Development Management Policies
DPD – Affordable Housing Policies CP5 & CP6

- 2.23 This procedural guidance was produced to support the implementation of Core Strategy & Development Management Policies CP5: Affordable Housing and CP6: Dwelling Size & Type until the production of an Affordable Housing Supplementary Planning Document (“SPD”). Work on an Affordable Housing SPD was planned for 2012/2013 but this does not appear to have taken place.
- 2.24 In terms of Policy CP5, the guidance states that On sites of 5 or more units (net) the presumption will be for affordable housing to be provided on-site and only in exceptional circumstances will an alternative to on-site provision be acceptable.
- 2.25 In terms of tenure mix, the guidance explains that developers should refer to the most recent assessment of affordable housing need (paragraph 6.5). In this instance the Housing Needs Assessment 2020 (referred to at paragraph 6.43) states that *“the provision of affordable home ownership should be more explicitly focused on delivering smaller family housing for younger households.”* It goes on to recommend a mix of 10-

15% affordable homeownership for 1 bedroom dwellings and 45-50% for 2-bedroom dwellings (see paragraph 2.12 above for full details).

Emerging Local Plan 2019-2038

- 2.26 The Emerging Local Plan 2019-2038 is currently at the Preferred Options consultation stage (Regulation 18) which concluded in May 2022.
- 2.27 According to the Local Development Scheme 2023-2026, consultation on a pre-submission version of the Emerging Local Plan 2019-2038 is set to take place in November 2023 with adoption anticipated for February 2025.
- 2.28 **Draft Policy H7** (Affordable Housing) states that *“Residential development on all sites of 10 or more residential dwellings, or a site area of 0.5ha and above, will be permitted that deliver 40% affordable housing... 25% of affordable housing will be provided as first homes”*.
- 2.29 **Draft Policy H7** goes on to explain that *“The mix of dwelling sizes must reflect the Council’s housing needs evidence as set out in the Housing Need Assessment (2020) or any subsequent update, and have regard to the size, characteristics and location of the site”*.

Corporate Documents

Homelessness and Rough Sleeping Strategy 2019-2023

- 2.30 The Surrey Heath Homelessness and Rough Sleeping Strategy covers the period 2019 -2023. The strategy is accompanied by an Action Plan which details the work the council will do to tackle homelessness.
- 2.31 Section 2.2 on pages 9 and 10 identifies ‘*The end of an Assured Shorthold Tenancy (AST)*’ as a cause of homelessness in Surrey Heath, accounting for over a third of households accepted as homeless in the area. It explains an increase in the end of an AST has a number of underlying factors, including *“the increased number of people in the private rented sector (both those unable to access a scarce supply of social housing and those unable to access homeownership) and the issue of affordability with incomes not keeping pace with rent levels and Local Housing Allowance being frozen.”*
- 2.32 Page 9 continues, explaining that *“For those on low incomes or reliant on benefits the freeze in Local Housing Allowance, the financial help available towards rent, has meant an increasing gap between the help available and average rents requiring households to find money to ‘top up’ the assistance they get to meet their rent obligations.”*

- 2.33 Section 3.1 (Rough Sleepers) on pages 14 to 16 discusses pathways out of homelessness for this group. In doing so, page 14 identifies a series of issues that the council are aware of which lead to homelessness and make finding a home difficult, among these issues are *“LHA freeze meaning financial assistance with rent does not meet local rent levels (see table below); Universal Credit being unpopular with landlords”* and a *“lack of affordable housing”*.
- 2.34 Section 2.4 (page 18) explains the impact of ‘Welfare Reform’ on residents. In doing so it identifies a series of local impacts which are set out below.
- *The freeze in local housing allowance pricing residents out of the private rented market as the help available fails to match market rents;*
 - *Families affected by the benefit cap struggling to meet housing costs, even in housing association homes;*
 - *Accent report that tenants on Universal Credit carry higher rent arrears levels than other tenants;*
 - *Landlords being less willing to take homeless households into private rented tenancies, especially single people, as previously the Council could pay Housing Benefit direct to the landlord while Universal Credit goes to the tenants unless there are arrears; and*
 - *Residents refusing offers of housing association homes on affordable rents as they cannot afford them”*.
- 2.35 Page 19 goes on to explain that *“The double impact of welfare reform has been to make some peoples current home harder to afford while restricting the options available to people on benefits.”*
- 2.36 Section 3.5 (pages 20 to 21) explores ‘Residents whose housing is impacted by their mental health’. Page 20 explains *“In a study by Shelter in 2017 housing affordability was the most frequently referenced issue by those who saw housing pressures having a negative impact upon their mental health.”*
- 2.37 Section 4 on pages 21 to 23 seeks to increase the supply of accommodation. Page 21 acknowledges that demand for social housing in the borough is *“always outstripped by supply”*. Section 4 goes on to explain the impact of the Thames Basin SPA and viability issues on the delivery of affordable housing, it also acknowledges that *“Private rented housing is increasingly unaffordable for people on low incomes and benefits.”*

Five Year Strategy Priorities and Targets 2022-27

- 2.38 The Council's Five Year Strategy covers the period 2022 to 2027 and relates to the Council's wider activities and objectives. The Strategy has been informed by a public consultation to find out what residents, partners and businesses "*loved about Surrey Heath, what needed improving and their aspirations for the future of the borough.*"
- 2.39 The Five Year Strategy covers four priorities, namely Environment, Health & Quality of Life, Economy and Effective and Responsive Council. Page 1 provides a brief overview of each priority, under the priority '*Health & Quality of Life*', the council set an aim "*to ensure everyone can access a safe, quality home to meet their needs.*"
- 2.40 Pages 7 to 11 expand the priority '*Health & Quality of life*' further. In doing so, page 7 of the strategy sets out several aims. It explains that the council "*will deliver new homes that people can afford by finding ways to provide more good quality, genuinely affordable housing, including at least 100 new socially rented homes through Housing Associations for those with the lowest income levels, to better provide for the needs of all Surrey Heath residents.*"
- 2.41 Pages 8 to 11 sets out a series of action that seek to achieve the aims that the priority sets out. Page 10 explains the council will "*Where housing is delivered, do all that we can within the confines of legislation to maximise the amount of affordable and socially rented homes. Deliver at least 300 affordable homes across the borough of which 100 will be new socially rented homes and build at least 49 homes through a joint venture to support people receiving housing benefit or being paid minimum wages.*"

Summary

- 2.42 This section clearly highlights that within adopted policy, providing all forms of housing including affordable housing has long been established as, and remains a key aspiration/priority for the Council's to address the local affordable housing crisis.

Affordable Housing Needs and Past Delivery

Section 3

Affordable Housing Needs

- 3.1 The adopted Local Plan seeks to secure the overall delivery of 35% affordable housing across the Borough.
- 3.2 However, the Local Plan policy was prepared several years ago, and it is therefore important to consider the objectively assessed need for affordable housing within the most up-to-date assessments of local housing need.
- 3.3 As highlighted in Section 2 above, the Local Plan refers to the Strategic Housing Market Assessment 2009, which identified a need for 632 affordable dwellings per annum over a five-year period between 2008 and 2013. This assessment has since been superseded by three successive documents, each of which has adopted a revised methodology and the latter two have sought to identify the need for affordable routes to home ownership.

Strategic Housing Market Assessment 2014

- 3.4 The Strategic Housing Market Assessment 2014 (“2014 SHMA”) was published in December 2014 and identifies the objectively assessed affordable housing need for Surrey Heath Borough Council for the twenty-year period between 2011/12 and 2031/32.
- 3.5 Figure 8.6 (page 98) of the SHMA 2014 sets out the overall net affordable housing need figure of 86 affordable dwellings per annum between 2011/12 and 2031/32.
- 3.6 In addition, paragraph 8.70 of the SHMA 2014 identifies some 1,280 households across the wider housing market area (Surrey Heath, Hart and Rushmoor authority areas) who are not in affordable housing need but are seeking an affordable route to home ownership. The SHMA 2014 does not set out an annualised figure for the need for affordable home ownership options in Surrey Heath.

Strategic Housing Market Assessment 2016

- 3.7 This iteration of the SHMA was published in November 2016 (“2016 SHMA”) and identifies the objectively assessed affordable housing need for Surrey Heath Borough Council for the eighteen-year period between 2014/15 and 2032/33.
- 3.8 Figure 10.26 (page 166) of the 2016 SHMA sets out the need for both affordable rented dwellings and affordable home ownership giving an overall net affordable housing need figure of 290 affordable dwellings per annum between 2011/12 and 2031/32. This annual figure breaks down as 100 dwellings for affordable rent, and a further 190 dwellings for affordable home ownership.

Surrey Heath Housing Needs Assessment 2020

- 3.9 The Housing Needs Assessment 2020 (“2020 HNA”) was published in May 2020 and identifies the objectively assessed affordable housing need for Surrey Heath Borough Council for the twenty-year period between 2020/21 and 2040/41.
- 3.10 The summary of Key Messages at page 62 of the Housing Needs Assessment 2020 sets out the overall net affordable housing need figure of 159 affordable rented dwellings per annum between 2020/21 and 2040/41, and a further 102 affordable home ownership dwellings per annum over the same period. This gives an aggregate need of 261 affordable dwellings per annum.

Past affordable housing delivery in Surrey Heath Borough

- 3.11 Figure 3.1 illustrates the gross delivery of affordable housing in Surrey Heath Borough since the start of the Local Plan period in 2011/12.

Figure 3.1: Surrey Heath Borough Council Gross Additions to Affordable Housing Stock 2011/12 to 2022/23

Monitoring Year	Total Housing Completions (Net)	Additions to Affordable Housing Stock (Gross)	Gross affordable additions as a %age total completions
2011/12	179	74	41%
2012/13	217	20	9%
2013/14	127	6	5%
2014/15	187	0	0%
2015/16	305	20	7%
2016/17	226	30	13%
2017/18	224	36	16%
2018/19	368	101	27%
2019/20	376	132	35%
2020/21	352	39	11%
2021/22	370	112	30%
2022/23	403	69	17%
Total	3,334	639	19%
Ave. PA.	278	53	19%

Source: Freedom of Information response 18 June 2023

- 3.12 Figure 3.1 demonstrates that over the 12-year period between 2011/12 and 2022/23, the Council has added an average of 53 gross affordable homes per annum, equivalent to 19% of the total number of housing completions. This is nowhere near the 35% delivery that is anticipated in Policy CS5.
- 3.13 This annual average rate of delivery compares poorly with any of the recent assessments of affordable housing need (2014 SHMA; 2016 SHMA; and the 2020 HNA). By way of comparison, the most recent assessment of housing need, the 2020 HNA requires 261 affordable dwellings per annum between 2020 and 2040.

Accounting the Right to Buy

- 3.14 It is important to note that gross affordable completions figures do not take into account any losses from the affordable housing stock through the Right to Buy. As set out below, once such losses are taken in to account the Council's gross completions figure falls by 4% to 615 net affordable dwellings over the 12-year period between 2011/12 and 2022/23, to an average of 51 per annum. See Figure 3.2 below.

- 3.15 At a national level almost two million households have exercised their Right to Buy since it was introduced in 1980. In July 2015, the Conservative Government published 'Fixing the Foundations: Creating a More Prosperous Nation' which confirms that the Government is committed to extending the Right to Buy to housing association tenants, noting that "*since the Right to Buy for Council tenants was reinvigorated in the last Parliament, the number of sales has increased by nearly 320%*".
- 3.16 The Government's Housing White Paper (February 2017) sets out at paragraph 4.22 that the reinvigoration of the Right to Buy scheme in 2012 which increased discounts significantly, has resulted in over 60,000 affordable homes being sold. This is equivalent to an average of 12,000 affordable homes lost per year, every year, on a national basis for the five-year period between 2012 and 2017.
- 3.17 In Tetlow King Planning's view, the extension of Right to Buy to Housing Association tenants will further increase the loss of existing affordable housing stock, putting increasing pressure on the need to deliver more affordable homes in the Borough in the future.
- 3.18 Right to Buy data has been derived from the Private Registered Provider Social Housing Stock in England Statistical Data Returns (SDR) 2012 to 2021. It should be noted that the Council does not hold any of its own affordable housing stock so no Local Authority Right to Buy losses have been recorded.
- 3.19 Figure 3.2 below demonstrates that a total of 24 Right to Buy sales were recorded, an average of 2 dwellings per annum, over the 12-year period between 2011/12 and 2022/23.

Figure 3.2: Losses to stock through Right to Buy sales in the Surrey Heath Borough Council area 2011/12 to 2022/23

Monitoring Year	Registered Provider Right to Buy sales (Total)
2011/12	1
2012/13	1
2013/14	10
2014/15	5
2015/16	2
2016/17	4
2017/18	0
2018/19	0
2019/20	0
2020/21	0
2021/22	1
2022/23	N/A
Total	24
Ave PA.	2

Source: Private Registered Provider Social Housing Stock in England: Statistical Data Returns (2013/14 to 2020/21)

3.20 Figure 3.3 below calculates the net affordable housing delivery per annum since the start of the Local Plan period in 2011/12, when accounting for Right to Buy losses to affordable housing stock. The loss of 24 affordable dwellings over this period equates to 5% of the gross affordable housing completions set out in Figure 3.1.

Figure 3.3 Surrey Heath Borough Council Net Additions to Affordable Housing Stock 2011/12 to 2022/23

Monitoring Year	Total Housing Completions (Net)	Additions to Affordable Housing Stock (Gross)	Total losses to stock through Right to Buy sales	Additions to Affordable Housing Stock (Net)	Net affordable additions as a %age of total completions
2011/12	179	74	1	73	41%
2012/13	217	20	1	19	9%
2013/14	127	6	10	-4	-3%
2014/15	187	0	5	-5	-3%
2015/16	305	20	2	18	6%
2016/17	226	30	4	26	12%
2017/18	224	36	0	36	16%
2018/19	368	101	0	101	27%
2019/20	376	132	0	132	35%
2020/21	352	39	0	39	11%
2021/22	370	112	1	111	30%
2022/23	403	69	N/A	69	17%
Total	3,334	639	24	615	19%
Ave PA.	278	53	2	51	19%

Source: Freedom of Information response 18 June 2023; Private Registered Provider Social Housing Stock in England: Statistical Data Returns (2013/14 to 2021/22).

Affordable Housing Delivery compared to Objectively Assessed Needs

- 3.21 Figure 3.4 illustrates net affordable housing delivery compared to the affordable housing need of 86 net affordable dwellings per annum between 2011/12 and 2022/23, as set out in the 2014 SHMA.
- 3.22 Over this period, affordable housing completions have averaged 42 net affordable dwellings per annum, against a need of 86 net affordable dwellings per annum. A shortfall of -417 affordable dwellings has arisen over this period, equivalent to an average annual shortfall of -35.

Figure 3.4: Net Affordable Housing Delivery Compared to 2014 SHMA identified needs

Monitoring Year	Additions to Affordable Housing Stock (Net)	Affordable Housing Need – 2014 SHMA	Surplus / Shortfall
2011/12	73	86	13
2012/13	19	86	-67
2013/14	-4	86	-90
2014/15	-5	86	-91
2015/16	18	86	-68
2016/17	26	86	-60
2017/18	36	86	-50
2018/19	101	86	15
2019/20	132	86	46
2020/21	39	86	-47
2021/22	111	86	25
2022/23	69	86	-17
Total	615	1,032	-417
Ave PA.	51	86	-35

Source: Freedom of Information response 18 June 2023; Private Registered Provider Social Housing Stock in England: Statistical Data Returns (2011/12 to 2020/21); 2014 SHMA.

- 3.23 Figure 3.5 illustrates net affordable housing delivery compared to the affordable housing need of 290 net affordable dwellings per between 2014/15 and 2032/33, as set out in the 2016 SHMA.
- 3.24 Over this period, affordable housing completions have averaged 38 net affordable dwellings per annum, against a need of 290 net affordable dwellings per annum. A shortfall of -2,078 affordable dwellings has arisen over this period, equivalent to an average annual shortfall of -231.

Figure 3.5: Net Affordable Housing Delivery Compared to 2016 SHMA identified needs

Monitoring Year	Additions to Affordable Housing Stock (Net)	Affordable Housing Need – 2016 SHMA	Surplus / Shortfall
2014/15	-5	290	-295
2015/16	18	290	-272
2016/17	26	290	-264
2017/18	36	290	-254
2018/19	101	290	-189
2019/20	132	290	-158
2020/21	39	290	-251
2021/22	111	290	-179
2022/23	69	290	-221
Total	532	2,610	-2,078
Ave PA.	59	290	-231

Source: Freedom of Information response 18 June 2023; Private Registered Provider Social Housing Stock in England: Statistical Data Returns (2011/12 to 2020/21); 2016 SHMA.

- 3.25 Figure 3.6 illustrates net affordable housing delivery compared to the affordable housing need of 261 net affordable dwellings per annum between 2020/21 and 2040/41, as set out in the 2020 HNA.
- 3.26 Over this period, affordable housing completions have averaged 25 net affordable dwellings per annum, against a need of 261 net affordable dwellings per annum. A shortfall of -564 affordable dwellings has already arisen over the first two years of this period, equivalent to -188 per annum.

Figure 3.6: Net Affordable Housing Delivery Compared to 2020 HNA identified needs

Monitoring Year	Additions to Affordable Housing Stock (Net)	Affordable Housing Need – 2020 HNA	Surplus / Shortfall
2020/21	39	261	-222
2021/22	111	261	-150
2022/23	69	261	-192
Total	219	783	-564
Ave PA.	73	261	-188

Source: Freedom of Information response 18 June 2023; Private Registered Provider Social Housing Stock in England: Statistical Data Returns (2011/12 to 2020/21); 2020 HNA.

- 3.27 The above tables show that shortfalls have arisen against both assessments of housing need in the Surrey Heath Borough Council area. Overall, the analysis demonstrates that affordable housing delivery in the Surrey Heath Borough area has fallen persistently short of identified needs over a period of ten years.
- 3.28 Against the most recent assessment of affordable housing need contained in the Housing Needs Assessment 2020 it is notable that a shortfall of -564 net affordable dwellings has accrued in the first three years of the period between 2020/21 and 2022/23. It is clear in any of these scenarios that insufficient affordable housing is being provided and that a step change in the delivery of affordable housing is required now.

Conclusions on Affordable Housing Needs and Past Delivery

- 3.29 The above evidence demonstrates that across the Surrey Heath Borough area, the delivery of affordable housing has fallen persistently short of meeting identified needs.
- 3.30 In the 12-year period since the start of the Local Plan period in 2011/12, net affordable housing delivery represented just 19% of overall housing delivery, equating to just 51 net affordable dwellings per annum.
- 3.31 When comparative analysis is undertaken against any of the assessments of affordable housing need in the Surrey Heath Borough Council area (the 2014 SHMA; 2016 SHMA; and 2020 HNA) significant shortfalls have arisen in the provision of affordable housing.
- 3.32 It is clear that a 'step change' in affordable housing delivery is needed now in the Surrey Heath Borough Council area to address these shortfalls and ensure that a significantly greater level of future needs for affordable housing can be met.

Affordability Indicators

Section 4

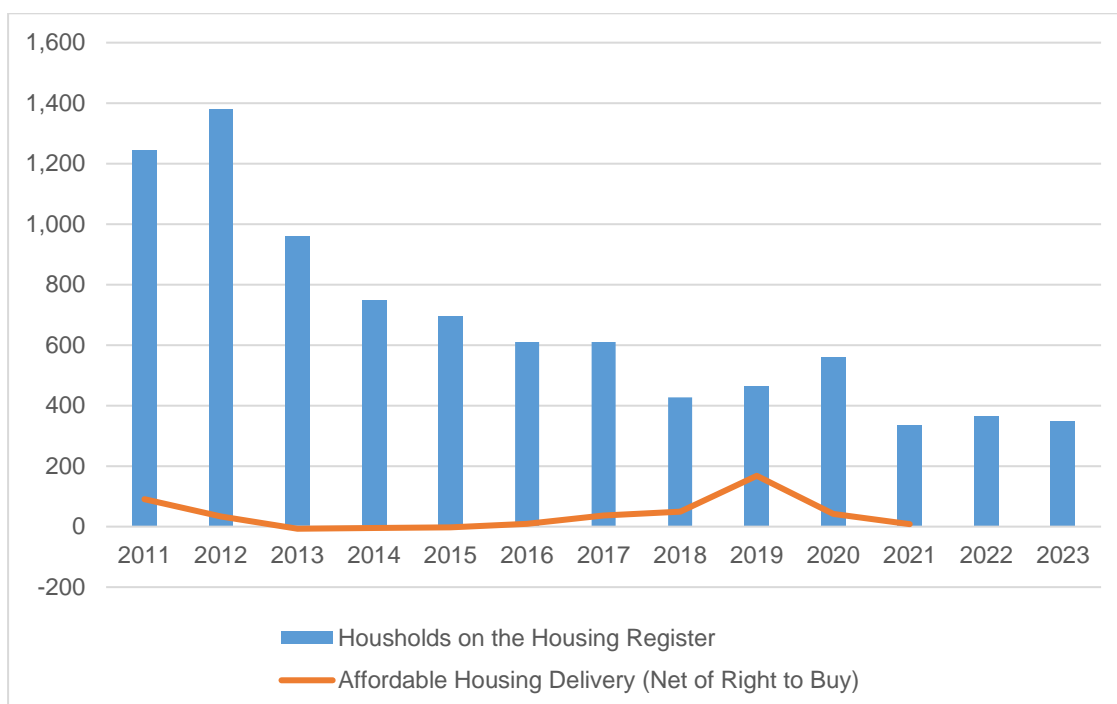
Market Signals

- 4.1 The PPG recognises the importance of giving due consideration to market signals as part of understanding affordability. It is acknowledged that this is in the context of plan making.

Housing Register

- 4.2 The Council's FOI response (**Appendix TKP1**) confirms that as at 31st March 2023 there were 347 households on the Housing Register.
- 4.3 According to the Council's FOI response (**Appendix TKP1**), of the 347 households on the Housing Register at 31st March 2023, 166 households specified a preference for an affordable home in Bagshot Ward; this represents 48% of the housing register.
- 4.4 Figure 4.1 provides a comparative analysis of the number of households on the Housing Register and affordable housing delivery (net of Right to Buy) across Surrey Heath Borough since the start of the Local Plan period in 2011/12.

Figure 4.1: Number of Households on the Housing Register Compared with Affordable Housing Delivery (Net of Right to Buy), 2011/12 to 2021/22



Source: DLUHC Live Table 122, 600 and 1008c; Private Registered Provider Social Housing Stock in England: Statistical Data Returns (2011/12 to 2020/21)

Note: completions figures are not yet available for the 2022/23 and 2023/24 monitoring periods

4.5 As Figure 4.1 clearly illustrates, affordable housing delivery has failed to keep pace with identified need on the housing register by a considerable margin for every single year in Surrey Heath Borough since 2011.

4.6 Footnote 4 of DLUHC⁴ Live Table 600 highlights that:

“The Localism Act 2011, which came into force in 2012, gave local authorities the power to set their own qualification criteria determining who may or may not go onto the housing waiting list. Previously, local authorities were only able to exclude from their waiting list people deemed guilty of serious unacceptable behaviour. The Localism Act changes have contributed to the decrease in the number of households on waiting lists since 2012” (emphasis added).

4.7 Evidently the result of the Localism Act is that many local authorities, including Surrey Heath Borough, have been able to exclude applicants already on Housing Register

⁴ Department for Levelling Up, Housing and Communities

waiting lists who no longer meet the new narrower criteria but who are still in need of affordable housing.

- 4.8 Following the 2012 changes brought about by the Localism Act, in August 2012 Surrey Heath Borough Council published a revised Housing Allocations Scheme which received further revisions in **April 2020**.
- 4.9 Whilst restricting the entry of applicants on to the Housing Register may temporarily reduce the number of households on the waiting list, this does not reduce the level of need, it merely displaces it.
- 4.10 It may also have other negative impacts when you consider that those who are excluded from the register may be forced to move away from Surrey Heath Borough to cheaper more affordable areas but due to their connections to the area, they still have to commute back into the area to visit friends, family and travel to their place of work.
- 4.11 One clear impact of this is that such an eventuality would generate extra traffic which brings in to question the sustainability of such an approach.
- 4.12 The ability of Local Authorities to set their own qualification criteria in relation to Housing Registers was recognised by the Planning Inspector presiding over an appeal at Oving Road, Chichester⁵ in August 2017. In assessing the need for affordable housing in the district, and in determining the weight to be attached to the provision of affordable housing for the scheme which sought to provide 100 dwellings; the Inspector acknowledged at paragraph 63 of their report that:

“The provision of 30% policy compliant affordable houses carries weight where the Council acknowledges that affordable housing delivery has fallen short of meeting the total assessed affordable housing need, notwithstanding a recent increase in delivery. With some 1,910 households on the Housing Register in need of affordable housing, in spite of stricter eligibility criteria being introduced in 2013 there is a considerable degree of unmet need for affordable housing in the District. Consequently, I attach substantial weight to this element of the proposal” (emphasis added).

⁵ Appeal reference: APP/L3815/W/16/3165228

- 4.13 Furthermore, in the recent appeal decision at Oxford Brookes University Campus at Wheatley⁶, Inspector DM Young asserted at paragraph 13.101 of their report that in the context of a lengthy housing register of 2,421 households:

“It is sometimes easy to reduce arguments of housing need to a mathematical exercise, but each one of those households represents a real person or family in urgent need who have been let down by a persistent failure to deliver enough affordable houses” (emphasis added).

- 4.14 The Inspector went on to state at paragraph 13.102 that:

“Although affordable housing need is not unique to this district, that argument is of little comfort to those on the waiting list” before concluding that “Given the importance attached to housing delivery that meets the needs of groups with specific housing requirements and economic growth in paragraphs 59 and 80 of the Framework, these benefits are considerations of substantial weight”.

- 4.15 In undertaking the planning balance, the Inspector stated at paragraph 13.111 of their report that:

“The Framework attaches great importance to housing delivery that meets the needs of groups with specific housing requirements. In that context and given the seriousness of the affordable housing shortage in South Oxfordshire, described as “acute” by the Council, the delivery of up to 500 houses, 173 of which would be affordable, has to be afforded very substantial weight”.

- 4.16 In determining the appeal, the Secretary of State concurred with these findings, thus underlining the importance of addressing needs on the Housing Register, in the face of acute needs and persistent under delivery. In my opinion the numbers on LPA’s housing register remains high.

- 4.17 It is important to note that the Housing Register is only part of the equation relating to housing need. The housing register does not constitute the full definition of affordable housing need as set out in the NPPF – Annex 2 definitions i.e. affordable rented, starter homes, discounted market sales housing and other affordable routes to home ownership including shared ownership, relevant equity loans, other low-cost homes for sale and rent to buy, provided to eligible households whose needs are not met by the market.

⁶ Appeal reference: APP/Q3115/W/19/3230827

- 4.18 In short, there remains a group of households who fall within the gap of not being eligible to enter the housing register but who also cannot afford a market property and as such are in need of affordable housing. It is those in this widening affordability gap who, TKP suggest, the Government intends to assist by increasing the range of affordable housing types in the most recent NPPF.
- 4.19 The Franklands Drive Secretary of State appeal decision in 2006⁷ underlines how the Housing Register is a limited source for identifying the full current need for affordable housing. At paragraph 7.13 of the Inspector’s report the Inspector drew an important distinction between the narrow statutory duty of the Housing Department in meeting priority housing need under the Housing Act, and the wider ambit of the planning system to meet the much broader need for affordable housing.
- 4.20 As such the number of households on the Housing register will only be an indication of those in priority need and whom the Housing Department have a duty to house. But it misses thousands of households who are in need of affordable housing, a large proportion of whom will either be living in overcrowded conditions with other households or turning to the private rented sector and paying unaffordable rents.

Housing Register Bids and Lettings

- 4.21 Figure 4.2 below demonstrates average number of bids per property in Bagshot Ward over the 2022/23 monitoring period for a range of types of affordable property.

Figure 4.2: Bids Per Property in Bagshot Ward, March 2022 to March 2023

Type of affordable property	Average Bids Per Property (1 April 2022 to 31 March 2023)
	Bagshot Ward
1-bed affordable dwelling	22
2-bed affordable dwelling	None advertised
3-bed affordable dwelling	26
4+ bed affordable dwelling	None advertised

Source: Freedom of Information response 18 June 2023

- 4.22 Figure 4.2 demonstrates that between 1 April 2022 to 31 March 2023 there were an average of 22 bids per 1-bed affordable dwelling put up for let in the ward and 26 bids per 3-bedroom affordable dwelling. It should be noted that no 2-bedroom or 4-bedroom affordable dwellings were advertised in Bagshot Ward during the 2022/23 monitoring period.

⁷ Appeal reference: APP/Q3630/A/05/1198326

- 4.23 This should be viewed in context of the fact that the FOI response also highlights that over the 2022/23 monitoring period there were just 10 social housing lettings in Bagshot Ward. This compares to 17 social housing lettings during the 2021/22 monitoring period, a decrease of 41%.
- 4.24 For every successful letting, there are clearly tens, if not hundreds of households who have missed out and are left waiting for an affordable home. Evidently there is a clear and pressing need for affordable homes within the ward this is not being met.

Help to Buy Register

- 4.25 Further evidence in respect of the need across LPA for affordable housing is provided in information from Help to Buy South, at **Appendix TKP2**.
- 4.26 Help to Buy South is one of three agents appointed by the Government to help provide Help to Buy schemes across England. They cover the South of England. Households who are seeking shared ownership homes are required to register with Help to Buy South so that they may apply for properties.
- 4.27 The Help to Buy Register provides details of those seeking shared-ownership accommodation in the south of England. This demonstrates that as of 24 March 2023, 630 households are seeking a shared ownership home in Surrey Heath Borough. This is clearly a significant proportion of those seeking assistance with their housing.

Temporary Accommodation

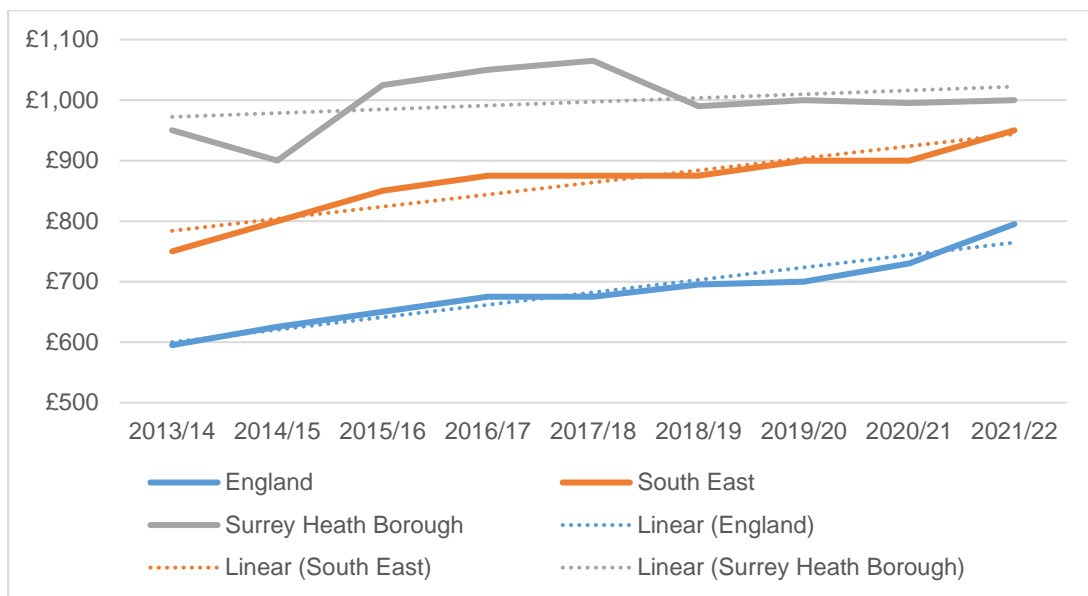
- 4.28 The FOI response details that 46 households were housed in temporary accommodation within the Surrey Heath Borough at 31 March 2022. Surrey Heath Borough Council has a responsibility to house these households.
- 4.29 Furthermore, an additional 44 households were housed in temporary Bed and Breakfast accommodation outside the Surrey Heath Borough at 31 March 2022.
- 4.30 Not only does this mean that those in need of affordable housing are being housed in temporary accommodation, which is unlikely to be suited to their needs, but they may also be located away from their support network.
- 4.31 The *“Bleak Houses: Tackling the Crisis of Family Homelessness in England”* report published in August 2019 by the Children’s Commissioner found that temporary accommodation presents serious risks to children’s health, wellbeing and safety, particularly families in B&Bs where they are often forced to share facilities with adults engaged in crime, anti-social behaviour or those with substance abuse issues.

4.32 Other effects include lack of space to play (particularly in cramped B&Bs where one family shares a room) and a lack of security and stability. The report found (page 12) that denying children their right to adequate housing has a “*significant impact on many aspects of their lives*”.

Private Rental Market

4.33 Valuation Office Agency (“VOA”) and Office for National Statistics (“ONS”) data (first produced in 2013/14) show that median private rents in Surrey Heath Borough stood at £1,000 per calendar month (“pcm”) in 2021/22. This represents a 5% increase from 2013/14 where median private rents stood at £950 pcm.

Figure 4.3: Median Private Sector Rents, 2013/14 to 2021/22



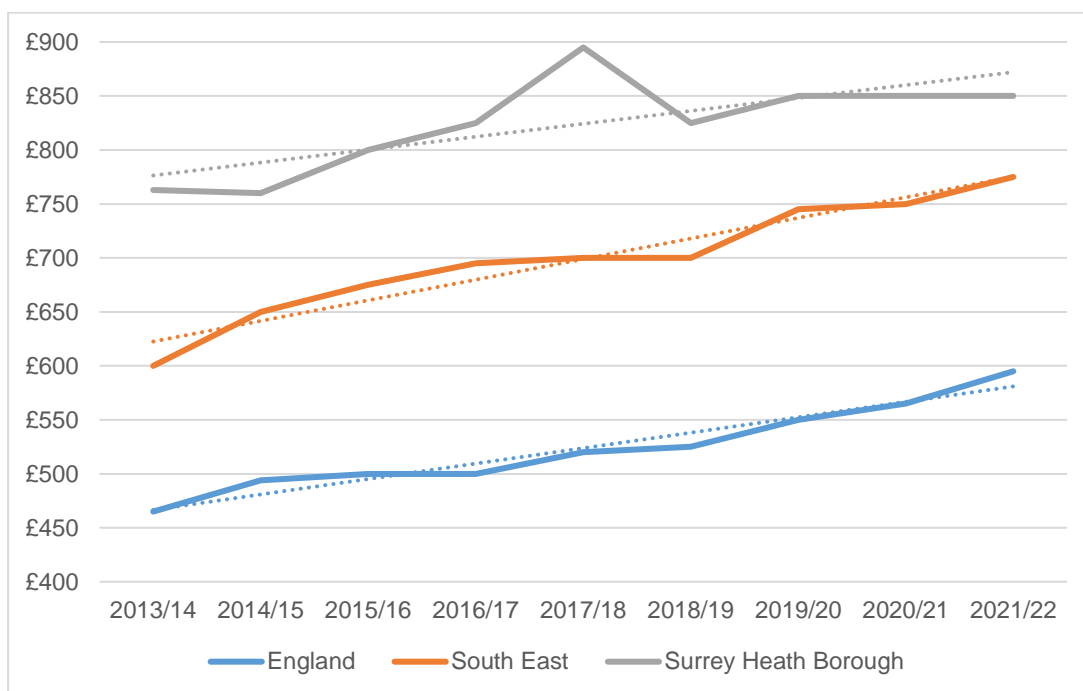
Source: VOA and ONS Private Rental Market Statistics

4.34 A median private rent of £1,000 pcm in 2021/22 is 5% higher than the South East figure of £950 pcm and 26% higher than the national figure of £795 pcm.

4.35 Lower quartile private sector rents are representative of the ‘entry level’ of the private rented sector and include dwellings sought by households on lower incomes.

4.36 The average lower quartile monthly rent in Surrey Heath Borough in 2021/22 was £850 pcm. This represents a 11% increase from 2013/14 where average lower quartile monthly rents stood at £763 pcm.

Figure 4.4: Lower Quartile Private Sector Rents, 2013/14 to 2021/22



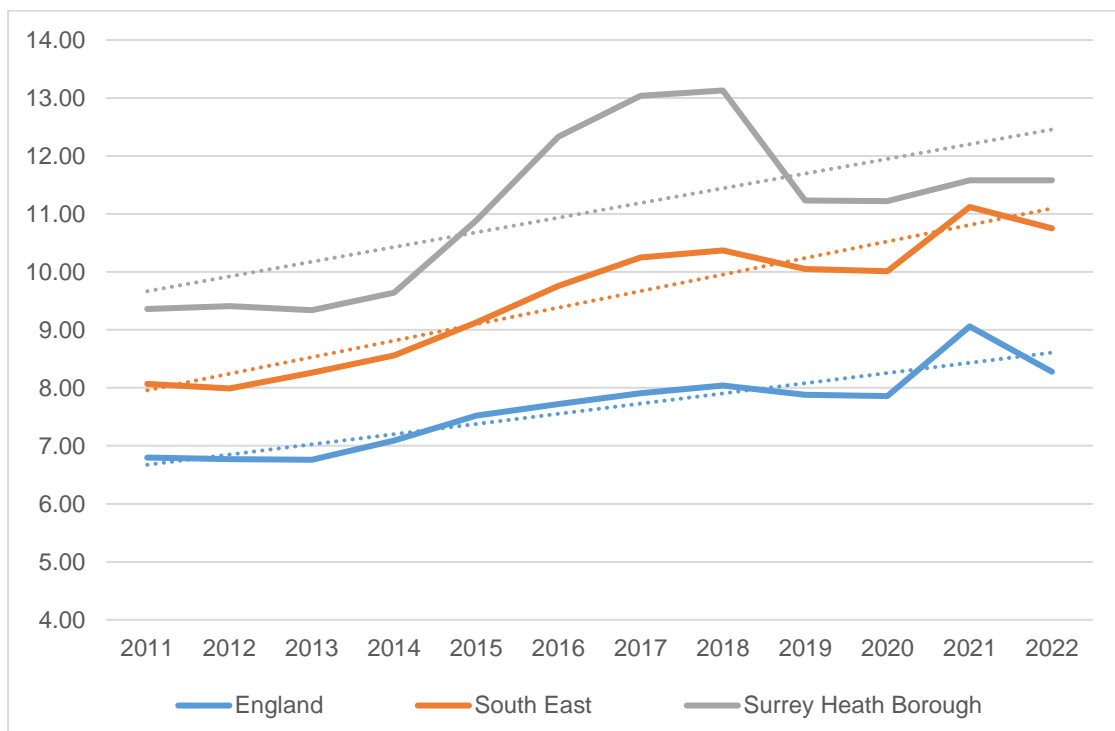
Source: VOA and ONS Private Rental Market Statistics

- 4.37 A lower quartile rent of £850 pcm in 2021/22 is 10% higher than the South East figure of £775 pcm and 43% higher than the national figure of £595 pcm.

Median House Prices

- 4.38 The ratio of median house prices to median incomes in Surrey Heath Borough now stands at 11.58, a 16% increase since the start of the Local Plan period in 2011 where it stood at 9.36.
- 4.39 As demonstrated by Figure 4.5, there is no clear trend of improvement in the affordability ratio, with the linear lines for each area clearly trending upwards.
- 4.40 A ration of 11.58 in Surrey Heath Borough stands significantly above the national average of 8.28 (+40%) and just above the South East average of 10.58 (+9%).

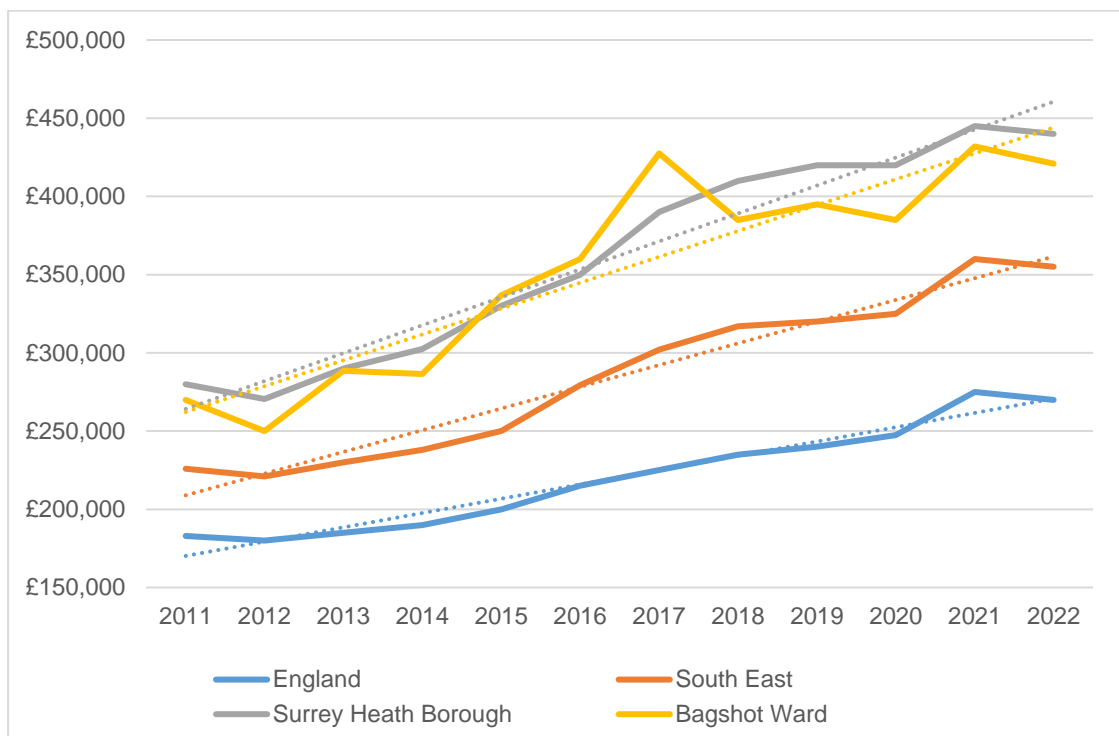
Figure 4.5: Median Workplace-Based Affordability Ratio comparison, 2011 to 2022



Source: ONS Ratio of House Price to Work-place Based Earnings

- 4.41 It is also worth noting that a figure of 8 times average incomes was described as problematic by the former Prime Minister in the foreword to the White Paper entitled – Fixing our broken housing market. Here, the affordability ratio is some 45% higher than that and rising.
- 4.42 Figure 4.6 illustrates the median house sale prices for England, the South East region, Surrey Heath Borough, and Bagshot Ward (where the application site lies).
- 4.43 The median house price in Bagshot Ward has risen by 56% from £270,000 in 2011 to £421,000 in 2022, compared to an 57% increase across Surrey Heath Borough, a 57% increase across the South East region and a 48% increase nationally.
- 4.44 The median house price in Bagshot Ward of £421,000 is just 4% lower than the Surrey Heath average (£440,000). However, the median house price in Bagshot Ward is still 19% higher than the regional average (£355,000) and 56% higher than the national average (£270,000).
- 4.45 House prices in Bagshot Ward and Surrey Heath Borough are much higher than the rest of the region and country further constraining opportunities for first time buyers to purchase a home in this area.

Figure 4.6: Median House Price Comparison, 2011 to 2022

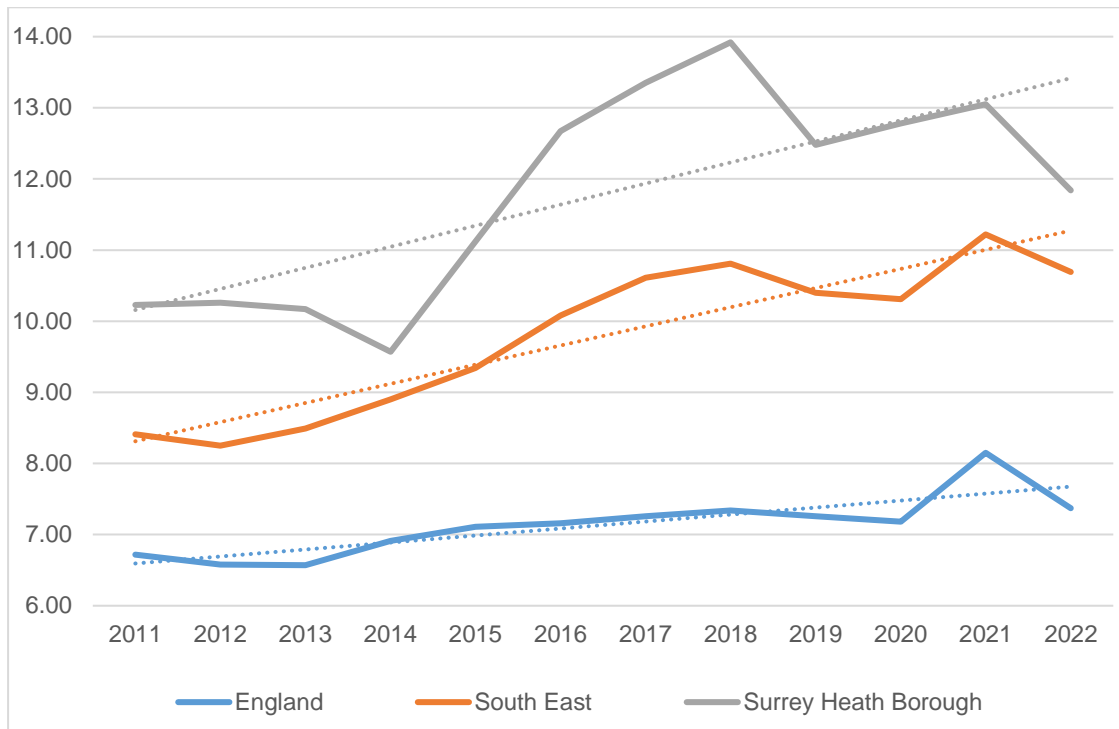


Source: ONS HPSSA Datasets

Lower Quartile House Prices

- 4.46 For those seeking a lower quartile priced property (typically considered to be the ‘more affordable’ segment of the housing market), the ratio of lower quartile house price to incomes in Surrey Heath Borough now stands at 11.84, a 16% increase since the start of the Local Plan period in 2011 where it stood at 10.23.
- 4.47 As demonstrated by Figure 4.7, there is no clear trend of improvement in the affordability ratio, with the linear lines for each area clearly trending upwards.
- 4.48 Once again it remains the case that the ratio in Surrey Heath Borough stands significantly above the national average 7.37 (+61%) and just above the South East average of 10.69 (+11%).

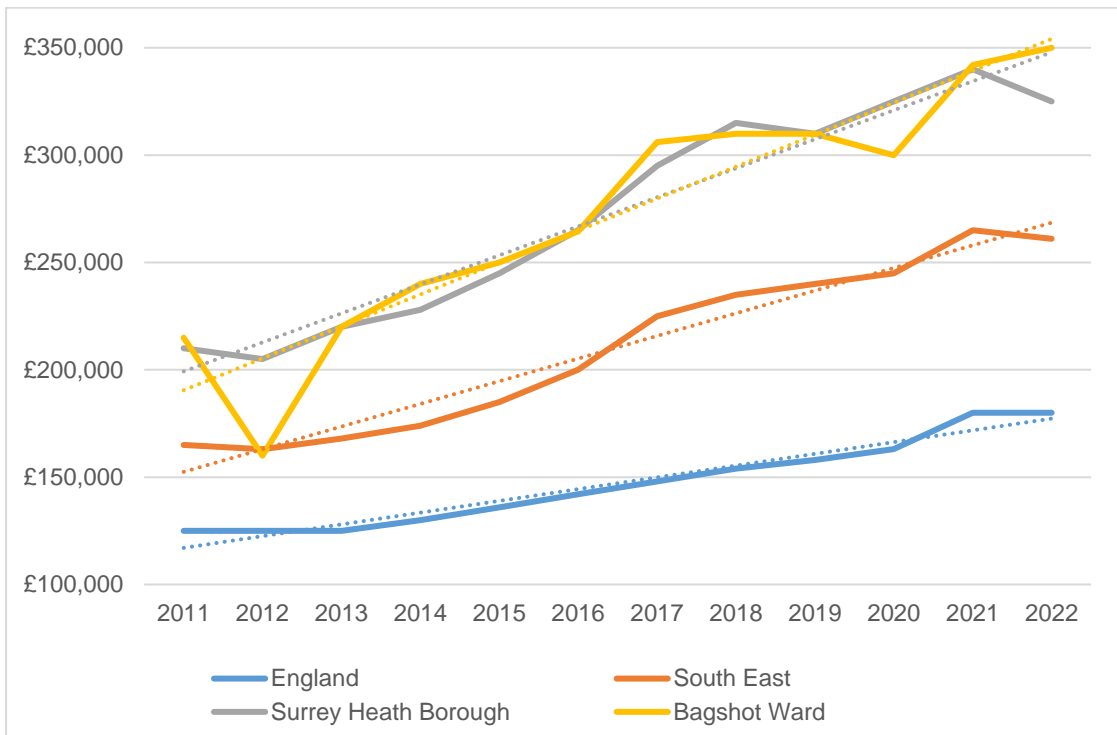
Figure 4.7: Lower Quartile Workplace-Based Affordability Ratio comparison, 2011 to 2022



Source: ONS Ratio of House Price to Work-place Based Earnings

- 4.49 It is also worth noting that mortgage lending is typically offered on the basis of up to 4.5 times earnings (subject to individual circumstances). Here, the affordability ratio is some 157% higher than that and rising.
- 4.50 Figure 4.8 illustrates the lower quartile house sale prices for England, the South East, Surrey Heath and Bagshot Ward. It demonstrates that they have increased dramatically between the start of the Local Plan period in 2011 and 2022.
- 4.51 The lower quartile house price across the Ward has risen by 63% from £215,000 in 2011 to £350,000 in 2022. This compares to a 55% increase across Surrey Heath Borough, a 58% increase across the South East and a national increase of 44% over the same period.
- 4.52 The lower quartile house price of £350,000 in Bagshot Ward is 8% higher than the Surrey Heath Borough average (£325,000), 34% higher than the South East average (£261,000), and 94% higher than the national average (£180,000).

Figure 4.8: Lower Quartile House Prices, 2011 to 2022



Source: ONS HPSSA Datasets

- 4.53 The importance of providing affordable tenures in high value areas for housing was recognised by the Planning Inspector presiding over an appeal at Land at Filands Road/Jenner Lane, Malmesbury, Wiltshire⁸ in January 2022. In considering the provision of affordable housing at the site and the weight to be attached to this provision the Inspector set out the following at paragraphs 78 and 79 of the decision:

“78. The proposed affordable housing would not be as cheap, either to rent or buy, as housing in some other parts of Wiltshire, because Malmesbury is a relatively high value area for housing. However, the housing would meet all policy requirements in terms of amount, mix, and type of provision. Both Appeals A and C would offer affordable housing products as defined by national and local planning policy. I do not diminish the weight to be provided to this provision because such housing might be even cheaper in a theoretical location elsewhere. In fact, that Malmesbury is a relatively high value area for housing adds more weight to the need for affordable housing products.”

79. Evidence has been provided that there is more affordable housing either already provided or committed for Malmesbury than the identified need. However, that need is as identified in a Development Plan that is out-of-date in

⁸ Appeal reference: APP/Y3940/W/21/3278256

*relation to housing, and there is an overall identified shortfall in Wiltshire as a whole. I therefore place **substantial positive weight** on the proposed provision of affordable housing in Appeals A and C. The slightly reduced provision in Appeal C, after taking account of the nursery land, is of no material difference in this regard” (emphasis added).*

Conclusions on Affordability Indicators

- 4.54 As demonstrated through the analysis in this section, affordability across Surrey Heath Borough has been and continues to be, in crisis.
- 4.55 House prices and rent levels in both the average, median and lower quartile segments of the market are increasing whilst at the same time the stock of affordable homes is failing to keep pace with the level of demand. This only serves to push buying or renting in Surrey Heath Borough out of the reach of more and more people.
- 4.56 Analysis of market signals is critical in understanding the affordability of housing. It is my opinion that there is an acute housing crisis in Surrey Heath Borough, with a lower quartile house price to average income ratio of 11.84.
- 4.57 Market signals indicate a worsening trend in affordability in Surrey Heath Borough and within Bagshot Ward. By any measure of affordability, this is an authority in the midst of an affordable housing crisis, and one through which urgent action must be taken to deliver more affordable homes.

Conclusions and Recommendations

Section 5

5.1 Somerston Development Projects Limited propose the development of up to 135 dwellings of which 50% (up to 68 units) will be provided as affordable at Land at Grove End, Bagshot.

5.2 This level of provision exceeds the requirements of adopted Policy CP5 of the Local Plan (35%). As such, the affordable housing represents an 'enhanced' offer when compared with adopted policy expectations.

Affordable Housing Needs and Delivery

5.3 In the 11-year period since the start of the Local Plan period in 2011/12, net affordable housing delivery represented 19% of net overall housing delivery, equating to 39 net affordable dwellings per annum.

5.4 The level of affordable housing delivery is just a fraction of the identified needs of the Borough. When comparative analysis is undertaken against any of the assessments of affordable housing need in the Borough (the SHMA 2014; SHMA 2016; and Housing Needs Assessment 2020), shortfalls have arisen in the provision of affordable housing.

5.5 Against the most recent assessment of need (2020 HNA) a shortfall of -564 affordable dwellings has arisen in the first three years of the period since 2020/21, equivalent to -188 per annum.

5.6 The delivery of up to 68 affordable dwellings would make a significant contribution towards the delivery of affordable housing in Surrey Heath. This scheme alone would equate to more than 26% of Surrey Heath Borough Council's annual affordable housing need of 261 affordable dwellings per annum as set out in the 2020 HNA. The proposal would therefore make a significant contribution to meeting the acute affordable needs in Surrey Heath Borough.

5.7 It is clear that a 'step change' in affordable housing delivery is needed in Surrey Heath Borough to address these shortfalls and ensure that future needs for affordable housing can be met in full.

Affordability in Surrey Heath Borough

5.8 Set out below are the key findings in respect of affordability across Surrey Heath Borough:

Housing Need

- According to the Council's FOI response, of the 347 households on the Housing Register at 31st March 2023, 166 households specified a preference for an affordable home in Bagshot Ward; this represents 48% of the housing register.
- As of 24 March 2023, 630 households are seeking a shared ownership home in Surrey Heath Borough.
- As of 31 March 2022, there were 46 households living in temporary accommodation within Surrey Heath Borough as well as a further 44 households living in Bed and Breakfast accommodation outside the Borough.

Private Rents

- A median private rent of £1,000 pcm in 2021/22 is 5% higher than the South East figure of £950 pcm and 26% higher than the national figure of £795 pcm.
- A lower quartile rent of £850 pcm in 2021/22 is 10% higher than the South East figure of £775 pcm and 43% higher than the national figure of £595 pcm.

House Prices

- A median affordability ratio of 11.58 in Surrey Heath Borough stands significantly above the national average of 8.28 (+40%) and just above the South East average of 10.58 (+9%).
- The median house price in Bagshot Ward of £421,000 is just 4% lower than the Surrey Heath average (£440,000). However, the median house price in Bagshot Ward is still 19% higher than the regional average (£355,000) and 56% higher than the national average (£270,000).
- The lower quartile affordability ratio of 11.84 in Surrey Heath Borough stands significantly above the national average 7.37 (+61%) and just above the South East average of 10.69 (+11%).
- The lower quartile house price of £350,000 in Bagshot Ward is 8% higher than the Surrey Heath Borough average (£325,000), 34% higher than the South

East average (£261,000), and 94% higher than the national average (£180,000).

- 5.9 All these factors combine to create a challenging situation for anybody in need of affordable housing to rent or to buy in Bagshot Ward, and in Surrey Heath Borough more generally.

Conclusions and Very Special Circumstances

- 5.10 In short, house prices and private rents are increasing whilst at the same time the delivery of affordable homes since the start of the Local Plan period has fallen far short of the level of demand. This only serves to push buying or renting in Surrey Heath out of the reach of more and more people. These factors point to a chronic and severe housing crisis across the Borough.

- 5.11 The analysis undertaken by Tetlow King Planning shows that **there is a substantial unmet need for affordable housing across the Surrey Heath Borough Council area.**

- 5.12 Given the affordability crisis in Surrey Heath Borough and the substantial shortfalls in affordable housing delivery against both the 2014 SHMA, 2016 SHMA and 2020 HNA, the benefit of new affordable housing will be significant. The proposed affordable housing is an important part of the case for VSCs to justify the proposed development in the context of paragraph 147 of the NPPF.

- 5.13 The benefits of new affordable housing will be significant. Improving the supply of affordable homes will mean that households needing affordable housing will spend less time on the waiting list and in unsuitable accommodation. This will improve the lives of those real households who will benefit from the provision of high quality, affordable homes that meet their needs.

- 5.14 In summary, the proposed development will:

- Help the Council continue to meet its identified affordable housing need as soon as possible;
- Meet the needs of a wide range of households including those in priority need and those seeking to purchase but who are currently prevented from doing so; and
- Deliver tangible benefits through better housing for real people in real need, now.

- 5.15 **Tetlow King Planning therefore recommends that the proposed development is approved,** to enable the prompt delivery of much-needed affordable housing.

Appendix TKP1

Freedom of Information response 18 June 2023



Freedom of Information Request Below

Can you please provide the following data in line with the provisions of the Freedom of Information Act.

Questions 1 to 9 of this request relate to data held by the Housing Department.

Questions 10 to 13 of this request relate to data held by the Planning Department.

Housing Register

1. The total number of households on the Council's Housing Register at 31 March 2023.
- 347
2. The average waiting times at 31 March 2023 for the following types of affordable property across the Authority:
 - a. 1-bed affordable dwelling; Average not applicable as varies depending on how flexible the applicant is with area and property type, eg. houses attract far more interest than flats and if an applicant is only interested in a house they will wait far longer than somebody who will consider any type of property in any area of the borough.
 - b. 2-bed affordable dwelling; As above
 - c. 3-bed affordable dwelling; As above
 - d. A 4+ bed affordable dwelling. As above
3. The average waiting times at 31 March 2022 for the following types of affordable property across the Authority:
 - e. 1-bed affordable dwelling; Average not applicable as varies depending how flexible the applicant is with area and property type, eg. houses attract far more interest than flats and if an applicant is only interested in a house they will wait far longer than somebody who will consider any type of property in any area of the borough.
 - a. 2-bed affordable dwelling; As above
 - b. 3-bed affordable dwelling; and As above
 - c. A 4+ bed affordable dwelling. As above
4. The total number of households on the Council's Housing Register at 31 March 2023 specifying the following locations as their preferred choice of location:

Location	Household Preferences (31 March 2023)
Bagshot Ward	166

5. The average number of bids per property over the 2022/23 monitoring period for the following types of affordable property in the locations listed below:

Type of affordable property	Average Bids Per Property (1 April 2022 to 31 March 2023)
	Bagshot Ward
1-bed affordable dwelling	22
2-bed affordable dwelling	N/A
3-bed affordable dwelling	26
4+ bed affordable dwelling	N/A

6. Any changes the Council has made to its Housing Register Allocations Policy since 2011 including:

- The date they occurred; [01/08/2020](#)
- What they entailed; [new Allocation Policy launched together with a new Housing Register.](#)
- Copies of the respective documents - [attached](#)

Social Housing Stock

7. The total number of social housing dwelling stock at 31 March 2023 in the following locations:

Location	Total Social Housing Stock (31 March 2023)
Bagshot Ward	323

Social Housing Lettings

8. The number of social housing lettings in the period between 1 April 2021 and 31 March 2022; and between 1 April 2022 and 31 March 2023 in the following locations:

Location	Social Housing Lettings	
	1 April 2021 to 31 March 2022	1 April 2022 to 31 March 2023
Bagshot Ward	17	10

Temporary Accommodation

9. The number of households on the Housing Register housed in temporary accommodation within and outside the Surrey Heath District Council region on the following dates:

Households in Temporary Accommodation	March 2022	March 2023
Households Housed within Surrey Heath District Council	20 (placed between March 2022 and March 2023)	
Households Housed outside Surrey Heath District Council	42 (placed between March 2022 and March 2023)	
Total Households	62 (placed between March 2022 and March 2023)	

Housing Completions

10. The number of NET housing completions in the Surrey Heath District Council region broken down on a per annum basis for the period between 2000/01 and 2022/23.

- 2000/01 - 116 units
- 2001/02 - 131 units
- 2002/03 - 337 units
- 2003/04 - 201 units
- 2004/05 - 143 units
- 2005/06 - 417 units
- 2006/07 - 336 units
- 2007/08 - 119 units
- 2008/09 - 342 units
- 2009/10 - 34 units
- 2010/11 - 44 units
- 2011/12 - 179 units
- 2012/13 - 217 units
- 2013/14 - 127 units
- 2014/15 - 187 units
- 2015/16 - 305 units
- 2016/17 - 226 units
- 2017/18 - 224 units
- 2018/19 - 368 units
- 2019/20 - 376 units
- 2020/21 - 352 units
- 2021/22 - 370 units
- 2022/23 - 403 units

11. The number of NET affordable housing completions in the Surrey Heath District Council region broken down on a per annum basis for the period between 2000/01 and 2022/23. –

11 Pre-2009 data exempt under Section 12 of the Freedom of Information Act. See below (point 1)

2009 data onwards is as follows:

- 2009/10 - 0 affordable units
- 2010/11 - 24 affordable units
- 2011/12 - 74 affordable units
- 2012/13 - 20 affordable units
- 2013/14 - 6 affordable units
- 2014/15 - 0 affordable units
- 2015/16 - 20 affordable units
- 2016/17 - 30 affordable units
- 2017/18 - 36 affordable units
- 2018/19 - 101 affordable units
- 2019/20 - 132 affordable units
- 2020/21 - 39 affordable units
- 2021/22 – 112 affordable units
- 2022/23 - 69 affordable units

12. The number of NET housing completions in Bagshot Ward broken down on a per annum basis for the period between 2000/01 and 2022/23.

Completions are as follows from 2000 - 2023

- 2000/01 - 0 units
- 2001/02 - 3 units
- 2002/03 - 3 units
- 2003/04 - 0 units
- 2004/05 - 9 units
- 2005/06 - 18 units
- 2006/07 - 8 units
- 2007/08 - 0 units
- 2008/09 - 3 units
- 2009/10 – 0 units
- 2010/11 - 28 units
- 2011/12 - 91 units
- 2012/13 - 60 units
- 2013/14 - 5 units
- 2014/15 - 9 units
- 2015/16 - 6 units
- 2016/17 - 6 units
- 2017/18 - 10 units
- 2018/19 – 5 units
- 2019/20 – 0 units
- 2020/21 – 48 units

- 2021/22 - 10 units
- 2022/23 - 138 units

13. The number of NET affordable housing completions in Bagshot Ward broken down on a per annum basis for the period between 2000/01 and 2022/23. –

Pre-2009 data exempt under Section 12 of the Freedom of Information Act. See below (point 1). 2009 data onwards is as follows:

- 2009/10 to 2022 – This information is publicly available. An appendix is included in the annual Authority Monitoring Report that includes a breakdown of applications completed in the monitoring year by location (e.g. appendix 3 of the 2020/21 AMR). The planning application search can be used to search individual applications and the corresponding affordable housing provision, if applicable to the application. The AMRs from 2009 can be found here - <https://www.surreyheath.gov.uk/planning-and-building-control/planning-policy/development-plan/monitoring-local-plan>
- 2021/22 – 0 affordable units
- 2022/23 - 18 affordable units

Exempt information

Section 12 of the Freedom of Information Act makes provision for public authorities to refuse requests for information where the cost of dealing with them would exceed the appropriate limit which for local government is set at £450 (18 hours of work) and applies to

- establishing whether information is held;
- locating and retrieving the information; and
- extracting the relevant information from a document containing it.

1. We estimate that it will take us in excess of this limit to search through historic archived paper records to identify in the first instance if we still hold this information and then time to reconcile any information found such that it would take the cost above the £450 limit.

Glossary of Terms

Housing Register	The housing register is a waiting list of households in a given authority area who are eligible and in need of an affordable home.
Affordable Property	Housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions: <ul style="list-style-type: none"> a) Affordable housing for rent b) Starter Homes c) Discounted market sales housing; and d) Other affordable routes to home ownership.^[1]

^[1] As defined by Annex 2 of the National Planning Policy Framework (2021) which can be viewed [here](#).

Housing Completion	A dwelling is counted as completed when construction has ceased, and it becomes ready for occupation. This includes new build dwellings, conversions, changes of use and redevelopments. Housing completions should be provided as net figures.
Net	Net refers to total (gross) figures minus any deductions (for example, through demolitions).
Monitoring Period	From 1 April in any given calendar year through until 31 March in the following calendar year.
Prevention Duty	The prevention duty applies when a local authority is satisfied that an applicant is threatened with homelessness and eligible for assistance.
Relief Duty	The relief duty applies when a local authority is satisfied that an applicant is homeless and eligible for assistance.
Parish	The smallest unit of local government.
Ward	A division of a city or town, for representative, electoral, or administrative purposes.

^[1] As defined by Annex 2 of the National Planning Policy Framework (2021) which can be viewed [here](#).

Appendix TKP2

Help to Buy Register for Surrey Heath (24 March 2023)



List Extracted From Help to Buy Stakeholder Portal on 24/03/23 (<https://stakeholder.helptobuyagent3.org.uk>) Search criteria = Shared Ownership New Build, Surrey, Surrey Heath Borough

Application	SchemesInterestedIn	LocalAuthorities	Towns
HTB-03050-G0K0B4	Shared Ownership Resales; Shared Ownership New Build	Hart, Runnymede, Rushmoor, Surrey Heath	
HTB-03083-W0J1Q6	Shared Ownership New Build	Bracknell Forest, Rushmoor, Surrey Heath, Woking	
HTB-03976-F4C7G9	Shared Ownership New Build	Basingstoke and Deane, Surrey Heath	Basingstoke, Camberley
HTB-04078-F8K4H6	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Basingstoke and Deane, Reading, Surrey Heath, Windsor and Maidenhead	Camberley
HTB-04710-T3T4R9	Shared Ownership New Build	Surrey Heath	Camberley
HTB-04842-R0S4V9	Shared Ownership Resales; Shared Ownership New Build	Bracknell Forest, Hart, Surrey Heath, Wokingham	
HTB-05014-M4Z2Z7	Shared Ownership New Build	Surrey Heath	
HTB-06330-N2C9H3	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Guildford, Surrey Heath, Woking	Camberley, Ash Vale, St Johns
HTB-06460-G7X0C1	Shared Ownership New Build	Hart, Rushmoor, Surrey Heath	Fleet, Church Crookham, Aldershot, Farnborough, Frimley, Frimley Green
HTB-06532-T6Q0Q3	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Guildford, Hart, Rushmoor, Surrey Heath	Ashford, Fleet
HTB-06604-Q5H2R1	Shared Ownership Resales; Shared Ownership New Build	Rushmoor, Surrey Heath	Camberley, Aldershot, Cove
HTB-06691-X9L9S6	Shared Ownership New Build	Guildford, Hart, Surrey Heath	Camberley, Fleet, Tongham
HTB-06804-R1P5N0	Shared Ownership Resales, Shared Ownership New Build	Rushmoor, Surrey Heath	Aldershot, Frimley
HTB-06907-M6C5H0	Shared Ownership Resales; Shared Ownership New Build	Runnymede, Surrey Heath, West Berkshire	West End
HTB-07075-B2K2J0	Shared Ownership Resales; Shared Ownership New Build	Bracknell Forest, Surrey Heath, Windsor and Maidenhead, Woking	
HTB-07782-Z1N6J8	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Crawley, Epsom and Ewell, Surrey Heath	Epsom
HTB-07812-Z6M7Q5	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Bracknell Forest, Mid Sussex, Surrey Heath	Ascot, East Grinstead, Chobham
HTB-07863-K3M9H7	Shared Ownership Resales; Shared Ownership New Build	Bracknell Forest, Hart, Surrey Heath	Camberley, Crowthorne, Yateley
HTB-07882-P0K0T5	Shared Ownership New Build	Central Bedfordshire, Luton, Surrey Heath	Camberley
HTB-08097-K6V7G4	Shared Ownership New Build	Guildford, Mole Valley, Surrey Heath, Waverley, Woking	
HTB-08198-V1H6Q4	Shared Ownership New Build	Surrey Heath	
HTB-08603-P5X3G7	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Bracknell Forest, East Hampshire, Eastleigh, Elmbridge, Guildford, Runnymede, Rushmoor, Surrey Heath, Winchester, Woking	
HTB-08650-C9Z4C5	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Guildford, Rushmoor, Surrey Heath	
HTB-08780-G9H5P1	Shared Ownership Resales, Shared Ownership New Build, Rent To Buy	Chichester, Runnymede, Surrey Heath, Weymouth and Portland, Windsor and Maidenhead	Chichester, Egham Wick, Virginia Water, Chobham, Weymouth, Datchet, Old Windsor
HTB-09280-S0C2C9	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Epsom and Ewell, Guildford, Surrey Heath, Woking	Bagshot, Woking
HTB-09420-R8C4X3	Shared Ownership New Build	Surrey Heath	Camberley
HTB-09893-Q6Y2K0	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Surrey Heath	
HTB-11151-M9F9D3	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Crawley, Dartford, Maidstone, Sevenoaks, Surrey Heath, Tonbridge and Malling, Tunbridge Wells	
HTB-11230-R9D3V7	Shared Ownership Resales; Shared Ownership New Build	Rushmoor, Surrey Heath	
HTB-11614-T6X8B7	Shared Ownership New Build	Basingstoke and Deane, Surrey Heath	Basingstoke, Windlesham

HTB-11633-Y7L3C2	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Guildford, Hart, Surrey Heath	Ashford, Camberley, Yateley, Fleet, Ash Vale, Normandy, Blackwater, Church Crookham, Crookham Village, Chobham, Frimley, Frimley Green, Lightwater, Mytchett
HTB-12295-B8P7Z4	Shared Ownership New Build	Surrey Heath	Camberley
HTB-12390-M0P1P8	Shared Ownership New Build	Surrey Heath	Camberley
HTB-12598-F5G6G6	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Bracknell Forest, Epsom and Ewell, Surrey Heath	
HTB-12800-H6F1D1	Shared Ownership New Build	Surrey Heath	Deepcut
HTB-13014-T8C7N6	Shared Ownership Resales; Shared Ownership New Build	Bracknell Forest, Reading, Southampton, Surrey Heath	Bracknell, Camberley, Caversham, Southampton, Frimley
HTB-13235-M8L0D6	Shared Ownership New Build	Epsom and Ewell, Horsham, Runnymede, Surrey Heath	
HTB-13440-X3V1B9	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Elmbridge, Reigate and Banstead, Surrey Heath	
HTB-13570-D4F1S0	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Horsham, Reigate and Banstead, Surrey Heath	Warnham
HTB-13694-C8W7W8	Shared Ownership Resales; Shared Ownership New Build	Bracknell Forest, Runnymede, St Albans, Surrey Heath, Watford, Welwyn Hatfield, Buckinghamshire	Bracknell, Hatfield Peverel & Terling
HTB-13778-P7G2R7	Shared Ownership New Build	Slough, Surrey Heath	
HTB-13817-P2N2D0	Shared Ownership Resales; Shared Ownership New Build	Epsom and Ewell, Guildford, Horsham, Medway, Reading, Reigate and Banstead, St Albans, Surrey Heath, Tunbridge Wells, Woking	Epsom Downs
HTB-13833-J7M5K9	Shared Ownership New Build	Surrey Heath	
HTB-13998-T2B4C1	Shared Ownership Resales; Shared Ownership New Build	Rushmoor, Surrey Heath	Camberley, Frimley
HTB-14074-P9M4K3	Shared Ownership New Build	Guildford, Surrey Heath	
HTB-14192-V8J5S8	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath, Waverley	Camberley, Farnham
HTB-14359-T7D1N8	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Basingstoke and Deane, Bracknell Forest, Reading, Rushmoor, Surrey Heath, West Berkshire, Windsor and Maidenhead, Wokingham	
HTB-14385-V9B9Q4	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Bracknell Forest, Epsom and Ewell, Guildford, Reading, Runnymede, Slough, Spelthorne, Surrey Heath, Watford, West Berkshire, Windsor and Maidenhead, Woking, Buckinghamshire	
HTB-14484-K5X3S5	Shared Ownership Resales; Shared Ownership New Build	Rushmoor, Surrey Heath	Camberley, Farnborough
HTB-14569-M7M5N7	Shared Ownership New Build	Surrey Heath	
HTB-14595-L7W2G7	Shared Ownership New Build	Guildford, Surrey Heath	
HTB-14604-J2X0N9	Shared Ownership New Build	Brighton and Hove, Guildford, Surrey Heath, Windsor and Maidenhead	
HTB-15163-H7D8H2	Shared Ownership New Build	Bracknell Forest, Surrey Heath, Windsor and Maidenhead, Wokingham	Binfield, Camberley, Crowthorne, Warfield, Winkfield, Hurst, Maidenhead Riverside, Wokingham
HTB-15173-W7C7J6	Shared Ownership New Build	Surrey Heath	Frimley
HTB-15271-V5Y7S9	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Basingstoke and Deane, East Hampshire, Guildford, Surrey Heath, Woking	Basingstoke, Camberley, Bordon, Guildford, Woking
HTB-15414-C1V2G5	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Guildford, Reading, Runnymede, Slough, Surrey Heath, Thurrock, Watford, West Berkshire, Windsor and Maidenhead, Woking, Wokingham, Buckinghamshire	
HTB-15655-M8M0Q9	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Surrey Heath	
HTB-16202-D4T5P5	Shared Ownership New Build	Bracknell Forest, Surrey Heath, Wokingham	
HTB-16324-M4T3D4	Shared Ownership New Build	Guildford, Surrey Heath, Woking	

HTB-16908-T9SQ06	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Basildon, Chelmsford, East Hertfordshire, Harlow, Luton, Mid Sussex, Milton Keynes, Slough, Surrey Heath, West Berkshire, Windsor and Maidenhead, Wokingham	
HTB-17515-D3X6C0	Shared Ownership New Build	Rushmoor, Surrey Heath	Camberley, Farnborough
HTB-17593-TOQ0D5	Shared Ownership New Build	Surrey Heath	Deepcut
HTB-17663-H6C8V7	Shared Ownership New Build	Surrey Heath	Camberley
HTB-17849-T2J4T5	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Surrey Heath	
HTB-18003-F0D3L7	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Elmbridge, Guildford, Spelthorne, Surrey Heath, Waverley, Woking	
HTB-18115-N3V4D9	Shared Ownership New Build	Surrey Heath	
HTB-18313-V0R1W4	Shared Ownership New Build	Surrey Heath	
HTB-18322-LSK0H0	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Ashford, Elmbridge, Guildford, Runnymede, Surrey Heath	Ashford
HTB-18330-B8LOT4	Shared Ownership New Build	Guildford, Mole Valley, Reigate and Banstead, Surrey Heath	Chobham
HTB-18761-D2S6K0	Shared Ownership New Build	Surrey Heath	Mytchett
HTB-18915-Y8M7L1	Shared Ownership Resales; Shared Ownership New Build	Bracknell Forest, Reading, Surrey Heath, Waverley	Bracknell
HTB-19032-F8T1H1	Shared Ownership New Build	Basingstoke and Deane, Bracknell Forest, Crawley, Elmbridge, Epsom and Ewell, Guildford, Horsham, Mole Valley, Reigate and Banstead, Runnymede, Rushmoor, Surrey Heath, Waverley, Woking	
HTB-19077-J9FOC1	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Ashford, Basingstoke and Deane, Crawley, Eastleigh, Epsom and Ewell, Southampton, Surrey Heath, Tandridge	Ashford, Basingstoke
HTB-19095-Q2M4S2	Shared Ownership New Build	Surrey Heath	
HTB-19246-R1P6N0	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Crawley, Guildford, Horsham, Sevenoaks, Surrey Heath, Woking	
HTB-19250-V1T5C3	Shared Ownership New Build	Surrey Heath	
HTB-19311-V1T6R4	Shared Ownership New Build	Basingstoke and Deane, East Hampshire, Rushmoor, Surrey Heath	Basingstoke, Camberley, Alton Pancras, Bordon , Deepcut, Frimley, Frimley Green, Mytchett
HTB-19555-B2L7J5	Shared Ownership New Build	East Hampshire, Hart, Surrey Heath, Waverley, Wokingham	Hook Norton , Alton Pancras, Bordon , Rushmoor
HTB-19751-J3N4R3	Shared Ownership Resales; Shared Ownership New Build	Bracknell Forest, Guildford, Hart, Rushmoor, Surrey Heath	Camberley, Hawley, Fleet, Tongham, Blackwater, Church Crookham, Eversley, Hartley Wintney
HTB-19927-C8S0F9	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Surrey Heath	Bagshot, Chobham, Deepcut, Lightwater, Windlesham
HTB-20294-M1X2X6	Shared Ownership New Build	Surrey Heath	Deepcut
HTB-20453-Y0S3T4	Shared Ownership New Build	Horsham, Surrey Heath	Camberley
HTB-20462-Q7P2C0	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Crawley, Elmbridge, Epsom and Ewell, Horsham, Mole Valley, Reigate and Banstead, Surrey Heath, Woking	
HTB-20508-Z2B5V6	Shared Ownership New Build	Surrey Heath	
HTB-20516-J4W2Q6	Shared Ownership Resales; Shared Ownership New Build	Bracknell Forest, Rushmoor, Surrey Heath, Woking	
HTB-20572-G1L6R1	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Rushmoor, Surrey Heath	Camberley, Aldershot
HTB-20574-B8M7Y2	Shared Ownership Resales, Shared Ownership New Build	Surrey Heath	West End
HTB-21017-B1R4M3	Shared Ownership New Build	Surrey Heath	Deepcut
HTB-21156-F8Z6M4	Shared Ownership New Build	Guildford, Rushmoor, Surrey Heath, Woking	Ashford
HTB-21707-S5C1X6	Shared Ownership New Build	Epsom and Ewell, Guildford, Horsham, Reigate and Banstead, Surrey Heath	Horsham St. Faith and Newton St. Faith

HTB-21798-J5H0B0	Shared Ownership New Build	Surrey Heath	Camberley
HTB-21921-T9S2F9	Shared Ownership New Build	Surrey Heath	
HTB-22588-S2T5L8	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Bracknell Forest, Epsom and Ewell, Slough, Spelthorne, Surrey Heath	
HTB-22681-C4H9T6	Shared Ownership Resales; Shared Ownership New Build	Bracknell Forest, Guildford, Surrey Heath	
HTB-23137-W1N4H0	Shared Ownership Resales; Shared Ownership New Build	Guildford, Surrey Heath	Ashford, Ash Green, Ash Vale, Deepcut, Frimley Green, Mytchett
HTB-23272-G2L7D8	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Bracknell Forest, Guildford, Hart, Surrey Heath, Waverley, Wokingham	
HTB-23290-S1V2P4	Shared Ownership New Build	Surrey Heath	Camberley
HTB-23620-J7N5Q5	Shared Ownership Resales; Shared Ownership New Build	Guildford, Hart, Rushmoor, Surrey Heath	Camberley, Fleet, Ash Vale, Aldershot, Cove
HTB-23666-X2P0S2	Shared Ownership New Build	Bracknell Forest, Hart, Surrey Heath, Wokingham	Camberley, Sandhurst, Yateley, Wokingham
HTB-24081-T8T8X6	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Bracknell Forest, Hart, Rushmoor, Slough, Surrey Heath, Windsor and Maidenhead, Wokingham	Blackwater
HTB-24102-R6L2W1	Shared Ownership New Build	Bracknell Forest, Surrey Heath	Camberley, Crowthorne
HTB-24190-C1F2W7	Shared Ownership Resales; Shared Ownership New Build	Rushmoor, Surrey Heath	Cove, Frimley
HTB-24314-D5F4G1	Shared Ownership New Build	Hart, Rushmoor, Spelthorne, Surrey Heath	Fleet, Farnborough
HTB-24389-D2Y8N7	Shared Ownership New Build	Surrey Heath	Camberley
HTB-24565-C9D2V9	Shared Ownership New Build	Bracknell Forest, Surrey Heath, Buckinghamshire	
HTB-24628-X9Q9L2	Shared Ownership New Build	Surrey Heath, Wokingham	Bagshot, Frimley, Frimley Green, Wokingham
HTB-25029-L9T3Z7	Shared Ownership New Build	Hart, Surrey Heath, Woking	Camberley, Blackwater, Horsell
HTB-25363-X6R5L5	Shared Ownership New Build	Guildford, Surrey Heath	
HTB-25380-M4J0K7	Shared Ownership New Build	Surrey Heath	Camberley
HTB-25414-H5Q2M1	Shared Ownership New Build	Surrey Heath	Camberley
HTB-25868-H2R9D0	Shared Ownership Resales; Shared Ownership New Build	Ashford, Guildford, Horsham, Reading, Slough, Surrey Heath, Watford, Wokingham	Ashford
HTB-25904-V2N3Y9	Shared Ownership New Build	Rushmoor, Surrey Heath, Waverley	Farnham
HTB-25959-Z9F3Y9	Shared Ownership New Build	Runnymede, Surrey Heath, Woking	
HTB-26537-D1C0S4	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Hart, Rushmoor, Surrey Heath	Fleet
HTB-26629-R5P3T2	Shared Ownership Resales; Shared Ownership New Build	Hart, Surrey Heath, Wokingham	Camberley, Fleet, Arborfield
HTB-26650-F4X9K4	Shared Ownership New Build	Bracknell Forest, Surrey Heath, Wokingham	Wokingham
HTB-26712-M6C9T7	Shared Ownership New Build	Surrey Heath	Frimley
HTB-26920-X0B7R0	Shared Ownership New Build	Surrey Heath	Camberley
HTB-27194-K6Y7F6	Shared Ownership New Build	Bracknell Forest, Surrey Heath, Waverley, Wokingham	Cranleigh
HTB-27754-C2V6L1	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Dacorum, Surrey Heath, Three Rivers, Tunbridge Wells, Buckinghamshire	
HTB-27917-L3Z6X1	Shared Ownership Resales; Shared Ownership New Build	Basingstoke and Deane, East Hampshire, New Forest, Rushmoor, Surrey Heath	
HTB-28057-P9V5D0	Shared Ownership Resales; Shared Ownership New Build	Bracknell Forest, Surrey Heath, Wokingham	
HTB-28071-S1H5Y3	Shared Ownership Resales; Shared Ownership New Build	Bracknell Forest, Elmbury, Epsom and Ewell, Guildford, Runnymede, Spelthorne, Surrey Heath, Woking	
HTB-28083-C6W9C6	Shared Ownership New Build	Surrey Heath	
HTB-28341-X7N9J7	Shared Ownership New Build	Rushmoor, Surrey Heath, Waverley	Camberley, Aldershot, Godalming
HTB-28385-N2R8Z8	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Bedford, Dartford, Horsham, Maidstone, Reading, Surrey Heath, Swindon	

HTB-28632-S0V2P1	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Ashford, Epsom and Ewell, Maidstone, Surrey Heath, Thanet	
HTB-29128-FOK9F3	Shared Ownership New Build	Epsom and Ewell, Surrey Heath	
HTB-29148-S9F6C0	Shared Ownership New Build	Basingstoke and Deane, Surrey Heath	Popley, Camberley
HTB-29246-Z7F1G4	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath	Camberley
HTB-29344-Q5P5L8	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Surrey Heath, Windsor and Maidenhead	Deepcut, Frimley Green, Cookham, Pinkneys Green
HTB-29659-F4K7H6	Shared Ownership New Build	Surrey Heath	Frimley
HTB-29767-Q5K6K8	Shared Ownership New Build	Surrey Heath	
HTB-29819-B8D6L6	Shared Ownership Resales; Shared Ownership New Build	Bracknell Forest, Surrey Heath	
HTB-29830-Q9T3T2	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Surrey Heath	Old Dean
HTB-29975-Y5F9N7	Shared Ownership New Build	Surrey Heath	
HTB-30005-Z5V4V1	Shared Ownership Resales; Shared Ownership New Build	Bracknell Forest, Guildford, Surrey Heath, Waverley, Windsor and Maidenhead, Wokingham, Buckinghamshire	Alfold
HTB-30136-R6Y5J2	Shared Ownership New Build	Rushmoor, Surrey Heath	
HTB-30193-Y6J9H5	Shared Ownership Resales; Shared Ownership New Build	Spelthorne, Surrey Heath	Camberley
HTB-30283-S8D6W3	Shared Ownership Resales; Shared Ownership New Build	Bracknell Forest, Surrey Heath	Bracknell, Camberley
HTB-30533-Y8B7Q9	Shared Ownership Resales; Shared Ownership New Build	East Hampshire, Surrey Heath, Waverley	Liphook, Hindhead
HTB-30605-W7R0J9	Shared Ownership New Build	Guildford, Surrey Heath	Bagshot, Ash Vale, Shackleford
HTB-30607-X5W0F8	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Surrey Heath	West End
HTB-30645-G7H5P8	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Guildford, Surrey Heath, Woking	
HTB-30982-Y9X2L9	Shared Ownership New Build	Hart, Rushmoor, Surrey Heath	Farnborough
HTB-31016-B9Y5B4	Shared Ownership Resales; Shared Ownership New Build	Bedford, Guildford, Surrey Heath	
HTB-31473-J6Y1Q7	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Epsom and Ewell, Guildford, Surrey Heath, Tunbridge Wells, Wokingham	
HTB-31588-D2P4N9	Shared Ownership New Build	Rushmoor, Surrey Heath, Waverley	Camberley, Farnham, Farnborough
HTB-31736-Z7J2W3	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath	Camberley
HTB-32002-Y8H8F1	Shared Ownership Resales; Shared Ownership New Build	Hart, Rushmoor, Surrey Heath	Camberley, Yateley, Hawley, Fleet, Coveney, Blackwater, Farnborough, Frimley, Frimley Green, Mytchett
HTB-32159-K5G3C0	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath	Camberley, West End, Frimley, Frimley Green
HTB-32295-V6V1G7	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Bournemouth Christchurch & Poole, Bracknell Forest, East Hampshire, Elmbridge, Guildford, New Forest, Southampton, Surrey Heath, Wiltshire	
HTB-32345-L1S9J4	Shared Ownership New Build	Surrey Heath	West End
HTB-35881-T3H3C5	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath	
HTB-36103-J4X9H7	Shared Ownership New Build	Epsom and Ewell, Surrey Heath	Epsom
HTB-36109-W6P6Z3	Shared Ownership Resales; Shared Ownership New Build	Epsom and Ewell, Guildford, Reigate and Banstead, Surrey Heath	
HTB-36424-D1Y0Y2	Shared Ownership New Build	Guildford, Hart, Rushmoor, Surrey Heath, Waverley	
HTB-36714-F7D8P4	Shared Ownership New Build	Elmbridge, Epsom and Ewell, Surrey Heath	Ewell Minnis, Hinchley Wood, Thames Ditton, Stoneleigh, Chobham
HTB-36795-L8X4D8	Shared Ownership New Build	Reigate and Banstead, Surrey Heath	Reigate
HTB-36847-H7D8F1	Shared Ownership Resales; Shared Ownership New Build	Dartford, Gravesham, Surrey Heath, Woking, Wokingham	
HTB-36887-J4H4H0	Shared Ownership New Build	Bracknell Forest, Surrey Heath, Swindon, Wokingham	
HTB-36924-W1N5T0	Shared Ownership New Build	Surrey Heath	Chobham

HTB-36960-R8B4F7	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Surrey Heath	
HTB-37028-Q0N6Z5	Shared Ownership Resales; Shared Ownership New Build	Hart, Rushmoor, Surrey Heath, Waverley, Wokingham	
HTB-37118-M7T9X2	Shared Ownership New Build	Epsom and Ewell, Guildford, Reigate and Banstead, Surrey Heath, Buckinghamshire	
HTB-37169-B1P8J4	Shared Ownership New Build	Bracknell Forest, Surrey Heath, Waverley, Wokingham	Bagshot, Bracknell, Camberley, Haslemere, Farnham, Milford on Sea, Windlesham, Cranleigh, Godalming, Loxhill, Arborfield, Barkham, Wargrave, Winnersh, Wokingham
HTB-37332-Z0R0S8	Shared Ownership New Build	Epsom and Ewell, Runnymede, Surrey Heath	
HTB-37447-P9J2N6	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Cambridge, East Hampshire, Epsom and Ewell, Guildford, Milton Keynes, Oxford, Portsmouth, Reading, Reigate and Banstead, St Albans, Surrey Heath, Watford	
HTB-37623-B2C5G3	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Basingstoke and Deane, Guildford, Reading, Reigate and Banstead, Rushmoor, Surrey Heath, Woking	
HTB-37741-L7H6C1	Shared Ownership New Build	Surrey Heath, Waverley	Camberley, Farnham, Godalming
HTB-37829-S7F8C1	Shared Ownership New Build	Surrey Heath	
HTB-38070-H7H7Z2	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath	Camberley, West End, Deepcut, Frimley, Frimley Green
HTB-38228-M5R4Y5	Shared Ownership Resales, Shared Ownership New Build, Rent To Buy	Basingstoke and Deane, Bracknell Forest, Surrey Heath, West Berkshire, Wokingham	Basingstoke, Bracknell, Camberley, Crowthorne, Farnborough, Lightwater, Wokingham
HTB-38357-B5J8W9	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Surrey Heath	Lightwater
HTB-38955-Z2X6Q5	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Guildford, Rushmoor, Surrey Heath	Ashford, Ash Green, Ash Vale, Normandy, Tongham, Aldershot, Farnborough, Mytchett
HTB-39074-B0H5M1	Shared Ownership New Build	Surrey Heath	Camberley, Frimley, Mytchett
HTB-39214-M6Q1D8	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Bracknell Forest, Elmbridge, Runnymede, Spelthorne, Surrey Heath, Woking	
HTB-39316-C6V8N2	Shared Ownership Resales; Shared Ownership New Build	Basingstoke and Deane, Guildford, Hart, Rushmoor, Surrey Heath, Waverley	Basingstoke, Camberley, Hook Norton, Farnham, Fleet, West Clandon, Aldershot, Farnborough
HTB-39370-B5R7S3	Shared Ownership New Build	Surrey Heath, Wokingham	Bagshot, Frimley Green, Arborfield
HTB-40313-Q7W4B4	Shared Ownership Resales, Shared Ownership New Build	Elmbridge, Guildford, Surrey Heath	
HTB-40339-K6H0C2	Shared Ownership Resales; Shared Ownership New Build	Bracknell Forest, Hart, Surrey Heath	Bracknell, Camberley, Hawley
HTB-40470-N7Z3F8	Shared Ownership New Build	Surrey Heath	
HTB-40583-N3V2J7	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Epsom and Ewell, Mole Valley, Rushmoor, Surrey Heath	Leatherhead, Aldershot
HTB-40727-V2Q6L1	Shared Ownership New Build	Surrey Heath	Frimley
HTB-40737-N4Q2G9	Shared Ownership New Build	Hart, Surrey Heath	Fleet, Blackwater
HTB-40762-M2V0Z5	Shared Ownership New Build	Runnymede, Surrey Heath	Camberley, Chertsey, New Haw
HTB-40909-W0M1K4	Shared Ownership New Build	Surrey Heath	
HTB-41020-T9K1P3	Shared Ownership Resales; Shared Ownership New Build	Brighton and Hove, Mole Valley, Reading, Surrey Heath, West Berkshire	
HTB-41805-K5X4N7	Shared Ownership Resales; Shared Ownership New Build	Brighton and Hove, Epsom and Ewell, Guildford, Surrey Heath	
HTB-42120-T0S3N6	Shared Ownership New Build; Rent To Buy	Basingstoke and Deane, Bracknell Forest, Epsom and Ewell, Reading, Surrey Heath, Windsor and Maidenhead	
HTB-42274-R6Q1G1	Shared Ownership Resales; Shared Ownership New Build	Basingstoke and Deane, Hart, Surrey Heath	Basingstoke, Hook, Deepcut

		Basingstoke and Deane, Bracknell Forest, Guildford, Harlow, Horsham, Milton Keynes, Mole Valley, Reading, Reigate and Banstead, Slough, South Oxfordshire, St Albans, Surrey Heath, Watford, Welwyn Hatfield, Windsor and Maidenhead, Woking, Wokingham	
HTB-42621-C1G4R3	Shared Ownership Resales; Shared Ownership New Build		
HTB-42693-L1L0Y3	Shared Ownership New Build	Dartford, Epsom and Ewell, Surrey Heath	Dartford, Epsom
HTB-42986-S3Z5J8	Shared Ownership New Build	Guildford, Rushmoor, Spelthorne, Surrey Heath, Waverley	
HTB-43145-B4G0V4	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Bracknell Forest, Surrey Heath	
HTB-43422-M7F8C9	Shared Ownership New Build	Surrey Heath	Windlesham
HTB-43510-P3Y4Z5	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath	
HTB-43555-C8K6B1	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Runnymede, Surrey Heath	
HTB-43848-P3M3P5	Shared Ownership New Build	Surrey Heath	
HTB-44036-B9D5N6	Shared Ownership New Build	Surrey Heath	Deepcut
HTB-44043-B1S1K1	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Guildford, Rushmoor, Surrey Heath	Send, Cove, Deepcut, Frimley, Mytchett
HTB-44160-F9D5W3	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Bracknell Forest, Surrey Heath, Windsor and Maidenhead, Wokingham	
HTB-44475-P9Q1L2	Shared Ownership New Build	Basingstoke and Deane, Bracknell Forest, Guildford, Surrey Heath, Test Valley	
HTB-44680-S3Y2V1	Shared Ownership New Build	Surrey Heath	Chobham
HTB-45216-X7K8P9	Shared Ownership New Build	Surrey Heath, Watford	Camberley
HTB-46080-G4S0T3	Shared Ownership New Build; Rent To Buy	Bracknell Forest, Guildford, Surrey Heath, Windsor and Maidenhead, Wokingham	
HTB-46143-F9L8H9	Shared Ownership New Build	Surrey Heath	Windlesham
HTB-46300-K7T4M4	Shared Ownership New Build	Surrey Heath	
HTB-46632-K1K9G8	Shared Ownership Resales; Shared Ownership New Build	Bracknell Forest, Guildford, Reading, Surrey Heath, Swindon, West Berkshire, Wokingham	
HTB-46849-F9C2L2	Shared Ownership New Build	Bracknell Forest, Surrey Heath, Wokingham	Bracknell, Frimley, Wokingham
HTB-46985-C8C6K3	Shared Ownership New Build	Crawley, Guildford, Surrey Heath	
HTB-47077-D3D0J9	Shared Ownership New Build	Elmbridge, Surrey Heath, Woking	Walton on Thames
HTB-47505-P1F8V1	Shared Ownership Resales, Shared Ownership New Build	Bracknell Forest, Oxford, Surrey Heath, Windsor and Maidenhead, Wokingham	Binfield, Camberley, Oxford, Datchet, Shinfield, Winnersh, Wokingham
HTB-47601-Q2J6D5	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath	Chobham
HTB-48521-W3V5Y1	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath	Camberley
HTB-48686-L2Y2P1	Shared Ownership New Build	Surrey Heath	Camberley
HTB-48720-G8K4K0	Shared Ownership Resales, Shared Ownership New Build, Rent To Buy	Guildford, Hart, Surrey Heath	Camberley, Yateley, Fleet, Ash Vale, Normandy, Pirbright, Send, Tongham, Worplesdon, Church Crookham, Eversley, Hartley Wintney, North Warnborough, Odiham, Chobham, Deepcut, Frimley Green, Lightwater, Windlesham
HTB-49006-S3M3G0	Shared Ownership Resales; Shared Ownership New Build	Rushmoor, Surrey Heath	Camberley, Aldershot, Cove, Frimley
HTB-49366-V0Q5L1	Shared Ownership Resales, Shared Ownership New Build, Rent To Buy	Guildford, Surrey Heath, Waverley	Farnham, Ash Green, Ash Vale, Mytchett, Badshot Lea, Wrecclesham
HTB-49368-T7K1M0	Shared Ownership Resales; Shared Ownership New Build	Bracknell Forest, Elmbridge, Runnymede, Surrey Heath, Woking, Wokingham	Binfield, Bracknell, Camberley, Walton on Thames, Chertsey, Egham Wick, Windlesham, Woking, Arborfield, Winnersh, Wokingham

HTB-49619-Q6H8W0	Shared Ownership Resales; Shared Ownership New Build	Bracknell Forest, Guildford, Runnymede, Surrey Heath, Windsor and Maidenhead, Wokingham	Crowthorne, West End, Guildford, Chertsey, Row Town, Thorpe, Virginia Water, Lightwater, Windlesham, Old Windsor, Wokingham
HTB-49820-D4P0D5	Shared Ownership Resales; Shared Ownership New Build	Guildford, Hart, Surrey Heath	Camberley, Ash Vale, Church Crookham, Deepcut, Lightwater, Mytchett
HTB-50297-D6M8N9	Shared Ownership New Build	Surrey Heath	Camberley
HTB-51083-T5G4H4	Shared Ownership New Build	Surrey Heath	Camberley
HTB-51129-K4H3T0	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Elmbridge, Epsom and Ewell, Surrey Heath, Woking	Esher, Epsom, Chobham, Woking
HTB-51404-J1Y1S4	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Basingstoke and Deane, Bracknell Forest, East Hampshire, Guildford, Hart, Reading, Runnymede, Rushmoor, Surrey Heath, Test Valley, Waverley, West Berkshire	Basingstoke, Chineham, Cliddesden, Hatch Warren, Highclere, Kingsclere, Old Basing, Overton, Popley, Sherborne St John, Sheffield on Loddon, Tadley, Woolton Hill, Ascot, Binfield, Bracknell, Camberley, Crowthorne, Warfield, Winkfield, Yateley, West Green, Hawley, Farnham, Fleet, Beech, East Worldham, Lower Froyle, Upper Froyle, West End, Ash Green, Ash Vale, Tongham, Blackwater, Church Crookham, Cricket Hill, Crondall, Crookham Village, Eversley, Frogmore, Greywell, Hartley Wintney, Hook, Mattingley, North Warnborough, Odiham, Phoenix Green, Rotherwick, Caversham, Caversham Heights, Caversham Park, Coley, Coley Park, Emmer Green, Southcote, Whitley, Whitley Wood, Addlestone, Bishops Gate, Chertsey, Coopers Hill, Egham Wick, Englefield Green, Longcross, Lyne, Meadowland, New Haw, Ottershaw, Row Town, Stroude, Thorpe, Thorpe Lea, Trumps Green, Virginia Water, Woodham, Aldershot, Cove, Bisley, Chobham, Deepcut, Frimley, Frimley Green, Lightwater, Mytchett, Old Dean, Windlesham, Andover, Wrecclesham, Newbury, Pangbourne, Theale, Tidmarsh, Tilehurst
HTB-51666-G0T1Y8	Shared Ownership New Build; Rent To Buy	Surrey Heath	Camberley
HTB-51810-X4B7M0	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Bracknell Forest, Hart, Surrey Heath, West Berkshire, Wokingham	Camberley, Crowthorne, Yateley, Farnborough, Arborfield, Barkham, Finchampstead, Shinfield, Spencers Wood, Three Mile Cross, Winnersh, Wokingham
HTB-52071-V2N2H7	Shared Ownership Resales; Shared Ownership New Build	Basingstoke and Deane, Rushmoor, Surrey Heath	Basingstoke, Cove, Frimley Green
HTB-52293-G4L2F5	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath	Frimley Green
HTB-52525-R0K8L4	Shared Ownership New Build; Rent To Buy	Surrey Heath	Camberley
HTB-52879-L1T6Z8	Shared Ownership New Build	Basingstoke and Deane, Bracknell Forest, Rushmoor, Surrey Heath, Wokingham	Chineham, Sherborne St John, Camberley, Warfield, Aldershot, Cove, Frimley, Frimley Green, Finchampstead, Wokingham
HTB-53002-D2P7V1	Shared Ownership New Build	Guildford, Surrey Heath, Woking	Camberley, West End, Guildford, Bisley, Chobham, Deepcut, Frimley, Lightwater, Mytchett, Windlesham, Woking
HTB-54031-W1S9W8	Shared Ownership Resales; Shared Ownership New Build	Hart, Surrey Heath	Camberley, Yateley, Hawley, Fleet, Church Crookham, Hook, Deepcut
HTB-54504-Q5B4P3	Shared Ownership Resales; Shared Ownership New Build	Guildford, Hart, Rushmoor, Surrey Heath	Tongham, Church Crookham, Aldershot, Frimley
HTB-54753-Q4C9Z7	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Surrey Heath	Old Dean
HTB-55579-H5M1Z6	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath	Camberley

HTB-56466-W0G7C7	Shared Ownership New Build	Bracknell Forest, Surrey Heath	Crowthorne, Frimley
HTB-57753-B4S1S3	Shared Ownership Resales; Shared Ownership New Build	Hart, Surrey Heath	Camberley, Blackwater
HTB-58174-H4G2C6	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Hart, Surrey Heath, Wokingham	Camberley, Yateley, Hawley, Deepcut, Frimley, Lightwater, Finchampstead, Wokingham, Woodley
HTB-58517-Q9S7V3	Shared Ownership Resales; Shared Ownership New Build	Bracknell Forest, Hart, Surrey Heath	Ascot, Fleet, Chobham, Lightwater, Windlesham
HTB-58615-T6Y6B0	Shared Ownership Resales; Shared Ownership New Build	Rushmoor, Surrey Heath	Aldershot, Mytchett
HTB-59145-Q1T0S2	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath	Windlesham
HTB-62505-B6V8B2	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Surrey Heath	Camberley
HTB-62667-H4M4D7	Shared Ownership Resales; Shared Ownership New Build	Elmbridge, Mole Valley, Runnymede, Surrey Heath, Tandridge	Weybridge, Leatherhead, Longcross, Chobham, Lingfield
HTB-64749-V6W9R8	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Epsom and Ewell, Guildford, Rushmoor, Surrey Heath	Camberley, Epsom, Guildford, Aldershot, Cove
HTB-64950-K5T0R3	Shared Ownership New Build	Guildford, Rushmoor, Surrey Heath, Waverley	Farnham, Ash Vale, Tongham, Aldershot, Frimley
HTB-65170-T8X5P3	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Basingstoke and Deane, Bracknell Forest, Surrey Heath, Vale of White Horse, West Berkshire	Basingstoke, Bracknell, Hermitage, Bisley, Wantage, Newbury
HTB-65206-B8V0R3	Shared Ownership Resales; Shared Ownership New Build	Bracknell Forest, Rushmoor, Surrey Heath	Bracknell, Camberley, Cove
HTB-65327-V5C6Z2	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Guildford, Surrey Heath, Woking	Pirbright, St Johns, Bisley, Brookwood, Goldsworth
HTB-65486-J0N1D0	Shared Ownership New Build; Rent To Buy	Guildford, Hart, Surrey Heath	Camberley, Ash Vale, Crookham Village
HTB-65618-D5T3L4	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath	Bisley
HTB-66641-X7R5X4	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Elmbridge, Guildford, Runnymede, Surrey Heath, Woking	Park, Walton on Thames, Weybridge, Guildford, Worplesdon, Addlestone, Chertsey, Longcross, Virginia Water, Chobham, Hook Heath, Horsell, Sutton Green, Westfield West Byfleet, Woking
HTB-66830-L3N1G6	Shared Ownership New Build	Surrey Heath	Camberley
HTB-67404-G5B5K3	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath	Camberley
HTB-68410-N4N1V0	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Guildford, Hart, Surrey Heath	Camberley, Hawley, West End, Ash Green, Ash Vale, Deepcut, Frimley Green, Lightwater, Mytchett
HTB-69300-G1Z7N2	Shared Ownership New Build; Rent To Buy	Surrey Heath	West End
HTB-69683-K9T8K8	Shared Ownership Resales; Shared Ownership New Build	Hart, Rushmoor, Surrey Heath	Camberley, Fleet, Blackwater, Church Crookham, Cove, Frimley
HTB-69869-Y0W6S9	Shared Ownership Resales; Shared Ownership New Build	Rushmoor, Surrey Heath	Aldershot, Cove, Frimley
HTB-71499-L7N7Z0	Shared Ownership New Build	Elmbridge, Guildford, Surrey Heath, Waverley, Woking	Thames Ditton, Effingham, Lightwater, Cranleigh, Woking
HTB-71633-B5X4Z5	Shared Ownership Resales; Shared Ownership New Build	Rushmoor, Surrey Heath	Camberley, Aldershot
HTB-71712-L7K9M0	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Elmbridge, Guildford, Mole Valley, Runnymede, Surrey Heath, Woking	Camberley, Oxshott, Jacobs Well, Fetcham, New Haw, Woking
HTB-71740-P8S0W4	Shared Ownership New Build	Rushmoor, Surrey Heath	Camberley, Aldershot
HTB-71858-D2T4B3	Shared Ownership Resales; Shared Ownership New Build	Hart, Rushmoor, Surrey Heath	Camberley, Yateley, Hawley, Fleet, Blackwater, Church Crookham, Frogmore, Aldershot, Cove, Frimley, Frimley Green
HTB-71987-M5Y8Z4	Shared Ownership New Build	Guildford, Rushmoor, Surrey Heath, Woking	Ash Vale, Cove, Frimley, Brookwood
HTB-72347-G5P9J1	Shared Ownership Resales; Shared Ownership New Build	Guildford, Hart, Surrey Heath, Waverley	Camberley, Fleet, Guildford, Cranleigh
HTB-72710-L9Z8R4	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath	Frimley Green
HTB-72762-X9Z9P6	Shared Ownership Resales; Shared Ownership New Build; Extra Care Older Persons Shared Ownership	Surrey Heath	Windlesham
HTB-73218-K1J5P8	Shared Ownership Resales; Shared Ownership New Build	Rushmoor, Surrey Heath	Aldershot, Cove, Frimley, Mytchett
HTB-73831-Q8Q1B6	Shared Ownership Resales; Shared Ownership New Build	Guildford, Surrey Heath	Ash Green, Frimley Green

HTB-73952-W7N6N2	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Central Bedfordshire, Crawley, Eastbourne, Epping Forest, Epsom and Ewell, Sevenoaks, South Cambridgeshire, Surrey Heath, Tonbridge and Malling	Leighton Buzzard, East Dean, Pound Hill South, West End, Epping, Epsom Downs, Swanley, West Wickham, Beltring
HTB-74223-POV7T6	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Rushmoor, Surrey Heath	Camberley, Cove
HTB-74923-G3L8X3	Shared Ownership New Build	Surrey Heath	West End
HTB-75615-F7M9R7	Shared Ownership Resales; Shared Ownership New Build	Basingstoke and Deane, Bracknell Forest, Surrey Heath	Basingstoke, Bracknell, Camberley
HTB-76016-S3J7B7	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath	Camberley
HTB-76075-Y0F3V7	Shared Ownership Resales, Shared Ownership New Build	Surrey Heath	Camberley
HTB-76278-F1T2H6	Shared Ownership Resales; Shared Ownership New Build	Runnymede, Surrey Heath, Woking	Camberley, Chertsey, Woking
HTB-76662-T7Q5B9	Shared Ownership Resales, Shared Ownership New Build, Home Ownership People with Long Term Disabilities	Guildford, Surrey Heath, Woking	Send, Chobham, Brookwood
HTB-77344-Y1B5Z3	Shared Ownership New Build, Rent To Buy, Extra Care Older Persons Shared Ownership	Rushmoor, Surrey Heath, Wiltshire	Aldershot, Mytchett, Tidworth
HTB-78049-W5X3S0	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Surrey Heath	Bisley
HTB-78318-S0S3N6	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath	Camberley, West End, Chobham, Frimley, Lightwater
HTB-78473-R8N0V3	Shared Ownership Resales; Shared Ownership New Build	Bracknell Forest, Hart, Surrey Heath, Wokingham	Camberley, Crowthorne, Yateley, Wokingham
HTB-78966-J6H0T1	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath	Deepcut
HTB-79019-K9X4T6	Shared Ownership Resales; Shared Ownership New Build	Rushmoor, Surrey Heath	Camberley, Cove
HTB-79294-Y5N6L3	Shared Ownership Resales, Shared Ownership New Build	Bracknell Forest, Surrey Heath, Wokingham	Bracknell, Camberley, Wokingham
HTB-79359-F9J7N0	Shared Ownership Resales, Shared Ownership New Build, Rent To Buy	Surrey Heath	Camberley
HTB-79399-G0L1L1	Shared Ownership New Build	Surrey Heath	Camberley, Frimley, Frimley Green, Windlesham
HTB-79409-C4L2C4	Shared Ownership New Build	Surrey Heath	Camberley
HTB-79514-P4F7R5	Shared Ownership Resales, Shared Ownership New Build, Rent To Buy	Surrey Heath	Camberley, Chobham, Lightwater, Windlesham
HTB-79710-K7Z3W2	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Surrey Heath	Frimley
HTB-79967-J3V0Y9	Shared Ownership Resales; Shared Ownership New Build	Elmbridge, Epsom and Ewell, Reigate and Banstead, Runnymede, Spelthorne, Surrey Heath, Tandridge	Esher, Oxshott, Walton on Thames, Epsom, Langley Vale, Banstead, Nork, Chertsey, Sunbury on Thames, Chobham, Bletchingley, Godstone
HTB-80639-W1T1G4	Shared Ownership Resales, Shared Ownership New Build, Rent To Buy	Guildford, Hart, Rushmoor, Surrey Heath, Waverley	Camberley, Farnham, Fleet, Ash Vale, Aldershot
HTB-80707-F3T6V9	Shared Ownership Resales, Shared Ownership New Build	Runnymede, Spelthorne, Surrey Heath, Windsor and Maidenhead	Ashford, Addlestone, Chertsey, Egham Wick, Englefield Green, Lyne, Ottershaw, Stains, Thorpe, Shepperton, Chobham, Frimley, Lightwater, Old Windsor
HTB-81570-K2V6P3	Shared Ownership New Build; Rent To Buy	Surrey Heath	Camberley
HTB-82270-D5V8P7	Shared Ownership Resales, Shared Ownership New Build, Rent To Buy	Bracknell Forest, Surrey Heath	Crowthorne, West End
HTB-82539-N9T0T7	Shared Ownership Resales; Shared Ownership New Build	East Hampshire, Surrey Heath	Liphook, Frimley
HTB-83085-K8R8K1	Shared Ownership Resales, Shared Ownership New Build, Rent To Buy	Runnymede, Spelthorne, Surrey Heath, Windsor and Maidenhead	Addlestone, Bishops Gate, Chertsey, Egham Wick, Englefield Green, Longcross, Lyne, Ottershaw, Thorpe, Virginia Water, Laleham, Chobham, Lightwater, Old Windsor
HTB-83361-L5L7R2	Shared Ownership Resales, Shared Ownership New Build	Surrey Heath	Lightwater
HTB-83799-V5P2V0	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Surrey Heath	Frimley

HTB-83837-C2X4X4	Shared Ownership New Build	Surrey Heath	West End
HTB-83881-V9D5K5	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath	Camberley
HTB-83952-D2Q6Q0	Shared Ownership Resales, Shared Ownership New Build	Bracknell Forest, Surrey Heath, Woking, Wokingham	Bracknell, Camberley, Woking, Wokingham
HTB-84079-W8D3S7	Shared Ownership Resales, Shared Ownership New Build	Guildford, Rushmoor, Surrey Heath	Ash Vale, Aldershot, Cove, Mytchett
HTB-84286-Q8M1G7	Shared Ownership Resales, Shared Ownership New Build, Rent To Buy	Guildford, Rushmoor, Surrey Heath	Camberley, Guildford, Aldershot, Cove, Frimley, Frimley Green, Mytchett
HTB-85129-V1R0B7	Shared Ownership Resales, Shared Ownership New Build, Rent To Buy	Bracknell Forest, Surrey Heath	Bracknell, Camberley
HTB-85331-N3B4M3	Shared Ownership New Build	Surrey Heath	Camberley
HTB-85845-B8J5Q9	Shared Ownership Resales, Shared Ownership New Build	Elmbridge, Slough, Surrey Heath, Woking, Buckinghamshire	Aylesbury, Camberley, Molesey, Weybridge, Wexham, Woking, High Wycombe, Marlow
HTB-86053-H0X1T6	Shared Ownership Resales, Shared Ownership New Build, Rent To Buy	Surrey Heath	Lightwater
HTB-86372-R4K5X1	Shared Ownership Resales, Shared Ownership New Build	Elmbridge, Guildford, Runnymede, Surrey Heath, Woking	Camberley, Walton on Thames, Weybridge, Guildford, St Johns, Addlestone, Chertsey, New Haw, Ottershaw, Row Town, Byfleet, Sheerwater, Westfield West Byfleet, Woking
HTB-86384-B5B7N8	Shared Ownership New Build	Surrey Heath	Lightwater
HTB-86602-G9C4R9	Shared Ownership Resales, Shared Ownership New Build, Rent To Buy	Hart, Rushmoor, Surrey Heath	Camberley, Blackwater, Frogmore, Aldershot, Cove, Deepcut, Frimley, Frimley Green, Mytchett, Old Dean, Windlesham
HTB-86732-J7K4N9	Shared Ownership New Build; Rent To Buy	Surrey Heath	West End
HTB-86783-Z4F1P1	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	South Oxfordshire, Surrey Heath	Camberley, Didcot
HTB-86786-X8R5T6	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath	West End
HTB-88079-B6M7K7	Shared Ownership Resales; Shared Ownership New Build	Elmbridge, Surrey Heath, Waverley, Woking	Camberley, Walton on Thames, Godalming, Knaphill
HTB-88218-W7R1N6	Shared Ownership Resales, Shared Ownership New Build	Bracknell Forest, Rushmoor, Surrey Heath	Camberley, Crowthorne, Cove, Frimley
HTB-88698-C8T1Y5	Shared Ownership Resales, Shared Ownership New Build	Surrey Heath	Camberley
HTB-88810-X9Z3R9	Shared Ownership Resales; Shared Ownership New Build	Guildford, Hart, Surrey Heath	Camberley, Fleet, Ash Vale, Frimley
HTB-89423-W2F5K0	Shared Ownership New Build	Surrey Heath	Camberley
HTB-89513-D5H9Z0	Shared Ownership New Build, Rent To Buy	Surrey Heath	West End
HTB-89553-Q8Y5V9	Shared Ownership Resales; Shared Ownership New Build	Bracknell Forest, Elmbridge, Epsom and Ewell, Guildford, Mole Valley, Reigate and Banstead, Runnymede, Rushmoor, Spelthorne, Surrey Heath, Tandridge, Woking	Ascot, Bracknell, Camberley, Esher, Molesey, Oxshott, Thames Ditton, Walton on Thames, Weybridge, Epsom, Epsom Downs, Ewell, Stoneleigh, Ash Vale, Guildford, Send, Tongham, Dorking, Leatherhead, Banstead, Burgh Heath, Reigate, Tadworth, Walton-on-the-Hill, Addlestone, Aldershot, Sunbury on Thames, Chobham, Lightwater, Oxted, Byfleet, Goldsworth, Westfield West Byfleet, Woking
HTB-89633-X1C2X3	Shared Ownership New Build, Rent To Buy	Bracknell Forest, Surrey Heath, Windsor and Maidenhead	Ascot, Warfield, Frimley, Old Windsor
HTB-90156-G0S9Y6	Shared Ownership Resales, Shared Ownership New Build, Rent To Buy	Surrey Heath	Chobham
HTB-90388-Z8Y6X3	Shared Ownership Resales; Shared Ownership New Build	Cornwall, Eastbourne, Surrey Heath, Weymouth and Portland, Worthing	Liskeard Town, Eastbourne, Lightwater, Weymouth, Worthing
HTB-90515-N5Q2D7	Shared Ownership New Build	Surrey Heath	Frimley
HTB-90981-V3B3N8	Shared Ownership Resales, Shared Ownership New Build	Hart, Rushmoor, Surrey Heath	Fleet, West End, Cove
HTB-91316-Y5X2Y6	Shared Ownership Resales, Shared Ownership New Build	Hart, Surrey Heath	Camberley, Yateley, Fleet, Hook, Deepcut
HTB-91665-C2Y6F5	Shared Ownership New Build	Surrey Heath	Camberley
HTB-91672-T8K3R0	Shared Ownership New Build	Surrey Heath	Camberley
HTB-92054-Z7W2L0	Shared Ownership New Build	Surrey Heath	Camberley

HTB-92403-Q2T5W1	Shared Ownership Resales,Shared Ownership New Build	Surrey Heath	Camberley
HTB-92677-B9V1V9	Shared Ownership Resales,Shared Ownership New Build,Rent To Buy	Surrey Heath	Frimley Green
HTB-92750-H1S9N0	Shared Ownership Resales,Shared Ownership New Build,Rent To Buy	Surrey Heath	Camberley
HTB-93348-V5W8M3	Shared Ownership New Build	Surrey Heath	Camberley
HTB-93544-P4Y8W3	Shared Ownership New Build,Extra Care Older Persons Shared Ownership	Guildford, Runnymede, Surrey Heath, Waverley, Woking	Camberley, West End, Pirbright, Send, Chertsey, Longcross, New Haw, Bisley, Chobham, Lightwater, Mytchett, Badshot Lea, Brookwood, Mayford, Sutton Green
HTB-93739-C6B4B4	Shared Ownership Resales,Shared Ownership New Build	Surrey Heath	Camberley, West End, Frimley
HTB-94052-M4T8K0	Shared Ownership New Build	Surrey Heath	Deepcut
HTB-94472-Q1X6D9	Shared Ownership New Build,Rent To Buy,Home Ownership People with Long Term Disabilities	Surrey Heath	Camberley
HTB-94631-G7G3Z1	Shared Ownership Resales,Shared Ownership New Build	Bracknell Forest, Elmbridge, Runnymede, Spelthorne, Surrey Heath, Windsor and Maidenhead, Wokingham, Buckinghamshire	Ascot, Bracknell, Camberley, Winkfield, Walton on Thames, Weybridge, Chertsey, Egham Wick, Englefield Green, Stains, Iver Heath, Frimley, Frimley Green, Old Windsor, Wokingham
HTB-95067-D4F1L1	Shared Ownership Resales,Shared Ownership New Build,Rent To Buy	Bracknell Forest, Runnymede, Surrey Heath, Windsor and Maidenhead, Woking	Ascot, Camberley, Chertsey, Longcross, Chobham, Frimley, Windlesham, Maidenhead Riverside, Woking
HTB-95954-R1R1Q4	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Surrey Heath	Chobham
HTB-95983-C4R0G3	Shared Ownership New Build	Surrey Heath	Lightwater
HTB-96175-Z5J5W7	Shared Ownership Resales; Shared Ownership New Build	Guildford, Rushmoor, Surrey Heath	Camberley, Ash Vale, Guildford, Aldershot, Mytchett
HTB-96197-D2C1N1	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Bracknell Forest, Epsom and Ewell, Reigate and Banstead, Runnymede, Spelthorne, Surrey Heath, Wokingham	Ashford, Bracknell, Camberley, Crowthorne, Horley , Epsom, Addlestone, Shepperton, Wokingham
HTB-97138-Y8J7P3	Shared Ownership New Build	Surrey Heath	Camberley
HTB-97372-X9B6N5	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath	Camberley
HTB-100783-Y1K1R2	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Hart, Surrey Heath	Camberley, Fleet
HTB-100857-L6G2Z4	Shared Ownership New Build	Basildon, Bracknell Forest, Brentwood, Elmbridge, Guildford, Milton Keynes, Mole Valley, North Hertfordshire, Reading, Runnymede, Spelthorne, St Albans, Stevenage, Surrey Heath, Three Rivers, Welwyn Hatfield, Windsor and Maidenhead, Woking, Wokingham	Ashford, Twyford, Billericay, Ascot, Binfield, Bracknell, Camberley, Crowthorne, Warfield, Brentwood, Shenfield, Woburn Sands, Redbourn, Weybridge, Farley Green, Shenley Brook End, Shenley Church End, Leatherhead, Hitchin, Knebworth, Caversham, Caversham Heights, Whitley, Addlestone, Chertsey, Stains, Virginia Water, Stanwell Moor, London Colney, St Albans, Stevenage, Chobham, Deepcut, Frimley, Lightwater, Watford Rural, Hatfield, Welwyn Garden City, Cox Green, Horton and Wraybury, Maidenhead Riverside, Old Windsor, Woking, Earley, Sonning, Wargrave, Winnersh, Wokingham
HTB-102037-Z4M7F0	Shared Ownership New Build	Surrey Heath	Deepcut
HTB-102119-N2N9Z6	Shared Ownership New Build; Rent To Buy	Surrey Heath	West End
HTB-102695-V7Q8M4	Shared Ownership Resales; Shared Ownership New Build	Bracknell Forest, Surrey Heath	Ascot, Bracknell, Camberley
HTB-102829-C8D4D9	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Basingstoke and Deane, Bracknell Forest, Guildford, Havant, Oxford, Portsmouth, Reading, Southampton, Surrey Heath, Swindon, Waverley, Windsor and Maidenhead, Wokingham	Basingstoke, Bracknell, Camberley, Farnham, Worplesdon, Havant, Oxford, Portsmouth, Southcote, Southampton, Highworth, Cookham, Arborfield
HTB-102877-POV0H7	Shared Ownership New Build	Surrey Heath	Chobham

HTB-103731-X4R2W7	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath	Camberley
HTB-104270-S9Q0W4	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Surrey Heath	Camberley
HTB-105251-D9G1N9	Shared Ownership New Build	Surrey Heath	Deepcut
HTB-106338-R5L9P9	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Surrey Heath	Frimley Green
HTB-106893-L5N9V6	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Canterbury, Colchester, Crawley, Elmbridge, Epsom and Ewell, Guildford, Hastings, Havant, Mid Sussex, Mole Valley, Portsmouth, Reigate and Banstead, Runnymede, South Cambridgeshire, South Oxfordshire, Spelthorne, Surrey Heath, Tandridge, Test Valley, Waverley, Winchester, Woking, Wokingham, Buckinghamshire	Aston Abbots, Hardwick, Camberley, Adisham, Emsworth, Abberton, Three Bridges, Weybridge, Langley Vale, Pirbright, Hastings, Burgess Hill, Dorking, Portsmouth, Banstead, Beckley, Stains, Thorpe, Bletchingley, Andover, Tilford, Winchester, Woking, Earley
HTB-107706-X8X7P4	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath	West End
HTB-108955-Y3N7B5	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath	Camberley
HTB-109268-X9J9N6	Shared Ownership New Build	Surrey Heath	Camberley
HTB-109827-M0K2N2	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Bracknell Forest, Guildford, Hart, Surrey Heath	Camberley, Crowthorne, Yateley, Fleet, Ash Green, Eversley, Frimley Green, Lightwater
HTB-110660-N2K9X8	Shared Ownership New Build; Rent To Buy	Guildford, Surrey Heath, Woking	Camberley, Worplesdon, St Johns, Chobham, Lightwater, Brookwood, Goldsworth, Knaphill, Woking
HTB-111165-X2Q9C2	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Hart, North Devon, Rushmoor, Surrey Heath	Camberley, Yateley, Hawley, Fleet, Hook, Ilfracombe, Aldershot, Cove, Chobham, Deepcut, Frimley, Frimley Green, Old Dean
HTB-111484-V2B5Z0	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath	Camberley
HTB-112570-Q0M0B2	Shared Ownership Resales; Shared Ownership New Build	East Hampshire, Elmbridge, Spelthorne, Surrey Heath	Camberley, Headley Down, Walton on Thames, Sunbury on Thames
HTB-114829-H3H2N1	Shared Ownership Resales; Shared Ownership New Build	Bracknell Forest, Guildford, Hart, Rushmoor, Surrey Heath	Bracknell, Camberley, Crowthorne, Guilford, Blackwater, Aldershot, Cove, Frimley, Lightwater
HTB-116475-V4S6S6	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Runnymede, Surrey Heath	Addlestone, Chertsey, Chobham
HTB-116953-S1M9V7	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Bracknell Forest, Crawley, Epsom and Ewell, Mid Sussex, Milton Keynes, Slough, St Albans, Surrey Heath, Watford, Windsor and Maidenhead, Buckinghamshire	Austock, Akeley, Ashendon, Aston Abbots, Oldfield, Ascot, Binfield, Bracknell, Crowthorne, Warfield, Winkfield, Three Bridges, Epsom, Haywards Heath, Central Milton Keynes, Windsor Meadows, Eton Wick, Maidenhead, St Albans, Frimley, North Watford, Belmont, Bray, Castle West, Clewer Park, Cookham, Cox Green, Datchet, Eton and Castle, Furze Platt, Horton and Wraysbury, Hurley and Walthams, Maidenhead Riverside, Old Windsor, Pinkneys Green, High Wycombe, Princes Risborough, West Wycombe
HTB-117144-J7S1W9	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy; Extra Care Older Persons Shared Ownership	Surrey Heath	Chobham
HTB-117332-D3Y4H2	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath	Deepcut

			Basingstoke, Brighton Hill, Chineham, Hatch Warren, Kempsnot, Old Basing, Overton, Popley, Sherborne St John, Tadley, Camberley, Yateley, Liphook, Fleet, Alton, Four Marks, Blackwater, Church Crookham, Crookham Village, Hartley Wintney, Hook, North Warnborough, Odiham, Phoenix Green, Aldershot, Cove, Frimley, Frimley Green, Old Dean, Andover, Micheldever
HTB-117821-X9K3L8	Shared Ownership Resales; Shared Ownership New Build	Basingstoke and Deane, East Hampshire, Hart, Rushmoor, Surrey Heath, Test Valley, Winchester	
HTB-117992-G3M2X0	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath, Woking	Camberley, Goldsworth
HTB-118116-P8L1G8	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Surrey Heath	Camberley, Deepcut, Frimley, Frimley Green, Lightwater, Mytchett
HTB-118608-Y1Q7N6	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy; Extra Care Older Persons Shared Ownership; Home Ownership People with Long Term Disabilities	Rushmoor, Surrey Heath	Cove, Deepcut, Old Dean
HTB-119078-Y5L3Q2	Shared Ownership New Build	Guildford, Surrey Heath	Guilford, Chobham
HTB-119248-R4Y9D6	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath	Camberley
HTB-120317-Q6F9Q5	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Surrey Heath	Camberley
HTB-120973-T1D8K8	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Surrey Heath	Camberley
HTB-121129-C5V6H3	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath	Chobham
HTB-121170-T6X4P7	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Elmbridge, Guildford, Runnymede, Surrey Heath, Waverley, Woking	Camberley, Walton on Thames, Weybridge, Guildford, Virginia Water, Cranleigh, Woking
HTB-121181-R9S7Z4	Shared Ownership New Build	Guildford, Surrey Heath, Waverley, Woking	Farnham, Ash Vale, Frimley, Lightwater, Woking
HTB-121391-Z1F4P4	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Surrey Heath	Camberley, Chobham, Deepcut, Frimley, Frimley Green, Lightwater, Mytchett, Old Dean, Windlesham
HTB-121806-C4W7D7	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath	Camberley, Deepcut, Frimley, Frimley Green, Lightwater
HTB-121869-V3S0H4	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath	Camberley
HTB-122172-Q2Z9T1	Shared Ownership New Build	Surrey Heath	Camberley
HTB-122239-M6S1C9	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Rushmoor, Surrey Heath	Camberley, Aldershot
HTB-122928-B4P7J7	Shared Ownership New Build; Rent To Buy; Home Ownership People with Long Term Disabilities	Guildford, Hart, Surrey Heath, Waverley	Camberley, Farnham, Tongham, Church Crookham, Crondall
HTB-123646-T4M7C1	Shared Ownership New Build; Rent To Buy	Surrey Heath	Deepcut
HTB-124002-L4J5L0	Shared Ownership Resales; Shared Ownership New Build	Rushmoor, Surrey Heath, Waverley	Farnham, Aldershot, Deepcut
HTB-124348-Z7D3Q4	Shared Ownership Resales; Shared Ownership New Build	Basingstoke and Deane, Surrey Heath, Winchester	Basingstoke, Camberley, Winchester
HTB-124406-M9J8X2	Shared Ownership Resales; Shared Ownership New Build	Bracknell Forest, Elmbridge, Runnymede, Surrey Heath	Bracknell, Weybridge, Addlestone, Chertsey, Ottershaw, Lightwater
HTB-124517-P9R6D3	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Guildford, Hart, Rushmoor, Surrey Heath, Waverley	Camberley, Farnham, Fleet, Guildford, Tongham, Aldershot, Cove
HTB-124680-Y2N7R0	Shared Ownership New Build	Chelmsford, Guildford, St Albans, Surrey Heath, Buckinghamshire	Windsor, Chelmsford, Guildford, St Albans, Chobham
HTB-124684-S4K9J8	Shared Ownership New Build; Rent To Buy	Hart, Rushmoor, Surrey Heath	Camberley, Fleet, Aldershot, Frimley
HTB-125646-W8P9Z6	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Guildford, Surrey Heath, Woking	Camberley, Ash Vale, Woking
HTB-127840-D1K4C8	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Rushmoor, Surrey Heath	Camberley, Aldershot, Cove, Frimley
HTB-127841-W3Q6T1	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Bracknell Forest, Rushmoor, Surrey Heath	Bracknell, Camberley, Cove

HTB-128014-V9Z7T5	Shared Ownership New Build	Surrey Heath	Camberley, Deepcut, Frimley
HTB-128190-Y5S0J1	Shared Ownership New Build	Surrey Heath	Deepcut
HTB-128228-M1D0Z7	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath, Windsor and Maidenhead, Wokingham	Camberley, Hurley and Walthams, Woodley
HTB-129684-T0D5Q7	Shared Ownership New Build	Spelthorne, Surrey Heath	Ashford, Camberley
HTB-129753-B9J9H5	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath	Frimley
HTB-131957-N0C8K3	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Guildford, Surrey Heath, Waverley, Woking	Camberley, Puttenham, Farnham, Lightwater, Godalming, Brookwood
HTB-132199-R3Q4Q9	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Epsom and Ewell, Guildford, Surrey Heath, Waverley, Woking	Epsom Downs, Ash Vale, East Clandon, Chobham, Beacon Hill, Byfleet
			Burpham, Westcott, Camberley, Balls Cross, Haslemere, Petworth, Plaistow, Wisborough Green, Puttenham, Farnham, Headley, Albury, West End, Claygate, Downside, Esher, Hersham, Hinchley Wood, Long Ditton, Oxshott, Stoke Dâ€™Abernon, Thames Ditton, Walton on Thames, Weybridge, Epsom, Epsom Downs, Ewell, Wotton, Ash Green, Ash Vale, East Clandon, East Horsley, Effingham, Gomshall, Guilford, Jacobs Well, Ockham, Peaslake, Pirbright, Send, Shackelford, Shalford, St Marthas Hill, Tongham, West Clandon, West Horsley, Wisley, Worplesdon, Billingshurst, Horsham, Pulborough, Rudgwick, Abinger Hammer, Ashtead, Beare Green, Dorking, Fetcham, Great Bookham, Holmwood, Leatherhead, Mickleham, Westhumble, Ewhurst, Lower Haliford, Shepperton, Upper Halliford, Chobham, Lightwater, Dunsford, Chiddingfold, Cranleigh, Godalming, Milford, Rushmoor, Shamley Green, Byfleet, Goldsworth, Horsell, Knaphill, Maybury, Sheerwater, Westfield West Byfleet, Woking
HTB-132885-Z9L3F7	Shared Ownership Resales; Shared Ownership New Build	Chichester, Elmbridge, Epsom and Ewell, Guildford, Horsham, Mole Valley, Spelthorne, Surrey Heath, Waverley, Woking	Knaphill, Maybury, Sheerwater, Westfield West Byfleet, Woking
HTB-133440-M3X4J5	Shared Ownership Resales; Shared Ownership New Build	Horsham, Surrey Heath	Horsham, Chobham
HTB-134430-S2Y6S2	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy; Home Ownership People with Long Term Disabilities	Crawley, Horsham, Reigate and Banstead, Surrey Heath, Woking	Horley, Bewbush, Tilgate, Horsham, Banstead, Earlswood, Mertsam, Reigate, Salfords, Walton-on-the-Hill, Woodmansterne, Chobham, Woking
HTB-134599-Y1M3P0	Shared Ownership Resales; Shared Ownership New Build	Bracknell Forest, Spelthorne, Surrey Heath, Windsor and Maidenhead	Bracknell, Stains, Lightwater, Windlesham, Maidenhead Riverside
HTB-134610-R1L8D2	Shared Ownership New Build	Surrey Heath	Deepcut
HTB-134638-Q0J0D1	Shared Ownership New Build; Rent To Buy	Surrey Heath	West End
HTB-135716-F8T3R9	Shared Ownership Resales; Shared Ownership New Build	Bracknell Forest, Slough, Surrey Heath, Windsor and Maidenhead, Wokingham, Buckinghamshire	Twyford, Binfield, Bracknell, Camberley, Crowthorne, Winkfield, Wexham, Maidenhead Riverside, Shinfield, High Wycombe
HTB-135719-B5Y9R4	Shared Ownership New Build	Surrey Heath	Chobham

			Bramley, Bramley Green, Sherfield on Loddon, Tadley, Binfield, Camberley, Crowthorne, Warfield, West Green, Puttenham, Hawley, Farnham, Fleet, Alton, Bordon, Bramshott, Chawton, Ash Vale, Normandy, Pirbright, Send, Shalford, Tongham, Worplesdon, Crondall, Crookham Village, Eversley, Greywell, Hartley Wintney, Hook, Mattingley, North Warnborough, Phoenix Green, Rotherwick, Cove, Deepcut, Frimley, Lightwater, Mytchett, Windlesham, Badshot Lea, Elstead, Runfold, Tilford, Brookwood, Finchampstead, Ryeish Green, Shinfield, Spencers Wood, Three Mile Cross, Wargrave, Wokingham
HTB-136393-T2X5C6	Shared Ownership New Build; Rent To Buy	Basingstoke and Deane, Bracknell Forest, East Hampshire, Guildford, Hart, Rushmoor, Surrey Heath, Waverley, Woking, Wokingham	Deepcut
HTB-136442-Z4L2D7	Shared Ownership New Build	Surrey Heath	Camberley, Virginia Water, Bisley, Deepcut, Frimley, Frimley Green, Lightwater, Mytchett, Rushmoor
HTB-136728-Z2V5P6	Shared Ownership Resales; Shared Ownership New Build	Runnymede, Surrey Heath, Waverley	
HTB-136784-S9Y8K3	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Bracknell Forest, Surrey Heath	Bracknell, Camberley
HTB-137264-T8C0K2	Shared Ownership Resales; Shared Ownership New Build	Elmbridge, Guildford, Mole Valley, Reigate and Banstead, Spelthorne, Surrey Heath, Tandridge, Woking	Molesey, Thames Ditton, Walton on Thames, Guilford, Dorking, Great Bookham, Leatherhead, Redhill, Stains, Sunbury on Thames, Chobham, Whyteleafe, Woking
HTB-137411-G9Q6Q8	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath	Bisley
HTB-137847-S1K3S0	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath	Camberley
HTB-137882-K4T7L2	Shared Ownership New Build	Surrey Heath	Deepcut
HTB-138296-P3F2Z2	Shared Ownership New Build	Bracknell Forest, Surrey Heath	Camberley, Crowthorne
HTB-138330-V8Y4V8	Shared Ownership New Build	East Hampshire, Surrey Heath	Bordon, Frimley Green
HTB-138489-M5F6M7	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Hart, Surrey Heath	Camberley, Fleet, Blackwater, Eversley, Frimley Green, Mytchett
HTB-138711-T2J4N6	Shared Ownership New Build	Surrey Heath	Camberley
HTB-138779-X3D6J6	Shared Ownership New Build	Surrey Heath	Camberley, Deepcut, Frimley, Frimley Green, Lightwater, Mytchett, Windlesham
HTB-138842-W2M1M2	Shared Ownership New Build	Surrey Heath	West End
HTB-139068-T2W7B3	Shared Ownership New Build	Surrey Heath	Camberley
HTB-139190-Z6H0F2	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Bracknell Forest, Hart, Surrey Heath, Wokingham	Camberley, Crowthorne, Frogmore, Wokingham
HTB-139380-R3X2W3	Shared Ownership Resales; Shared Ownership New Build	Rushmoor, Surrey Heath	Camberley, Cove, Frimley, Frimley Green
HTB-139452-P4G6T4	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Guildford, Surrey Heath	Camberley, Ash Green, Ash Vale, Shere, Deepcut, Frimley Green, Lightwater, Mytchett, Windlesham
HTB-139962-Z3N5B7	Shared Ownership New Build; Rent To Buy	Surrey Heath	Camberley, Deepcut
HTB-140054-S3Y0Z8	Shared Ownership Resales; Shared Ownership New Build	Bracknell Forest, Surrey Heath, Wokingham	Bracknell, Camberley, Windlesham, Wokingham
HTB-140090-P7Z9V6	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Basingstoke and Deane, Surrey Heath	Basingstoke, Camberley
HTB-140162-P3K4S1	Shared Ownership Resales; Shared Ownership New Build	Bracknell Forest, Surrey Heath, West Berkshire, Wokingham	Camberley, Crowthorne, Thatcham, Finchampstead, Winnersh
HTB-140331-Z6K6W9	Shared Ownership Resales; Shared Ownership New Build	Hart, Surrey Heath, Wiltshire	Hook, Frimley Green, Purton
HTB-141409-Z4L6T6	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Surrey Heath	Frimley Green

HTB-141689-X4D5R6	Shared Ownership Resales; Shared Ownership New Build	Bracknell Forest, Hart, Reading, Surrey Heath, West Berkshire, Wokingham	Bracknell, Camberley, Yateley, Hook, Caversham, Farnborough, Deepcut, Frimley, Mytchett, Theale, Tilehurst, Earley, Shinfield, Winnersh, Wokingham, Woodley
HTB-141809-V5C8R0	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Bracknell Forest, Reading, Surrey Heath	Bracknell, Camberley, Caversham
HTB-142421-D0F4C6	Shared Ownership Resales; Shared Ownership New Build	Hart, Surrey Heath, Wokingham	Fleet, Frimley, Wokingham
HTB-142861-H9J0N3	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Elmbridge, Epsom and Ewell, Guildford, Runnymede, Surrey Heath	Walton on Thames, Epsom, Guildford, Longcross, Chobham
HTB-142989-F9L2X1	Shared Ownership Resales; Shared Ownership New Build	Epsom and Ewell, Mole Valley, Reigate and Banstead, Surrey Heath	Camberley, Horley, Ewell, Leatherhead, Banstead, Mertsam, Reigate, Walton-on-the-Hill
HTB-143105-L2Q0M6	Shared Ownership Resales; Shared Ownership New Build	Guildford, Reading, Surrey Heath, Windsor and Maidenhead, Wokingham	Camberley, Guildford, Caversham, Whitley, Maidenhead Riverside, Barkham, Shinfield, Winnersh, Wokingham, Woodley
HTB-143433-H7F8P7	Shared Ownership Resales; Shared Ownership New Build	Hart, Surrey Heath	Yateley, Fleet, Blackwater, Hartley Wintney, Bisley, Chobham, Frimley
HTB-143440-L4W6H1	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath	Lightwater
HTB-143546-N5P9H1	Shared Ownership Resales; Shared Ownership New Build	Basingstoke and Deane, Bournemouth Christchurch & Poole, Surrey Heath	Basingstoke, Boscombe East, Boscombe West, Winton East, Winton West, West End
HTB-143714-T1W7Y0	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath	Deepcut
HTB-143715-R5Y7L6	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Ashford, Basildon, Bracknell Forest, Brentwood, Elmbridge, Epsom and Ewell, Hart, Reading, Reigate and Banstead, Runnymede, Rushmoor, Sevenoaks, Spelthorne, Surrey Heath, Tonbridge and Malling, Tunbridge Wells, Woking	Ashford, Chilmington Green, Hothfield, Kingsnorth, Little Chart, Mersham, Willesborough, Billericay, Ascot, Bracknell, Camberley, Brentwood, Fleet, Walton on Thames, Weybridge, Epsom, Ewell, Chatham, Caversham, Whitley, Redhill, Reigate, Addlestone, New Haw, Stains, Aldershot, Sevenoaks, Sunbury on Thames, Frimley, Royal Tunbridge Wells, Brookwood, Byfleet, Horsell, Pyrford, Westfield West Byfleet, Woking
HTB-143813-L5C0F2	Shared Ownership New Build	Surrey Heath	Camberley
HTB-143876-F0V3G5	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath	Camberley
HTB-144063-W3W5C6	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Surrey Heath	Camberley, Mytchett
HTB-144266-K9G1S8	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Surrey Heath	Camberley, West End, Deepcut, Frimley, Frimley Green, Lightwater, Mytchett
HTB-144374-J0F5D8	Shared Ownership New Build; Rent To Buy	Rushmoor, Surrey Heath	Cove, Frimley Green
HTB-144702-Q1P7H3	Shared Ownership New Build	Surrey Heath	Deepcut
HTB-145098-Y8M5H7	Shared Ownership Resales; Shared Ownership New Build	Bracknell Forest, Guildford, Horsham, Surrey Heath, Waverley, Woking	Bracknell, Camberley, Guildford, Horsham, Godalming, Woking
HTB-145456-D4J4Y1	Shared Ownership New Build	Surrey Heath	Deepcut
HTB-145551-P8C3F3	Shared Ownership Resales; Shared Ownership New Build	Dartford, Epping Forest, Guildford, Surrey Heath	Camberley, Dartford, Swanscombe, Epping, Waltham Abbey, Guildford
HTB-145611-K0P7N9	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Surrey Heath	Deepcut
HTB-145781-J9B2Q0	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Bracknell Forest, Guildford, Surrey Heath, Woking	Bracknell, Camberley, Ash Vale, Woking
HTB-145878-Q1T0L8	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath	Camberley
HTB-145986-X6V4G6	Shared Ownership New Build	Surrey Heath	Deepcut
HTB-146041-X4M8S4	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath	Camberley

HTB-146140-W5W2V1	Shared Ownership Resales; Shared Ownership New Build	Guildford, Surrey Heath	Pirbright, Deepcut, Frimley, Frimley Green
HTB-146611-Y2V3K5	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath	Deepcut
HTB-147058-Q4H5Q4	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Guildford, Surrey Heath, Buckinghamshire	Amersham, Ash Vale, Gerrards Cross, Chobham
HTB-147199-B1M1N8	Shared Ownership Resales; Shared Ownership New Build	Bracknell Forest, Hart, Surrey Heath	Camberley, Crowthorne, Hook
HTB-147201-ROJ8K6	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Surrey Heath	Camberley
HTB-147251-V0T9Y1	Shared Ownership Resales; Shared Ownership New Build; Home Ownership People with Long Term Disabilities	Surrey Heath, Waverley, Windsor and Maidenhead	Camberley, Farnham, Cookham, Eton and Castle
HTB-147563-D4K9Z7	Shared Ownership New Build	Surrey Heath	Deepcut
HTB-147579-C5G9V4	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Slough, Surrey Heath	Camberley, Chalvey, Salt Hill
HTB-148257-G3J3X3	Shared Ownership Resales; Shared Ownership New Build	East Hampshire, Hart, Rushmoor, Surrey Heath	Fleet, Bordon, Hook, Cove, Lightwater
HTB-148289-X1X6F0	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Hart, Rushmoor, Surrey Heath	Church Crookham, Crookham Village, Aldershot, Windlesham
HTB-148428-J8C0W9	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Basingstoke and Deane, Bracknell Forest, Guildford, Rushmoor, Surrey Heath, Wokingham	Tadley, Binfield, Camberley, Tongham, Aldershot, Frimley, Shinfield
HTB-148678-W6S9S7	Shared Ownership Resales; Shared Ownership New Build	Bracknell Forest, Guildford, Hart, Rushmoor, Surrey Heath, Wokingham	Bracknell, Camberley, Crowthorne, Yateley, Fleet, Ash Green, Hook, Cove, Frimley, Wokingham
HTB-149070-L5K9N1	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Surrey Heath	Camberley
HTB-149081-POW0Z1	Shared Ownership Resales; Shared Ownership New Build	Rushmoor, Surrey Heath	Camberley, Aldershot, Cove, Frimley
HTB-149234-C0G8R7	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Guildford, Rushmoor, Surrey Heath, Woking	Guilford, Aldershot, Frimley Green, Goldsworth
HTB-149635-K3T8J5	Shared Ownership Resales; Shared Ownership New Build	Chichester, East Hampshire, Surrey Heath, West Berkshire	Chichester, Alton, Deepcut, Pangbourne
HTB-149709-S8D8G0	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath	Camberley
HTB-149725-G6J1W9	Shared Ownership New Build	Ashford, Bracknell Forest, Eastbourne, Guildford, Hastings, Horsham, Mid Sussex, Rother, Rushmoor, Surrey Heath, Swale, Tunbridge Wells, Worthing	Tenterden, Camberley, Crowthorne, Eastbourne, Ash Vale, Hastings, Southwater, Burgess Hill, Haywards Heath, Bodium, Rye, Aldershot, Frimley, Faversham, Royal Tunbridge Wells, Goring-by-Sea
HTB-149853-L4T1B9	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Elmbridge, Mole Valley, Surrey Heath, Waverley, Woking	Camberley, Walton on Thames, Dorking, Leatherhead, Cranleigh, Woking
HTB-150545-N0S5J7	Shared Ownership New Build	Surrey Heath	West End
HTB-150761-K2C1M5	Shared Ownership Resales; Shared Ownership New Build	Guildford, Hart, Surrey Heath, Waverley	Camberley, Hawley, Farnham, Fleet, Ash Green, Ash Vale, Frimley, Frimley Green, Mytchett, Badshot Lea
HTB-150785-F5B7K3	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Surrey Heath	Lightwater
HTB-150854-K8X6T2	Shared Ownership Resales; Shared Ownership New Build	East Hampshire, Guildford, Hart, Rushmoor, Surrey Heath, Waverley, Winchester	Camberley, Farnham, Fleet, Alton, Four Marks, Medstead, Guildford, Church Crookham, Hook, Odiham, Aldershot, Alresford, Winchester
HTB-151113-F2Z5Z8	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath	Frimley
HTB-151894-R9M5P9	Shared Ownership Resales; Shared Ownership New Build	Rushmoor, Surrey Heath	Camberley, Aldershot, Deepcut, Frimley, Mytchett
HTB-152019-D7H0Q4	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath	Frimley
HTB-152029-B3V9Y1	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Surrey Heath	Chobham
HTB-152407-L6P4P4	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath, Waverley	Camberley, Farnham, Frimley, Godalming

HTB-152431-Q3D8Y4	Shared Ownership Resales; Shared Ownership New Build	Epsom and Ewell, Reigate and Banstead, Sevenoaks, Surrey Heath, Tonbridge and Malling	Camberley, Epsom, Ewell, Banstead, Edenbridge, East Malling, Kings Hill
HTB-153084-Q1M1K3	Shared Ownership Resales; Shared Ownership New Build	Basingstoke and Deane, Bracknell Forest, Hart, Surrey Heath, Windsor and Maidenhead, Wokingham	Basingstoke, Bracknell, Camberley, Fleet, Hook, Lightwater, Maidenhead Riverside, Wokingham
HTB-153094-B2S8J6	Shared Ownership Resales; Shared Ownership New Build	Bracknell Forest, Hart, Rushmoor, Surrey Heath, Wokingham	Bracknell, Camberley, Crowthorne, Yateley, Blackwater, Frogmore, Hartley Wintney, Hook, Aldershot, Cove, Frimley, Frimley Green, Woodley
HTB-153283-Y2L4M7	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath, Waverley	Camberley, Farnham, Frimley
HTB-153353-G8T8L4	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy; Extra Care Older Persons Shared Ownership	Surrey Heath	Camberley
HTB-153451-K7L2Q6	Shared Ownership Resales; Shared Ownership New Build	Hart, Rushmoor, Surrey Heath	Yateley, Hawley, Fleet, Blackwater, Church Crookham, Crondall, Hartley Wintney, Hook, North Warnborough, Aldershot, Cove, Chobham, Deepcut, Frimley, Frimley Green, Mytchett, Windlesham
HTB-153482-J3L6B0	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath	Camberley
HTB-153591-H9H5C3	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Surrey Heath	Camberley
HTB-153671-B5G2B1	Shared Ownership New Build	Surrey Heath	Mytchett
HTB-153775-M1M1T2	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath	Camberley
HTB-154075-P5G0V7	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Bracknell Forest, Elmbridge, Epsom and Ewell, Guildford, Mole Valley, Runnymede, Rushmoor, Spelthorne, Surrey Heath, Waverley, Woking	Bracknell, Camberley, Farnham, Esher, Epsom, Guildford, Leatherhead, Addlestone, Stains, Aldershot, Byfleet, Woking
HTB-154355-N0J5G4	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Surrey Heath	Deepcut
HTB-154362-B0R1X8	Shared Ownership New Build; Rent To Buy	Sevenoaks, Surrey Heath	Riverhead, Lightwater
HTB-154611-S8Y4J8	Shared Ownership Resales; Shared Ownership New Build	Rushmoor, Surrey Heath, Waverley	Farnham, Aldershot, Cove, Deepcut, Mytchett, Badshot Lea
HTB-154684-Z1N0S1	Shared Ownership Resales; Shared Ownership New Build	Runnymede, Spelthorne, Surrey Heath, Woking	Ashford, Camberley, Addlestone, Chertsey, Stains, Shepperton, Woking
HTB-154727-D8D3F1	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Guildford, Rushmoor, Surrey Heath, West Berkshire, Woking	Camberley, Ash Vale, Tongham, Aldershot, Farnborough, Byfleet, Knaphill, Woking
HTB-154734-M9C5T1	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Surrey Heath	West End, Deepcut
HTB-155337-S6X9S2	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Guildford, Runnymede, Surrey Heath	Tongham, Virginia Water, Windlesham
HTB-155346-Q1B4B7	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Surrey Heath	Frimley
HTB-155882-F5X7P3	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath	Deepcut
HTB-155930-C0Z0Z7	Shared Ownership Resales; Shared Ownership New Build	Guildford, Surrey Heath, Waverley	East Horsley, Chobham, Cranleigh
HTB-156092-D4K5Y8	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Bracknell Forest, Runnymede, Surrey Heath, Woking	Ascot, Bracknell, Addlestone, Chertsey, Egham Wick, Englefield Green, Longcross, New Haw, Ottershaw, Frimley, Byfleet
HTB-156115-K3Z8X3	Shared Ownership New Build; Rent To Buy	Surrey Heath	Frimley
HTB-156601-Q0W2S4	Shared Ownership Resales; Shared Ownership New Build	Brentwood, Chelmsford, Colchester, Surrey Heath, Thurrock	Brentwood, Chelmsford, Hardy's Green, Chobham, Stanford-le-Hope

HTB-156800-B2C3G4	Shared Ownership Resales; Shared Ownership New Build	Bracknell Forest, Surrey Heath, Windsor and Maidenhead, Wokingham	Twyford, Ascot, Binfield, Bracknell, Crowthorne, Warfield, Winkfield, Windlesham, Furze Platt, Pinkneys Green, Barkham, Earley, Shinfield, Wargrave, Winnersh, Wokingham, Woodley
HTB-157070-W3W3R9	Shared Ownership Resales; Shared Ownership New Build	Hart, Surrey Heath, Waverley	Camberley, Yateley, Fleet, Deepcut, Frimley, Frimley Green, Badshot Lea
HTB-157620-V9R2Q3	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Bracknell Forest, Surrey Heath, Windsor and Maidenhead	Ascot, Bracknell, Warfield, Winkfield, Windlesham, Datchet
HTB-157731-K5G7R4	Shared Ownership Resales; Shared Ownership New Build	Elmbridge, Runnymede, Surrey Heath, Woking	Camberley, Esher, Chertsey, Ottershaw, Thorpe, Virginia Water, Chobham, Woking
HTB-157850-D8N4S9	Shared Ownership Resales; Shared Ownership New Build	Runnymede, Rushmoor, Surrey Heath	Camberley, Addlestone, Cove
HTB-159048-L0H9Y3	Shared Ownership Resales; Shared Ownership New Build	Rushmoor, Surrey Heath	Cove, Frimley, Mytchett
HTB-159108-Q3P6S4	Shared Ownership Resales; Shared Ownership New Build	Basingstoke and Deane, Reading, Surrey Heath	Basingstoke, Camberley, Caversham
HTB-159186-M1R5X2	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Surrey Heath, Wokingham	Camberley, Arborfield
HTB-159471-W4D7Z5	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Basingstoke and Deane, Hart, Rushmoor, Surrey Heath, Woking	Basingstoke, Camberley, Fleet, Blackwater, Aldershot, Frimley, Brookwood
HTB-159556-C5G1F1	Shared Ownership Resales; Shared Ownership New Build	Rushmoor, Surrey Heath	Aldershot, Frimley
HTB-160041-T3B4Q7	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Bedford, Braintree, Brighton and Hove, Bristol, Cambridge, Canterbury, Cheltenham, Elmbridge, Epsom and Ewell, Guildford, Mid Sussex, Mole Valley, Reading, Reigate and Banstead, South Oxfordshire, Surrey Heath, Swindon, Buckinghamshire	Adstock, Brickhill, Castle, Bocking Blackwater, Aldington, Arnos Vale, Adisham, Battledown, Albury, Claygate, Epsom, Albourne, Abinger Hammer, Caversham, Burgh Heath, Adwell, Bisley, Badbury
HTB-160204-D9H8S2	Shared Ownership Resales; Shared Ownership New Build	Basingstoke and Deane, Hart, Surrey Heath	Basingstoke, Camberley, Yateley, Hawley, Odiham
HTB-160259-G2C0S0	Shared Ownership Resales; Shared Ownership New Build	Bracknell Forest, Surrey Heath	Camberley, Crowthorne
HTB-160310-Q0C1K9	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath	Camberley
HTB-160453-J7D5L4	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Bracknell Forest, East Hampshire, Guildford, Surrey Heath, Woking	Burpham, Ascot, Binfield, Bracknell, Warfield, Winkfield, Bordon, Ash Green, Ash Vale, Fairlands, Jacobs Well, Merrow, Normandy, Pirbright, Tongham, Woodstreet Village, Worplesdon, Lightwater, Sutton Green
HTB-160489-K5S8L3	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Bracknell Forest, Guildford, Hart, Mole Valley, Rushmoor, Surrey Heath, Waverley, Woking	Bracknell, Camberley, Farnham, Fleet, Guildford, Fetcham, Aldershot, Godalming, Woking
HTB-160653-K3B8R0	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Guildford, Surrey Heath, Waverley	Camberley, Ash Green, Ash Vale, Pirbright, Frimley, Frimley Green, Badshot Lea
HTB-160843-C7B8J6	Shared Ownership Resales; Shared Ownership New Build	Rushmoor, Surrey Heath, Wokingham	Cove, Old Dean, Wokingham
HTB-160866-L7T2P1	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Basingstoke and Deane, Bracknell Forest, Guildford, Rushmoor, Surrey Heath, Test Valley, Windsor and Maidenhead, Wokingham	Chineham, Binfield, Guildford, Aldershot, Deepcut, Andover, Bray, Wokingham
HTB-160869-L9M1C7	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Hart, Surrey Heath	Camberley, Blackwater
HTB-161184-Y0B1M6	Shared Ownership Resales; Shared Ownership New Build	Basingstoke and Deane, Surrey Heath	Basingstoke, Mytchett
HTB-161204-N7K2C7	Shared Ownership Resales; Shared Ownership New Build	Hart, Surrey Heath	Crookham Village, Lightwater
HTB-161297-K8S4H8	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Colchester, Maidstone, Mid Sussex, Surrey Heath	Abberton, Marley, West End, Burgess Hill
HTB-161579-K8S3V8	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Surrey Heath	Frimley

HTB-162016-X7X3F9	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Elmbridge, Guildford, Mole Valley, Reading, Reigate and Banstead, Runnymede, Slough, Spelthorne, Surrey Heath, Waverley, Windsor and Maidenhead, Woking	Farnham, Walton on Thames, Ash Vale, Guildford, Dorking, Leatherhead, Caversham, Whitley, Redhill, Reigate, Addlestone, Chertsey, Egham Wick, Virginia Water, Manor Park, Shepperton, Frimley, Godalming, Bray, Maidenhead Riverside, Byfleet, Hook Heath, Sutton Green, Westfield West Byfleet, Woking
HTB-162202-K4F4D1	Shared Ownership Resales; Shared Ownership New Build	Guildford, New Forest, Surrey Heath	East Clandon, Lyndhurst, Chobham
HTB-162421-R3N5P1	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Crawley, Eastbourne, Guildford, Horsham, Mid Sussex, Surrey Heath, Waverley	Camberley, Langley Green, Eastbourne, Guildford, Horsham, Haywards Heath, Cranleigh
HTB-162453-D1B1V0	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Surrey Heath	Windlesham
HTB-162552-D7M0C6	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Elmbridge, Epsom and Ewell, Guildford, Mole Valley, Reigate and Banstead, Surrey Heath, Waverley	Camberley, Haslemere, Farnham, Oxshott, Ewell, Ash Vale, Dorking, Redhill, Deepcut, Frimley, Chiddingfold, Cranleigh, Witley
HTB-162650-M6W7D6	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Ashford, Basildon, Elmbridge, Epsom and Ewell, Guildford, Maidstone, Reigate and Banstead, Sevenoaks, Spelthorne, Surrey Heath, Tunbridge Wells, Waverley, Woking	Ashford, Hastingleigh, Southend-on-dea, Camberley, Walton on Thames, Epsom, Guildford, Boxley, Salfords, Sevenoaks, Colliers Green, Godalming, Pamlers Cross, Woking
HTB-162899-G2G8F6	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Surrey Heath	Camberley
HTB-163334-V4C1S5	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy; Home Ownership People with Long Term Disabilities	Surrey Heath	Camberley
HTB-163341-G5Y8B4	Shared Ownership Resales; Shared Ownership New Build	Basingstoke and Deane, East Devon, Surrey Heath, Woking	Chineham, Camberley, Ottery St Mary, Sidmouth, Knaphill, Woking
HTB-163697-L1X5Q2	Shared Ownership New Build	Surrey Heath	Deepcut
HTB-165728-T6B4K8	Shared Ownership New Build; Home Ownership People with Long Term Disabilities	Elmbridge, Mole Valley, Reigate and Banstead, Surrey Heath	Camberley, Molesey, Dorking, Redhill
HTB-166133-F1S3D0	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Basingstoke and Deane, East Hampshire, Surrey Heath	Basingstoke, Alton, Lightwater
HTB-166434-M1T9D5	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Elmbridge, Guildford, Surrey Heath	Camberley, Stoke Dâ€™Abernon, Effingham
HTB-166767-K9M1Y0	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath	Camberley
HTB-166774-K3J3R6	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath, Waverley	Lightwater, Cranleigh
HTB-166894-S4G2S6	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Basingstoke and Deane, Hart, Rushmoor, Surrey Heath, Waverley	Basingstoke, Camberley, Yateley, Farnham, Fleet, Church Crookham, Crookham Village, Hook, Cove
HTB-166999-L4L4R8	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath	Camberley
HTB-167030-R3Z5D3	Shared Ownership New Build	Rushmoor, Surrey Heath	Cove, Frimley Green
HTB-167195-B9N5T9	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath	West End
HTB-167259-C0V9R3	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath	Camberley
HTB-167533-W5W9G4	Shared Ownership New Build; Rent To Buy	Surrey Heath, Waverley	Camberley, Farnham
HTB-167939-X6K1D6	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath	Camberley
HTB-169518-R2W1Y2	Shared Ownership Resales; Shared Ownership New Build	Hart, Surrey Heath	Camberley, Yateley, Hawley, Fleet, Blackwater, Church Crookham, Crookham Village, Eversley, Frogmore, Hartley Wintney, Hook, Odiham, Deepcut, Frimley, Frimley Green, Mytchett
HTB-169526-T4G8C9	Shared Ownership Resales; Shared Ownership New Build	Elmbridge, Guildford, Mole Valley, Runnymede, Surrey Heath, Waverley, Woking	Camberley, Farnham, Weybridge, Guildford, Leatherhead, Longcross, Woking

HTB-169547-R5X1P0	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath, Wokingham	Camberley, Wokingham
HTB-169711-W1H0T9	Shared Ownership New Build	Surrey Heath	Deepcut
HTB-170340-Z1P9C5	Shared Ownership Resales; Shared Ownership New Build; Home Ownership People with Long Term Disabilities	Surrey Heath	Camberley
HTB-170543-M2Z0V4	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Surrey Heath	Camberley
HTB-170725-V7Q7J4	Shared Ownership Resales; Shared Ownership New Build	Rushmoor, Surrey Heath	Camberley, Cove
HTB-170786-H8W3Z3	Shared Ownership Resales; Shared Ownership New Build	Hart, Rushmoor, Surrey Heath	Yateley, Hawley, Fleet, Cove, Frimley, Mytchett
HTB-170814-R8N3X1	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Surrey Heath	Deepcut
HTB-170864-P2P3C0	Shared Ownership New Build	Surrey Heath	Frimley Green
HTB-170909-S4G2J6	Shared Ownership New Build	Surrey Heath	Deepcut
HTB-171094-Y7G4W2	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Bracknell Forest, Runnymede, Spelthorne, Surrey Heath, Woking	Ashford, Ascot, Binfield, Bracknell, Camberley, Crowthorne, Addlestone, Bishops Gate, Chertsey, Ottershaw, Stains, Stroude, Laleham, Sunbury on Thames, Deepcut, Frimley, Frimley Green, Lightwater, Windlesham, Horsell, Woking
HTB-171192-D9L8S4	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Bracknell Forest, Surrey Heath	Camberley, Crowthorne
HTB-171692-X0X7B5	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath	Camberley
HTB-171879-B3T7G8	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Bracknell Forest, Surrey Heath, Waverley, Windsor and Maidenhead, Woking	Bracknell, Camberley, Farnham, Cox Green, Woking
HTB-171970-J2T2P4	Shared Ownership New Build	Surrey Heath	Camberley, Chobham, Deepcut
HTB-172016-F5Z7D7	Shared Ownership New Build; Extra Care Older Persons Shared Ownership	Surrey Heath	Chobham
HTB-172820-B7L8R8	Shared Ownership New Build	Rushmoor, Surrey Heath	Cove, Chobham
HTB-172926-Z2K1D2	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Bracknell Forest, Hart, Surrey Heath, Woking	Bracknell, Camberley, Fleet, West End, Blackwater, Bisley, Deepcut, Frimley, Frimley Green, Lightwater, Old Dean, Windlesham, Knaphill
HTB-172943-N3H4Y4	Shared Ownership New Build	Surrey Heath	Deepcut
HTB-172978-D9G3Z4	Shared Ownership Resales; Shared Ownership New Build	Guildford, Surrey Heath, Woking	Guildford, Chobham, Woking
HTB-173170-C8N2W4	Shared Ownership Resales; Shared Ownership New Build	Rushmoor, Surrey Heath	Camberley, Aldershot
HTB-173231-F6G3L7	Shared Ownership New Build	Surrey Heath	Deepcut
HTB-173291-K6P3P5	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath	Deepcut
HTB-173557-X7Q9P2	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath	Deepcut
HTB-173713-K4M1S3	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath	Camberley
HTB-173720-L4F4B9	Shared Ownership New Build	Elmbridge, Epsom and Ewell, Surrey Heath	Esher, Ewell, Chobham
HTB-173936-C9B1P8	Shared Ownership Resales; Shared Ownership New Build	Bath and North East Somerset, Canterbury, Eastbourne, Epsom and Ewell, Horsham, Reigate and Banstead, Sedgemoor, Surrey Heath, Tunbridge Wells, Worthing	Bath, Littlebourne, Eastbourne, Epsom, Ewell, Horsham, Redhill, Bridgewater-Newtown, Bridgewater Without, Lightwater, Royal Tunbridge Wells, Broadwater
HTB-174005-Q4T0H6	Shared Ownership New Build	Hart, Surrey Heath	Fleet, Deepcut
HTB-174574-L3V9D5	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Epsom and Ewell, Guildford, Reigate and Banstead, Surrey Heath, Woking	Epsom, Guildford, Banstead, Chobham, Woking
HTB-174952-H6J0Z9	Shared Ownership Resales; Shared Ownership New Build	Basingstoke and Deane, Hart, Rushmoor, Surrey Heath	Basingstoke, Camberley, Fleet, Church Crookham, Aldershot, Cove
HTB-175049-P6K4D4	Shared Ownership Resales; Shared Ownership New Build	East Hampshire, Guildford, Hart, Rushmoor, Surrey Heath, Waverley, Woking	Camberley, Alton, Holybourne, Ash Vale, Guildford, Blackwater, Aldershot, Cove, Frimley, Rushmoor, Woking
HTB-175105-T2J6P8	Shared Ownership New Build	Medway, Surrey Heath, Thurrock	Camberley, Grays, Gillingham

HTB-175197-D6Q7T5	Shared Ownership Resales; Shared Ownership New Build; Home Ownership People with Long Term Disabilities	Surrey Heath	West End
HTB-175277-Y4J4M2	Shared Ownership New Build	Surrey Heath	Chobham
HTB-175296-F1M6Z0	Shared Ownership Resales; Shared Ownership New Build	Bracknell Forest, Oxford, Southampton, Surrey Heath, Swindon, Wiltshire, Buckinghamshire	Bracknell, Camberley, Amersham, Wanborough, Oxford, Southampton, Salisbury
HTB-175501-GOK8M1	Shared Ownership New Build; Rent To Buy	Hart, Surrey Heath	Camberley, Fleet, Deepcut
HTB-175618-Q4G2L2	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	East Hampshire, Surrey Heath, Wokingham	Bordon , Frimley, Wokingham
HTB-175867-K2Q5S1	Shared Ownership Resales; Shared Ownership New Build	Rushmoor, Surrey Heath	Cove, Deepcut
HTB-175975-Y3P2J3	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Bracknell Forest, East Hampshire, Elmbridge, Runnymede, Surrey Heath	Bracknell, Bordon , Thames Ditton, Addlestone, Deepcut
HTB-176102-H5P2W4	Shared Ownership New Build	Surrey Heath	Deepcut
HTB-176216-D0P5W7	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Surrey Heath	Camberley
HTB-176246-W7S2Q9	Shared Ownership New Build	Surrey Heath	Camberley, Deepcut, Frimley, Frimley Green, Old Dean
HTB-176292-G2M8T5	Shared Ownership New Build	Surrey Heath	Windlesham
HTB-176357-R6Y1R2	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath	Camberley, Deepcut
HTB-176744-R3X2V9	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath	Camberley
HTB-176794-Y2W2B3	Shared Ownership Resales; Shared Ownership New Build	Basingstoke and Deane, Bracknell Forest, Exeter, North Devon, Rushmoor, Surrey Heath, Windsor and Maidenhead, Wokingham	Basingstoke, Binfield, Bracknell, Camberley, St Thomas Exeter, Barnstaple , Aldershot, Old Windsor, Wargrave, Winnersh, Wokingham
HTB-177533-Z0V2V7	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	East Hampshire, Oxford, Surrey Heath, Windsor and Maidenhead	Camberley, Alton, Oxford, Maidenhead Riverside
HTB-177566-M1D4G2	Shared Ownership Resales; Shared Ownership New Build	Guildford, Rushmoor, Surrey Heath	Camberley, Guilford, Aldershot, Cove
HTB-177872-J4G4G9	Shared Ownership New Build	Hart, Surrey Heath	Camberley, Yateley
HTB-178072-K5M1F6	Shared Ownership Resales; Shared Ownership New Build	Guildford, Hart, Rushmoor, Surrey Heath	Ash Vale, Blackwater, Aldershot, Cove, Mytchett
HTB-178111-F2F7C6	Shared Ownership Resales; Shared Ownership New Build	Bracknell Forest, Reading, Runnymede, Spelthorne, Surrey Heath, Windsor and Maidenhead, Wokingham	Bracknell, Camberley, Warfield, Caversham, Egham Wick, Stains, Virginia Water, Lightwater, Clewer Park, Arborfield
HTB-178133-Z5P4C0	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath	Windlesham
HTB-178360-N9N0V8	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Elmbridge, Guildford, Surrey Heath	Camberley, Weybridge, Guilford
HTB-178435-P2W5H3	Shared Ownership Resales; Shared Ownership New Build	Bracknell Forest, Surrey Heath	Bracknell, Camberley, Deepcut
HTB-179056-P4R2C4	Shared Ownership New Build	Bracknell Forest, Surrey Heath	Camberley, Crowthorne
HTB-179117-G0F2T8	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath	Camberley
HTB-179207-N9C6M7	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath	Camberley
HTB-179271-M2S3X1	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Sevenoaks, Surrey Heath	Edenbridge, Sevenoaks, Chobham
HTB-179319-Y3M5Z4	Shared Ownership New Build	Surrey Heath	Lightwater
HTB-179364-C7F6C5	Shared Ownership Resales; Shared Ownership New Build	Rushmoor, Spelthorne, Surrey Heath, Wokingham	Camberley, Stains, Aldershot, Winnersh, Wokingham
HTB-179583-Q4Z8T9	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Brentwood, Chelmsford, Colchester, Dartford, Rushmoor, Surrey Heath, Waverley	Camberley, Shenfield, Chelmsford, Marks Tey, West Bergholt, Darenth, Greenhithe, Longfield, Southfleet, Farnham, Aldershot, Cove, Frimley, Frimley Green
HTB-179625-Q7W1Z5	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Guildford, Runnymede, Surrey Heath, Woking, Wokingham	Send, Chertsey, Deepcut, Knaphill, Wokingham
HTB-180211-K6Z8J5	Shared Ownership New Build	Surrey Heath	Camberley
HTB-180287-C9N2H1	Shared Ownership Resales; Shared Ownership New Build	Surrey Heath	Camberley, Chobham, Deepcut, Frimley, Frimley Green, Lightwater, Mytchett, Old Dean

HTB-180918-F0W1Q1	Shared Ownership New Build	Surrey Heath	West End
HTB-181037-S9N0H1	Shared Ownership Resales; Shared Ownership New Build; Rent To Buy	Rushmoor, Surrey Heath	Aldershot, Deepcut
HTB-181966-T6Z7R8	Shared Ownership Resales; Shared Ownership New Build	Bracknell Forest, Runnymede, Spelthorne, Surrey Heath, Windsor and Maidenhead	Ascot, Camberley, Egham Wick, Stains, Thorpe, Old Windsor
HTB-182097-H2Y4Q1	Shared Ownership New Build; Rent To Buy	Surrey Heath	Camberley
HTB-182360-F2X6D7	Shared Ownership Resales; Shared Ownership New Build	Bracknell Forest, Elmbridge, Guildford, Spelthorne, Surrey Heath	Bracknell, Hinchley Wood, Guildford, Shepperton, Lightwater

APPENDIX 3. LAND AT GROVE END, GREEN BELT ANALYSIS

GROVE END, BAGSHOT

GREEN BELT ANALYSIS

Prepared on behalf of

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SOM1297gba



Placing development well

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Green Belt Analysis	
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Revision	-

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1.0 Introduction

- 1.1.1 The aim of this report is to provide an assessment of the of the Site's performance against the purposes of the Green Belt and assessment of the site contribution to the Green Belt openness from both a spatial and visual perspective – having regard to the Samuel Smith Old Brewery case, as set out in paragraph 138 of the NPPF. It also considers the effect on the Green Belt as a result of the proposed development at the Site.
- 1.1.2 This analysis considers the development of up to 135 dwellings, including a minimum 50% affordable homes, with associated landscaping, parking, open space, play areas, etc.: the construction of a new vehicular access on to Grove End serving the development of up to 135 dwellings: reconfiguration of the existing vehicular access serving the Windlesham Golf Club: and all other associated development works (Access only detailed matter with all other matters reserved).
- 1.1.3 This document should be read alongside the submitted Landscape and Visual Impact Assessment (LVIA) SOM1297lvia.
- 1.1.4 This document also includes analysis relating to the site's location within and relationship with Green Belt.
- 1.1.5 Initially, a desk based study will identify any primary constraints. This will include the analysis of published documents related to the Green Belt.

2.0 The Green Belt

The Green Belt Designation

2.1.1 Green Belt is a policy with the purpose of controlling the sprawl of urban areas by keeping land permanently open; consequently the most important attribute of green belts is their openness.

2.1.2 The purposes of green belt were set out in 1955 by the Ministry of Housing and Local Government as being:

- To check the further growth of a large built up area;
- To prevent neighbouring towns from merging into one another; and
- To preserve the special character of a town.

2.1.3 The site falls within the Metropolitan Green Belt, which covers roughly 516,000 hectares.

2.2 Protection of Green Belt Land

2.2.1 The fundamental aims of Green Belt policy are set out in the National Planning Policy Framework (NPPF).

2.2.2 At Paragraph 137 of the NPPF it states:

“The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.”

2.2.3 The five purposes that Green Belt serves are defined at paragraph 138 of the NPPF as:

- To check the unrestricted sprawl of large built-up areas;
- To prevent neighbouring towns merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns; and
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

2.3 Green Belt in Surrey Heath

2.3.1 Over 44% of land within Surrey is designated as Green Belt. This represents nearly half the borough area and is a policy that forms a constraint on development.

3.0 The Site

- 3.1.1 The site is an agricultural field that is defined by a combination of riparian vegetation, tree lines and hedgerows of varying quality that sit within a space created by the local network of transport corridors.
- 3.1.2 This 'pocket' that is formed by transport corridors, the railway line, A322 and Grove End which are associated with the surrounding settlement of Bagshot form a strong boundary to the site. The typical character of this area is of urban edge, formed by the local transport corridors, built form and the golf course.
- 3.1.3 The site is not covered by any policies or designations of relevance to landscape.
- 3.1.4 The site is not considered to be a 'valued' landscape in respect of NPPF paragraph 174a. Further analysis of this can be found within the submitted LVIA.
- 3.1.5 The vegetation, built form and landform of the local area prevents potential mid or long range views of the site, so the area has a well enclosed character.

Green Belt Policy

- 3.1.6 The adopted policies of relevance to Green Belt within the Surrey Heath Local Plan 2000 are as follows.

POLICY RE1: THE GREEN BELT

Within the Borough an area of Green Belt will be maintained as defined on the Proposals Map.

- 3.1.7 This policy states that Green Belt land will not be removed from the policy. This is common to all Green Belt policy.

POLICY RE2: DEVELOPMENT WITHIN THE GREEN BELT

Within the Green Belt, there will be a general presumption against inappropriate development, except in very special circumstances.

1. The construction of buildings is inappropriate unless it is for the following purposes:

(a) Agriculture or forestry;

(b) Essential facilities for outdoor sport and outdoor recreation, cemeteries and for other uses of land which preserve the openness of the green belt and which do not conflict with the purposes of including land in it;

(c) The replacement or extension of existing dwellings in accordance with Policy RE5;

(d) The re-use of rural buildings in accordance with Policy RE6;

(e) Limited infilling and small scale affordable housing in the settlement area of Chobham in accordance with Policies E5 and H9.

(f) The infilling or redevelopment of the Major Developed Sites identified in this Plan in accordance with Policies RE17 and M21.

2. The material change of use of land and the carrying out of engineering and other operations are inappropriate development unless they maintain the openness of the Green Belt and do not conflict with the purposes of including land in it.

Development proposals which are otherwise appropriate in the Green Belt, should not be detrimental to the visual amenity and nature conservation interests of the Green Belt.

3.1.8 Due to the well enclosed nature of the surrounding landscape, the visual amenity of the area will not be materially change and any perceptible change will be localised and limited.

4.0 Surrey Heath Green Belt Assessment

4.1.1 The site sits within the local government district of Surrey Heath Borough Council (SHBC). The SHBC Development Plan offers a number of policies that relate to the Green Belt and development within it.

4.1.2 The Surrey Heath Borough Green Belt Review was published in 2022 by SHBC in order to undertake a comprehensive study of the strategic role of the Metropolitan Green Belt in Surrey Heath Borough. The site's situation within this document is discussed later in this chapter.

4.2 Previous Assessment of the Site

4.2.1 The site has been previously assessed within the Surrey Heath Local Plan Green Belt Review published January 2022 (SHGBR). This document offers an update to the previously published Green Belt and Countryside Study (2017).

4.2.2 The study is strategic in nature and the Green Belt has been divided into areas known as 'Parcels'.

4.2.3 The assessment is split into two parts, 1 and 2. Part 1 offers an assessment of the functions of Parcels against Green Belt Purposes and Part 2 makes a qualitative assessment using planning judgement to consider the effects of releasing the Parcels to the long term protection of the wider Green Belt.

Part 1 Methodology

4.2.4 Within the Part 1 Assessment, the methodology indicates potential levels of function for four of the five purposes of Green Belt within the identified Parcels as:

- Functions Strongly;
- Functions Moderately;
- Functions Weakly; or
- No appreciable function.

4.2.5 The four of the five purposes of Green Belt that the review assesses the land within the Segments are:

- Checking Sprawl
- Preventing Merging
- Safeguarding from Encroachment
- Historic Setting

4.2.6 An overall rating provides narrative about the decision making process (within Annex 2: Assessment Findings) and final overall contribution of the Parcel is given.

Part 2 Methodology

4.2.7 Within the Part 2 assessment, the methodology indicates potential level of risk of releasing the Parcel to the wider Green Belt as:

- Higher Risk to wider Green Belt;
- Moderate Risk to wider Green Belt;
- Lower Risk to wider Green Belt; or
- Negligible Risk – Risk reflects existing relationship with wider Green Belt.

4.2.8 The site falls within Parcel BG1: Land at Grove End. The site falls within the northern range of Parcels. The Parcels western edge meets the edge of the Green Belt in this area, which follows the A322.

4.2.9 The Part 1 assessed results of Parcel BG1 in which the site is situated are as follows:

- Checking Sprawl – No appreciable function

The parcel is not adjacent or close to any defined large, built-up areas and does not provide a zone of constraint to the sprawl of such an area.

- Preventing Merging – Strong function

The parcel lies within a narrow gap between Bagshot and Snovs Ride and owing to its largely undeveloped nature, the parcel contributes to the visual gap between the settlements, which is undermined in other locations by existing development.

- Safeguarding from Encroachment – Moderate contribution

The Land parcel is largely open, principally comprising pastoral fields and pockets of woodland. Development is limited to dispersed residential dwellings as expected in the countryside. Notwithstanding this, the highway infrastructure encircling the site does have a degree of urbanising influence upon the parcel which, on balance, undermines its otherwise strong performance against P3.

- Historic Setting - No appreciable function

The parcel lies adjacent to the historic settlement of Bagshot, but is separated from the historic core of the settlement by a significant degree of modern development. As such it is not considered that this parcel contributes to the special character of the historic settlement.

4.2.10 The Overall Rating is given as Moderate High Function which falls within the top middle of the range of potential outcomes.

4.2.11 Within the Part 2 assessment the Parcel BG1 is given a Moderate Risk level. A discussion of the findings is detailed as follows:

Development within parcel BG1 would particularly risk containment of adjoining well functioning Green Belt land to the south east and in this location, the existing Green Belt boundary formed by the A322 is very robust. Release of parcel BG1 alone would have a slightly disconnected relationship with the adjoining settlement area. Notwithstanding this, the site is well contained by adjoining highways which would form a robust boundary. Release alongside BG2 would slightly improve the relationship with the adjoining settlement, but would result in the creation of a more diffuse boundary; as such this would not reduce the risk of harm to the wider Green Belt.

4.2.12 The level of risk which would arise from the removal of Parcel BG1 from the Green Belt is considered to be moderate, which falls towards the bottom middle of the scale of effects.

4.2.13 The effects on the green belt assessed within the SHGBR are summarised in the below Table 1 for ease of reference.

Table 1: Summary of SHBGR Assessment

BG1 Land at Grove End	Assessment of GB Purposes				Overall Rating
	P1	P2	P3	P4	
Findings of SHGBR	None	Strong	Moderate	None	Moderate High Function

Section Conclusions

4.2.14 The site does not act as open countryside that separates settlements with the existing urban edge of Bagshot projecting beyond the site presently. The site does not experience extensive views due to local landform, mature vegetation and built form acting as visual barriers that creates enclosure in the local area.

4.2.15 The Parcel was rated higher in the 2017 study under the heading ‘Safeguarding from Encroachment’, having previously been attributed a strong level which was described as being downgraded for the following reason:

Parcel G4 was not considered to function against Purposes 1 and 4, owing to its distance from identified large built-up areas and historic settlements. Parcel G4 was considered to function strongly against Purposes 2 and 3, owing to its open character and the role played by the parcel in preventing development that would result in the merging of Windlesham (Snows Ride) and Bagshot.

4.2.16 The geographic extent from which change on site can be seen is very limited, meaning that the site does not appear open nor does it sit in an a landscape with a generally open character.

4.2.17 Geographically, the existing Hall Grove School sits to the north east of the site, between Bagshot and Windlesham. Also, Longacres Garden Centres eastern boundary extends further to the east than the site’s eastern boundary and falls closer to Windlesham than the site.

4.2.18 The site is situated at the edge of the Green Belt designation area.

4.2.19 The site does not strongly contribute to the fundamental aim of Green Belt, i.e. preventing urban sprawl and is encircled by transport infrastructure that forms strong boundaries.

4.2.20 Although there will of course be a level of spatial change as a result of developing the site, it is physically constrained by transport corridors, the railway line, Grove End and the A322 so exhibits strongly defensible boundaries.

4.2.21 The visual change of the site will be localised and limited due to surrounding enclosure formed by vegetation, built form and the local landform.

5.0 Green Belt Analysis – Site Specific

- 5.1.1 Green Belt is not considered a landscape designation, but as highlighted by the Sam Smith decision (R (Samuel Smith Old Brewery (Tadcaster) and others) v North Yorkshire County Council [2020] UKSC 3) the visual effects of a development on the openness of Green Belt can be considered of relevance to landscape.
- 5.1.2 There is a difference between impacts on visual amenity, which are normally considered within the process of LVIA and the visual aspects of openness which are considered as part of Green Belt Assessment.
- 5.1.3 In LVIA an assessment is made on the effects of development on views available to people and their visual amenity and how this may affect character and scenic quality. In consideration of Green Belt, an assessment is made on the effects of development on the visual openness of the Green Belt including impacts on views, links to the wider Green Belt, inter-visibility between settlements and whether measures could be proposed that would restore the baseline aspects of openness.
- 5.1.4 Openness can have both spatial and visual aspects meaning both visual impacts and volume of development can be of relevance. This is generally considered alongside the duration and remediability of the development and the degree of noticeable activity likely to be generated, such as traffic.

Visual Openness

- 5.1.5 The visual aspect of openness as it relates to the green belt is not measured in the same way as would be the case with a visual assessment. That change is visible is proof of harm in terms of openness.
- 5.1.6 Consequently, if the proposals are visually intrusive they will affect openness regardless of residual visual effects. The site is currently seen in the context of the settlement edge and its urban influence.
- 5.1.7 The extent of the surrounding area from where the change will be perceptible will be geographically limited. This means that although there will be a reduction in the visual openness, it will only be experienced in a very small area.

Spatial Effects

- 5.1.8 Dwellings would stretch across the majority of the site, which would reduce openness compared to the existing open character of the site.
- 5.1.9 The increase in development as proposed will reduce spatial openness on the site and this part of the Green Belt. This spatial change is considered in more detail within the planning submissions.
- 5.1.10 Views into the site will be available from Grove End to the north and east of the site due to its close proximity and the lack of visual barriers along the site's eastern and northern boundaries. Views from the south and west will be heavily filtered from nearby the site's boundary. From the wider landscape views of the site will be mainly obscured by intervening vegetation, built form and the landform.

Activity

- 5.1.11 As a result of the proposed additional dwellings within the green belt the area will not become discernibly busier, as any additional walkers and vehicular movements related to the site's change to residential development will be experienced within a very busy local network of transport corridors where tranquillity is extremely limited.
- 5.1.12 Vehicular movements in particular are identified and quantified within the relevant evidence base as submitted.

Section Conclusions

- 5.1.13 As with any scheme of this nature within Green Belt, a level of spatial harm will occur as a result of development on a currently undeveloped field.
- 5.1.14 The visual aspect of the green belt will be affected, but any change will be localised and limited due to the enclosure formed by surrounding elements of the urban fringe in which it sits.
- 5.1.15 The additional movement created as a result of the proposed residential site use would increase activity in the surrounding area, but these would not be perceptible due to the nature of the current very busy surroundings.

6.0 Review of the Site Against NPPF Paragraph 138 Purposes

- 6.1.1 This Green Belt Analysis forms part of the study of effects of the development proposals to demonstrate whether bringing forward development on this site will support the key purposes of the Green Belt in the context of Bagshot. This analysis considers the current conditions on site and whether its development will detrimentally undermine the function and purposes of the wider designated Green Belt.
- 6.1.2 The site and the effect of the proposed development on it will be assessed against the national Green Belt purposes, however aim 5 does not apply to the site as detailed within the SHGBR so no further analysis of this aim will be given.
- 6.1.3 The National Planning Policy Framework (NPPF) in section 13 Protecting Green Belt land sets out the following five purposes for the inclusion of land within Green Belt.
- a) to check the unrestricted sprawl of large built-up areas;
 - b) to prevent neighbouring towns merging into one another;
 - c) to assist in safeguarding the countryside from encroachment;
 - d) to preserve the setting and special character of historic towns; and
 - e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 6.1.4 The NPPF does not attribute a hierarchy to the five purposes, so it can be assumed that each of the purposes is of a similar level of importance.
- 6.1.5 The NPPF does not offer guidance on how to assess the performance of Green Belt land so a clear methodology will be adopted as detailed below.
- 6.1.6 To provide an analysis of the site's performance against the Green Belt purposes a five point scale will be used as detailed in Table 2 below.

Table 2: Level of Contribution to Green Belt Purposes

Level of Contribution	Typical Indicators
Strong	Land makes a meaningful contribution to this purpose and should remain in the Green Belt
Strong/Moderate	Land performs well against this purpose.
Moderate	Land performs moderately well against this purpose
Moderate/Weak	Land makes some contribution to this purpose
Weak	Land makes limited contribution to this purpose
None	Land makes no contribution to this purpose

- 6.1.7 An important component of the evaluation of the performance of any site in relation to the Green Belt purposes, is consideration of the effectiveness of existing boundaries. The NPPF establishes that boundaries should be clearly defined, using physical features that are readily recognisable and likely to be permanent.
- 6.1.8 The following features are considered most likely to fulfil this requirement:

- Major transport infrastructure, motorways, main trunk roads and railways;
- Landscape features including woodland blocks and bands and watercourses; and
- Topography such as ridgelines.

6.1.9 Where these features are absent secondary boundaries could include historic field hedgerows or minor/private roads.

6.1.10 The five purposes of Green Belt as defined in paragraph 138 of the NPPF are outlined earlier in this document. The site and how it performs against to these purposes are detailed below.

6.2 Purpose 1

To check the unrestricted sprawl of large built-up areas.

6.2.1 The site's current use is as a field which is not actively used for agriculture. The site's western, southern and northern boundaries are well populated with mature trees with undergrowth. The site's eastern boundary is formed by a broken hedgerow with intermittent trees.

6.2.2 The site is bound to the east by the busy Grove End Road. The northern boundary is formed by a residential road with a handful of residential dwellings situated along it that are set within woodland. The site's western boundary is formed by the railway line. The site is well contained by existing transport corridors.

6.2.3 The site will not physically extend further into the countryside than the existing development boundary of Bagshot in any direction, as the existing settlement edge extends further in the landscape to the north, east, south and west than the site's extents.

6.2.4 A combination of the scale of the site, its containment and relationship with the existing built development boundary, will help ensure that development of it will not result in urban sprawl. As a result, the site has no function when assessed against the first purpose.

6.3 Purpose 2

To prevent neighbouring towns from merging into one another.

6.3.1 The site currently has existing residential development and woodland to the north, Grove End a busy road to the east and the railway line to the west that form strong physical enclosure.

6.3.2 The site's development footprint will result in development extending no further towards any other settlement and will not reduce the gap between the current built edge of Bagshot and neighbouring settlements. Development of the site would not result in any merging of settlements and as a result the has a moderate/weak function when assessed against the second purpose.

6.4 Purpose 3

To assist in the safeguarding of countryside from encroachment.

6.4.1 The site is currently surrounded on all sides by existing transport corridors and woodland, which form a 'pocket' that defines the site boundary within the existing settlement urban fringe.

6.4.2 Whilst development of a site that is currently in ostensibly agricultural use, albeit not active, will inevitably cause an element of encroachment, the contained nature of the site and

relationship with the established urban edge will minimise adverse impact in this respect. Development of the site would therefore result in minimal encroachment and the site has a moderate/weak function when assessed against the third purpose.

6.5 Purpose 4

To preserve the setting and special character of historic towns.

6.5.1 The site sits adjacent to and within the current built edge of Bagshot and very few views into the site from the local area are available.

6.5.2 There is no intervisibility between the site and the core of Bagshot, nor with listed buildings or other features of interest within the settlement or surrounding countryside. Development of the site would therefore have no impact upon the historic setting of the settlement and as a result no function when assessed against the fourth purpose.

6.6 Evaluation

6.6.1 What this review of the main purposes of Green Belt for the site shows, is that the site represents a relatively low functioning part of the Green Belt which does not, for the most part, contribute towards the main functions of keeping land permanently open, it is a very enclosed site and is experienced by few receptors. However, the site is currently an enclosed field.

6.6.2 In these regards, the site comprises a relatively low functioning part of the Green Belt when assessed against four of the five purposes as set out in the NPPF. As discussed, purpose 5 has not be further assessed due to lack of contribution the site will make in line with the SHGBR.

6.6.3 The site is surrounded by transport corridors that represent defensible boundaries, with access currently provided into the site via Grove End. The extension of development into what is currently an agricultural field would not result in a protrusion of built form through the existing boundary into open land but would be strongly contained by existing urban edge features i.e transport corridors, and by the dense landscape feature that are situated around the site's boundaries.

6.6.4 Table 3 below details the assessed outcomes of the site specific analysis when compared with the five aims of Green Belt within the NPPF.

Table 3: Level of Contribution to Green Belt Purposes

BG1 Land at Grove End	Assessment of GB Purposes				Overall Rating
	P1	P2	P3	P4	
Findings of this report	None	Moderate/ Weak	Moderate/ Weak	None	Moderate/ Weak Function

Section Conclusions

6.6.5 Overall, it is the conclusion of this report that the site performs as a Moderate/Weak functioning part of the Green Belt and does not strongly contribute to the fundamental aim of Green Belt; preventing urban sprawl by keeping land permanently open. The current site boundaries and surrounding landscape features mean that the site is strongly enclosed and not experienced as open land with the site only visible from a very limited geographic extent.

7.0 Conclusion

- 7.1.1 What this review of the main purposes of Green Belt for the site shows, is that the site represents a relatively low functioning part of the Green Belt which does not, for the most part, contribute towards the main function of keeping land permanently open. It is a generally enclosed site and is experienced by few receptors. However, the site is currently a managed greenfield.
- 7.1.2 In these regards, the site comprises a Moderate/Weak functioning part of the Green Belt when assessed against four of the five purposes as set out in the NPPF.
- 7.1.3 The existing Green Belt boundary of the site is formed by the transport corridors and the vegetation that follows them. The development of the existing field will only be experienced from a very limited geographic extent, as it would be strongly contained by the existing urban elements and the dense landscape features that sit around the site boundaries and in the local landscape.
- 7.1.4 The following table 2 identifies the outcomes of the SHGBR compared with the findings of the analysis of the site’s function as part of the Green Belt contained within this report.

Table 4: Level of Contribution to Green Belt Purposes

BG1 Land at Grove End	Assessment of GB Purposes				
	P1	P2	P3	P4	Overall Rating
Findings of SHGBR	None	Strong	Moderate	None	Moderate High Function
Findings of this report	None	Moderate/Weak	Moderate/Weak	None	Moderate/Weak Function

- 7.1.5 Overall, the site performs as a Moderate/Weak functioning part of the Green Belt and does not strongly contribute to the fundamental aim of Green Belt; preventing urban sprawl by keeping land permanently open. The current site boundaries and local landscape features mean that the site is strongly enclosed and not experienced outside of a limited geographic extent.



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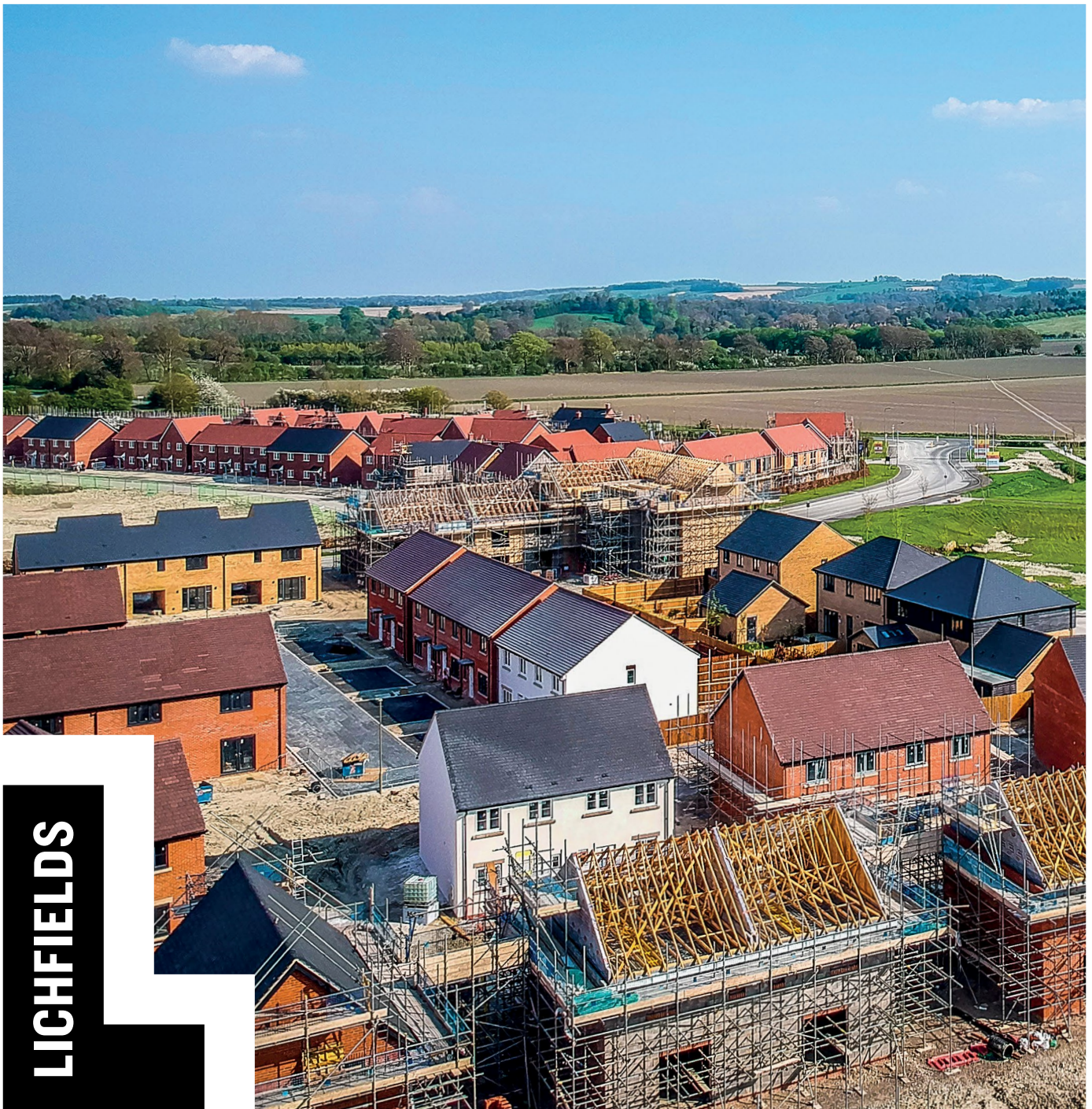
APPENDIX 4. START TO FINISH 3RD EDITION

INSIGHT
MARCH 2024

Start to Finish

How quickly do large-scale housing sites deliver?

THIRD EDITION



LICHFIELDS

Lichfields is the pre-eminent planning and development consultancy in the UK

We've been helping create great places for over 60 years.

Executive summary

This is the third edition of Start to Finish. The purpose of this research remains to help inform the planning system and policy makers in considering the approach to planning for new homes. The empirical evidence we produced in the first two versions has informed numerous local plan examinations, S.78 inquiries and five-year land supply statements.

Things have moved on notably since the second edition in 2020. Plan making and decision taking have slowed, the housing market no longer benefits from Help to Buy or cheap mortgage rates and the perennial concern about perceived land banking has been comprehensively rebutted by the Competition and Markets Authority (CMA). As we approach a general election, and with no end to the housing crisis, the boosting of housing delivery to achieve 300,000 homes per annum through a new generation of Local Plans (prepared under the Levelling Up and Regeneration Act) faces renewed focus. It is therefore timely to refresh the evidence on the delivery of large-scale housing sites, which – with our enlarged sample – now considers real-world implementation across 179 sites of over 500 dwellings.

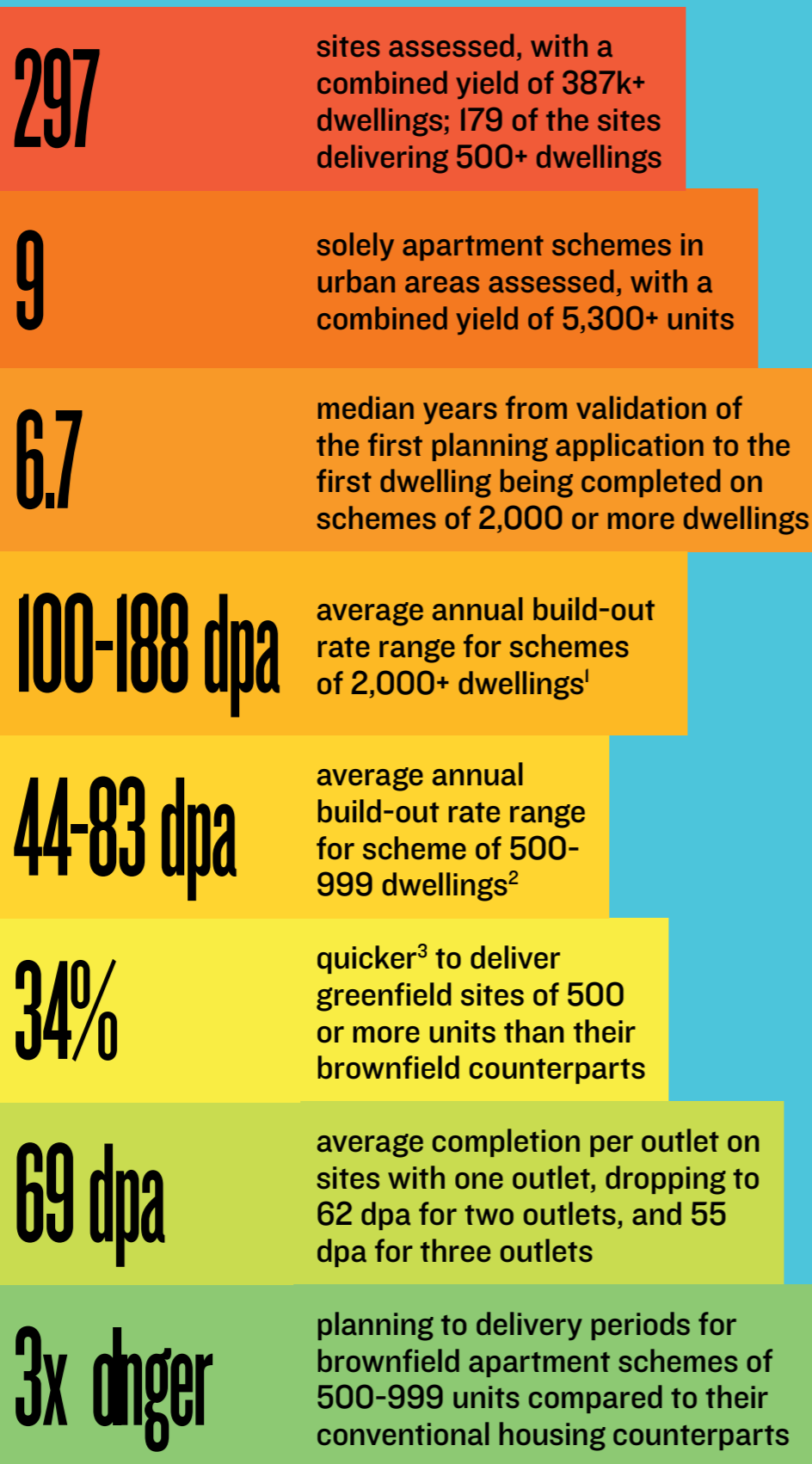
We draw six key conclusions:

1. **Only sites of 99 dwellings or fewer can, on average, be expected to deliver anything in a five-year period from validation of a planning application, with delivery of the first dwelling on average taking 3.8 years.** By comparison, sites of 1,000+ dwellings take on average five years to obtain detailed planning permission, then a further 1.3 - 1.6 years to deliver the first dwelling.

2. **Mean annual build-out rates on large sites have dipped slightly for all site sizes compared to previous editions of this research but are broadly comparable.** The slight dip may capture characteristics of newly-surveyed sites, but also extra monitoring years since 2019 that reflect market changes.
3. **Tough market conditions mean a likely slowing in build-out rates and house building overall.** The impact of the Help to Buy programme ending and increased mortgage rates is not yet showing in completions data, but the effect on transactions has already been significant and the OBR forecast they will fall further in 2024/25.
4. **Demand is a key driver of build-out rates.** The absorption rate of the local housing market dictates the number of homes a builder will sell at a price consistent with the price they paid for the land. Areas with a higher demand for housing (measured by higher affordability ratios, of house prices to earnings) had higher average annual build-out rates than lower demand areas.
5. **Variety (of housing type and tenure) is the spice of life.** Schemes with 30% or more affordable housing had faster average annual build-out rates than schemes with a lower percentage, but schemes with no affordable housing at all delivered at a faster pace than schemes with 10 - 29% affordable units. Having additional outlets on site also has a positive impact on build-out rates.
6. **Large-scale entirely apartment schemes can achieve significant annual build-out rates, but delivery is not always consistent, with 'lumpy' delivery of blocks of apartments and a higher susceptibility to market downturns and other development constraints.** These schemes can also have protracted planning to delivery periods compared to conventional housing schemes of the same size.



Key figures



¹ Range is from the lower quartile to upper quartile figures

² As above

³ This is based on the median metric

O1 Introduction

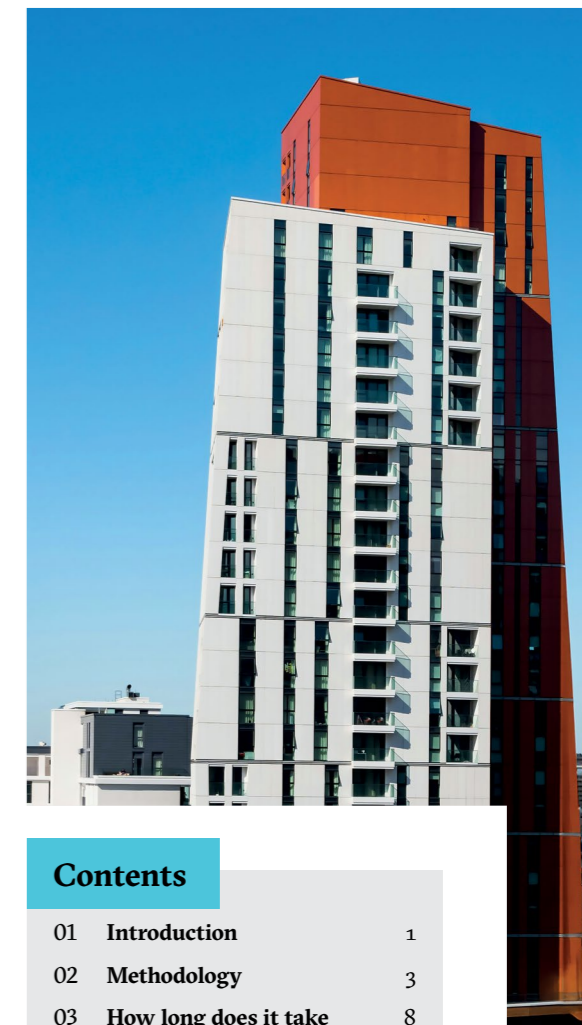
This is the third edition of Lichfields' award winning⁴ research on the build out of large-scale residential development sites.

First published in 2016 and then updated in 2020, the report is established as an authoritative evidence base for considering housing delivery in the context of planning decisions, local plans and public policy debates.

In this update, we have expanded the sample size (with an extra 82 large sites delivering 500 or more dwellings, taking our total to 179 large sites, equivalent to over 365,000 dwellings). Small sites data has also been updated with 118 examples totalling over 22,000 dwellings in this third edition. We have used the latest monitoring data⁵ where available, up to 1st April 2023.

The context for considering the delivery of development sites has evolved since our last edition and this has shaped the focus of our analysis.

In 2020 a recently re-elected Conservative government was gearing up for radical planning reform⁶ including proposals aimed at boosting rates of on-site delivery following Sir Oliver Letwin's independent review of build out⁷. As of 2024, the business models of housebuilders and land promoters - and allegations of perceived 'land banking' - have received fresh examination by the Competition and Markets Authority (CMA) which published its Market Study in February 2024⁸. The CMA found that land banking is a symptom of the planning system rather than a cause of under delivery of housing. We have cross referenced our latest findings with the CMA's work.



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⁴ The first edition was the winner of the 2017 RTP1 Planning Consultancy Research Award

⁵ Some sites have not been updated due to lack of publicly available data. The appendices make clear to which sites this relates

⁶ Leading in due course to the August 2020 Planning White Paper: Planning for the Future

⁷ Published October 2018

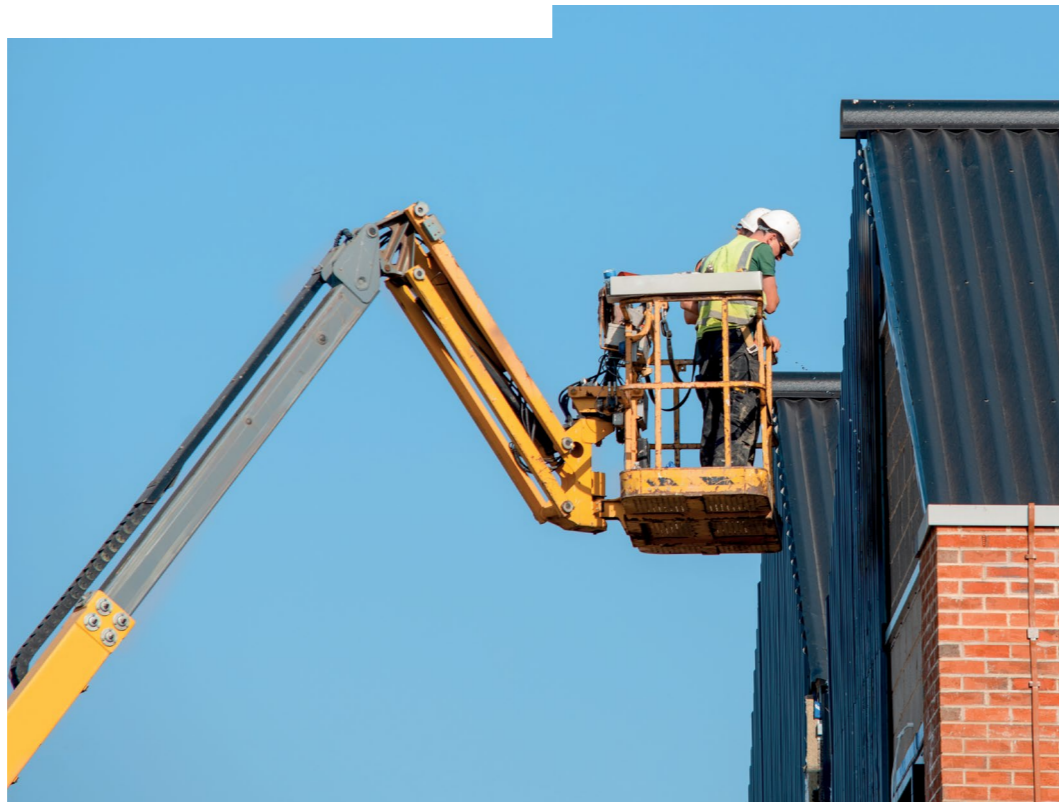
⁸ https://assets.publishing.service.gov.uk/media/65d8baed6efa83001ddcc5cd/Housebuilding_market_study_final_report.pdf

The Levelling Up and Regeneration Act ('LURA')⁹ introduced new measures aimed at build-out via the use of Commencement Notices (s111), Progress Reports (s114) and Completion Notices (s112). Regulations to determine the practicalities of these measures are awaited¹⁰ but their design and application will benefit from a sound evidence-based grasp of how strategic housing schemes are implemented.

Our research continues to focus exclusively on what has happened on the ground, how long things took and what has been built. We do not include forecasts of future delivery. Our aim is to provide real-world benchmarks to inform consideration of housing delivery trajectories. This can be particularly relevant in locations with few contemporary examples of strategic-scale development. It also provides some context for when Government considers the recommendations of the CMA.

The research excludes London because of the distinctive characteristics of housing development in the capital. However, our sample does include apartment schemes on brownfield land in regional urban centres. Recent policy shifts – increasing the focus on boosting housing supply on previously-developed sites¹¹ – mean it will become more important to understand the distinctive delivery profile of such schemes.

Finally, the housing market has taken a turn. In 2020, net housing additions in England peaked at 248,500. But in 2024, the market has stuttered with downward pressures on values and sales rates: Help to Buy closed in March 2023, mortgage rates more than doubled in 2022 and remain high and Registered Providers face challenges that limit their ability to invest in new stock. Our report considers how these headwinds may affect annual build-out rates.



⁹ <https://www.legislation.gov.uk/ukpga/2023/55/enacted>
¹⁰ The provisions require secondary legislation which, at the time of writing, has not been published and for which there is no timetable. There is also no guarantee the provisions will ever come into force. Albeit the provisions for making these regulations will come in to force on 31st March and the intentions were set out at the time the Bill was published in the supporting Further Information paper.
¹¹ Including the December 2023 changes to the NPPF, which clarify that the 35% uplift to the Standard Method in the 20 largest urban centres is expected to be delivered in those areas rather than in surrounding areas. In February 2024, the Secretary of State published the review into the London Plan and issued a consultation on 'Strengthening planning policy for brownfield development': <https://www.gov.uk/government/consultations/strengthening-planning-policy-for-brownfield-development>

02 Methodology

This report focuses analysis on the pace at which large-scale housing sites of 500 dwellings or more emerge through the planning system and how quickly they are built out. It identifies the factors which lead to faster or slower rates of delivery, including those impacting specifically on apartment schemes on brownfield sites in urban areas.

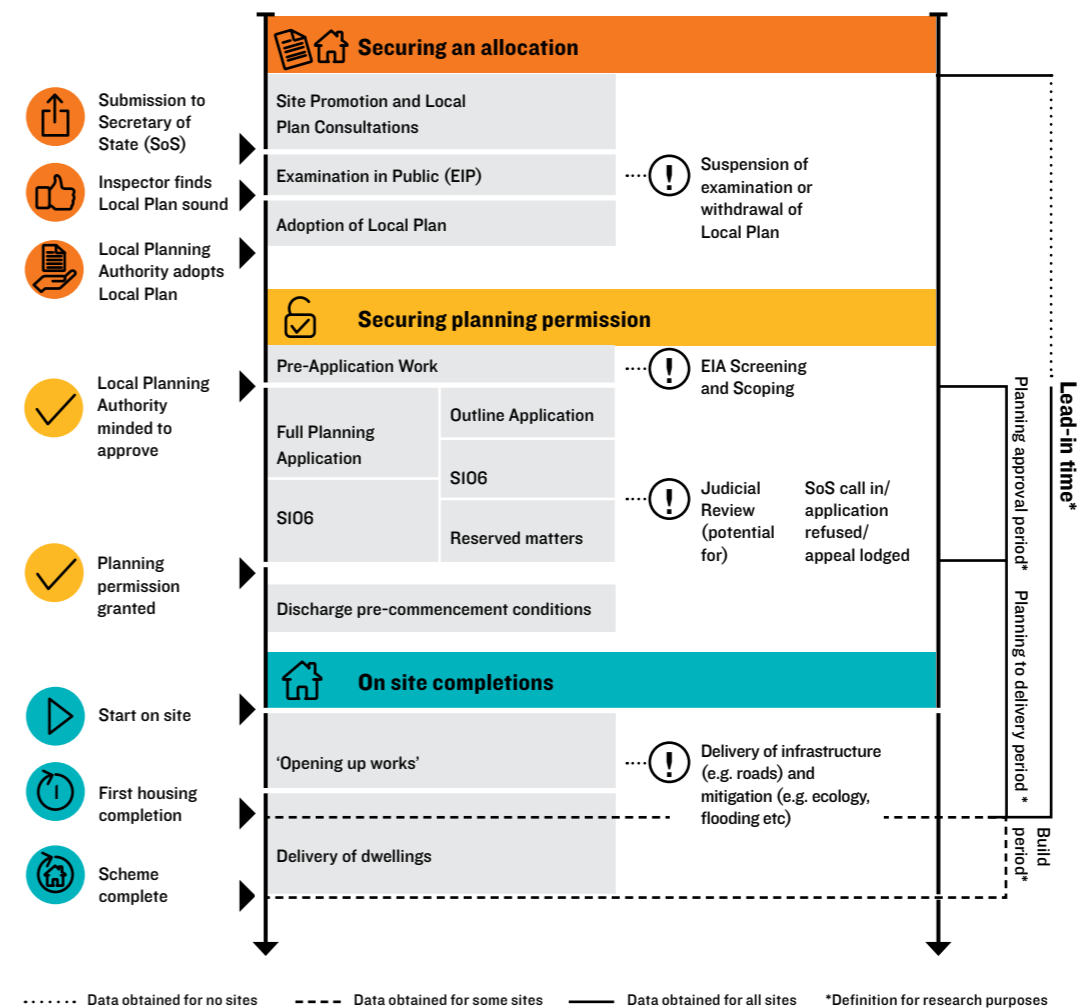
Definitions

For all sites, we look at the full extent of the planning and delivery period. To help structure

the research and provide a basis for standardised measurement and comparison, the development stages have been codified as illustrated in Figure 2.1, which remain unchanged from the previous editions of this research.

The overall 'lead-in time' covers stages associated with securing a local plan allocation, going through the 'planning approval period' and 'planning to delivery period', and ending when the first dwelling is completed. The 'build period' commences when the first dwelling is completed, denoting the end of the lead-in time.

Figure 2.1: Timeline for the delivery of large-scale housing sites



Source: Lichfields analysis

Lead-in time

Securing a development plan allocation is an important stage in the delivery of most large-scale housing sites. However, it is not possible to obtain information on a consistent basis for this process – which can often take decades across multiple plan cycles – and so we have not incorporated it in our analysis. For the purposes of this research the lead-in time reflects only the time from the start of the planning approval period up to the first housing completion.

Planning approval period

The 'planning approval period' begins with the validation date of the first planning application on the site (usually an outline application but sometimes hybrid or full) and extends until the date of the first detailed approval for dwellings on the site (either full, hybrid or reserved matters applications). It is worth noting that applications are typically preceded by significant amounts of (so-called) 'pre-app' engagement and evidence work, but due to a lack of data on these matters, it is not possible to establish a reliable estimate of the time taken on these activities (including through the local plan and pre-application). But the time taken to achieve an implementable planning permission will be markedly longer than we have identified in this study because work inevitably begins prior to the date the planning application is validated.



Planning to delivery period

The 'planning to delivery period' follows the planning approval period and measures the time from the date of the first detailed permission for construction of homes (usually reserved matters but could be a hybrid or full application) to the completion of the first dwelling. The use of the 'completion of the first dwelling' rather than 'works on site' reflects the availability of data: housing completions are routinely publicly recorded by LPAs but the commencement of work on site tends not to be. This allows for a consistent basis for measurement.

We can mostly only identify the monitoring year in which the completion took place, so the mid-point of the monitoring year has been used to calculate the end date of the planning to delivery period. For example, a scheme delivering its first unit in 2014/15 would be recorded as delivering its first unit on 1 October 2014.

For solely apartment schemes this will be slightly different as developers will typically complete an entire block on a single day. This will often mean the 'planning to delivery period' is longer as the first recorded completion for multiple apartments in a newly constructed multi-storey block would require more on-site work than required to complete a single house.

Build period

The annualised build-out rates are recorded for the development up to the latest year where data was available as of April 2023 (2022/23 in most cases). Not every site assessed will have completed its build period as many of the sites we considered had not delivered all dwellings permitted at the time of assessment; some have not delivered any dwellings.

We anticipate multi-phased apartment schemes will have more 'lumpy' completions data as entire blocks are recorded as having been completed on the same day. This could mean years with high delivery preceded and/or followed by more fallow years.

Detailed definitions of each of these stages can be found in Appendix 1.



Development and data

Our analysis focuses on larger sites of 500 or more dwellings, but we have also considered data from smaller sites ranging from 50-499 dwellings for comparison and to identify trends. The geographic distribution of sites assessed is shown in Figure 2.2 and a full list can be found in Appendix 2 (large sites) and Appendix 3 (small sites).

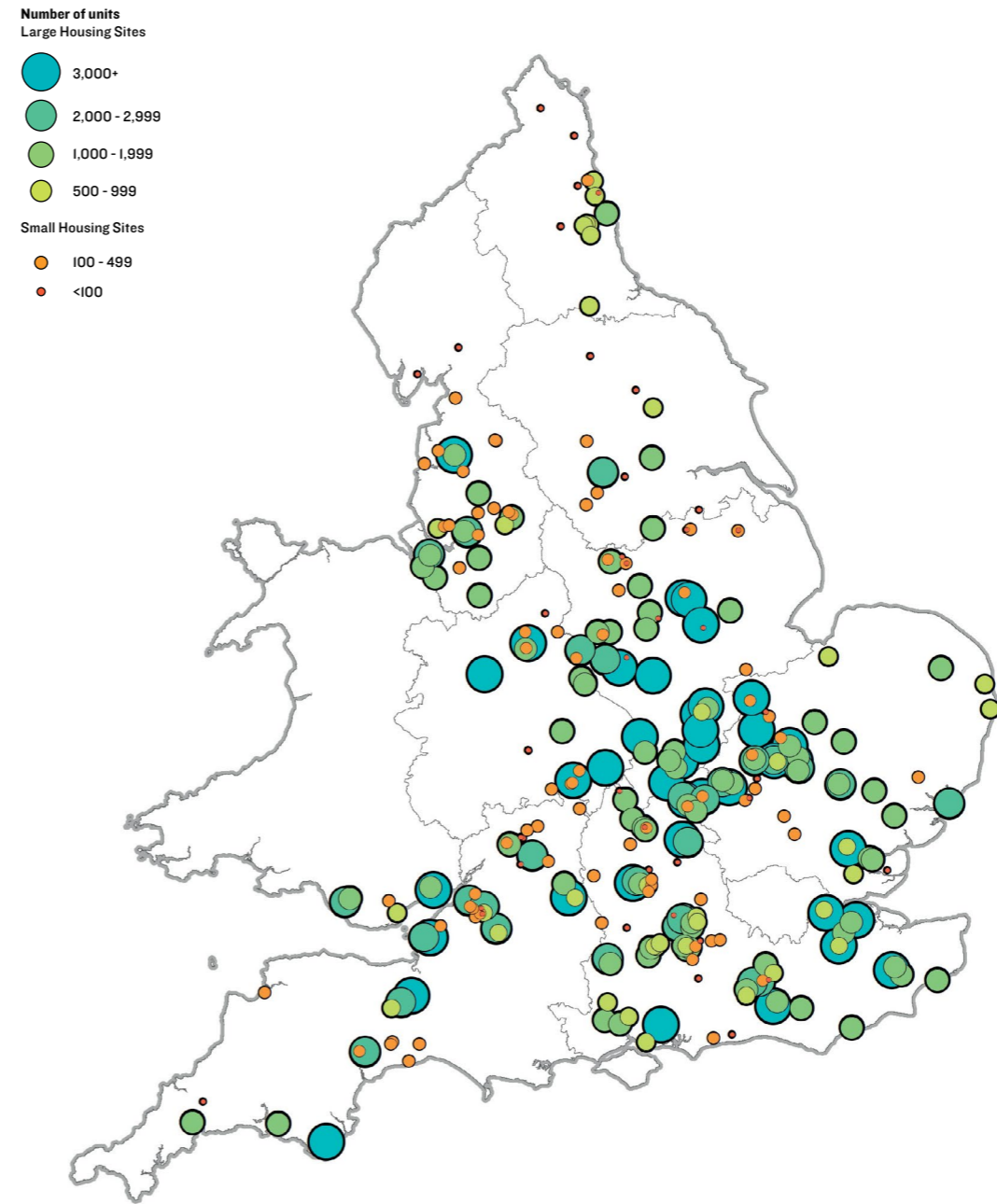
Efforts were made to cover a range of locations and site sizes in the sample, but we cannot say it is representative of the housing market throughout England and Wales. Our conclusions may not be applicable in all areas or on all sites. Our sample size has increased significantly: we now have 179 large sites (the second edition had 97) and 118 small sites (the second edition had 83). We have endeavoured to include more recent examples to ensure that the latest trends in planning determination and build-out rates for housing sites are picked up proportionally through the analysis of housing sites of all sizes.



The sources on which we have relied to secure delivery data on all sites in this research include:

1. Annual Monitoring Reports (AMRs) and other planning evidence base documents produced by LPAs¹²;
2. Contacting the relevant LPA, and in some instances the relevant County Council, to validate or update the data; and
3. In a handful of instances obtaining/confirming the information from the relevant house builders.

Figure 2.2: Map of sites assessed, by size of site (dwellings)



Source: Lichfields analysis

¹² Monitoring documents, five-year land supply reports, housing trajectories (some in land availability assessments), housing development reports and newsletters

03 How long does it take to get started?

In this section we look at lead-in times; the time it takes for large housing sites to get planning permission and begin to deliver homes on site. This includes both the 'planning approval period' and the 'planning to delivery period'.

Planning approval period

The first stage is the planning approval period: the time taken from the validation of the first application to the first detailed permission. For large sites, this period typically comprises the determination of an outline application, and then a reserved matters application (but in some cases, it may refer to a single full/hybrid application). Our data shows that the average median planning approval period generally increases in accordance with site size; for small sites of less than 100 dwellings, this is on average 1.5 years, but for sites of 1,000 dwellings or more, it takes an average of five years to obtain detailed planning permission, with minimal change in this period as site size increases above this point.

Although it takes longer to achieve a detailed planning permission on larger sites, there is not a linear relationship between size of site and time taken to secure the detailed permission. This might be because the largest sites are more likely to be allocated in adopted local plans and so the principle of development would have already been established by the time an application is submitted. In theory this would help to speed up the planning approval process but end-to-end timescales are dependent on a timely local plan system.

Table 3.1 Lower quartile, median and upper quartile planning approval period (years) by site size

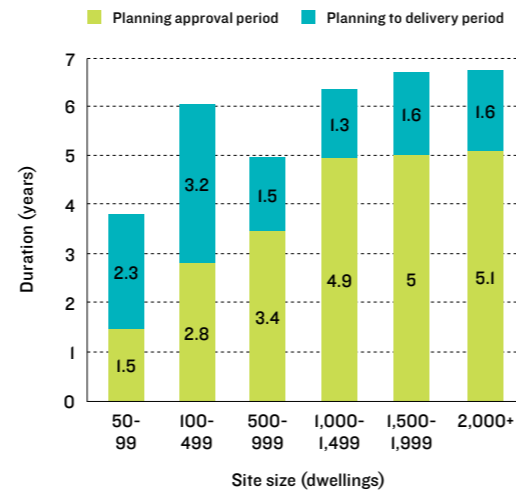
	50-99 dwellings	100-499 dwellings	500-999 dwellings	1,000-1,499 dwellings	1,500-1,999 dwellings	2,000+ dwellings
Lower Quartile	1.4	2.6	2.7	3.7	3.7	4.1
Median	1.5	2.8	3.4	4.9	5.0	5.1
Upper Quartile	5.9	9.0	6.6	8.3	6.9	7.9

Source: Lichfields analysis

In Wales, the restrictive policy towards speculative applications makes an allocation almost essential.

The CMA has also undertaken analysis into the length of time it takes land promoters and house builders to obtain outline planning permission. Using data obtained from land promoters, the CMA found that of the outline permissions obtained in 2022, 43.4% of them were obtained within five years or less, with 97.4% in nine years or less. These periods are significantly longer than the figures in our analysis because this includes pre-application promotion work, which is not captured in our data which starts with submission of the first application.

Figure 3.1 Median average timeframes from validation of the first application to completion of the first dwelling



Source: Lichfields analysis

The CMA go on to say in footnote 111 that “in estimating the development timeline, our estimate for the most comparable element of the process is, on average, 3 to 4.5 years”. This is more closely aligned to our findings on securing planning permission on a large site.

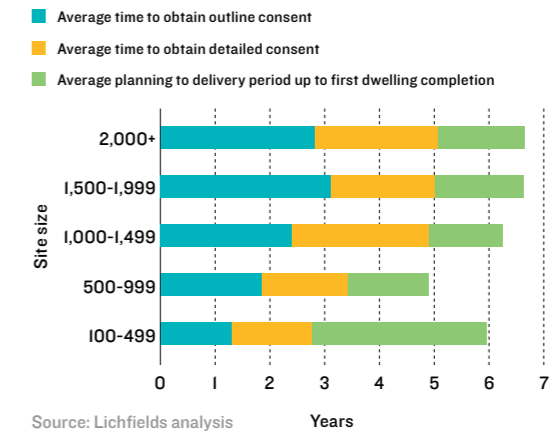
The CMA also found that the time required to make planning decisions is increasing (paragraph 4.27). However, its analysis considered developments of all sizes; we found no discernible difference in the time it takes schemes of 500 dwellings to achieve detailed approval since 2012/13 compared to older schemes. This could be because large-scale housing applications have always been more complex and so inevitably took longer to determine. They would, likely, also only be pursued by those with significant experience in this sphere. However, we did find an increase in the planning to delivery period which we discuss later in the report.

Outline permission to completion of the first dwelling

Our 2020 research was published in the aftermath of the NPPF¹³ which raised the bar on the definition of ‘deliverable’ for determining whether a site could be assumed to supply completions within the five-year housing land supply period. This definition is now well-established with the ‘clear evidence’ required to demonstrate deliverability of sites that do not benefit from a detailed permission.

We have updated our findings on the average time taken from gaining outline permission to the completion of the first dwelling on site, as shown in Figure 3.2. This indicates that it takes on average around 3 - 4.6 years from the grant of outline planning permission to deliver the first dwelling. This means at the time of its granting, an outline permission will on average deliver limited amounts of housing within the next five-year period.

Figure 3.2 Overall lead-in times for sites of 100 dwellings or more including time taken for outline consent by site size



Source: Lichfields analysis

Planning approval period: What is going on?

Larger sites are often complex and require outline permissions to set the framework for future phases or staged delivery before bringing forward a detailed scheme through reserved matters and detailed permissions.

Outline planning permissions for strategic development are often not obtained by the company that builds the houses. Master developers and land promoters play a significant role in bringing forward large-scale sites that are subsequently implemented by house builders.

Promoters will typically obtain outline planning permission and then sell the site to a house builder that will secure the detailed approvals.

The CMA explains that land promoters are contractually obligated to begin the sale of land as soon as practically possible after receiving outline planning permission. The CMA found that whilst in 2022 65% of sites sold by promoters were sold within 12 months of obtaining planning permission, their data implied a large variation in the time taken to sell a site¹⁴. Reasons included low interest in the site, protracted price negotiations, withdrawal from a sale, and multi-phased sales.

¹³ February 2019

¹⁴ CMA Housebuilding Market Report paragraphs 4.53 and 4.66-4.69

1.6 years

time taken to build the first dwelling following detailed consent on a 1,500+ dwelling scheme

Planning to delivery period

Figure 3.1 demonstrates that smaller sites in this research take longer to deliver their first dwelling than large sites, measuring the time from detailed approval being secured. Sites of 500+ dwellings take 1.3 - 1.6 years to deliver the first dwelling. By contrast sites for 50 - 99 dwellings take 2.3 years, whilst sites of 100 - 499 dwellings takes 3.2 years.

Planning to delivery period: What is going on?

There are typically complex site-specific issues such as securing statutory approvals, signing-off details, resolving land ownership and legal hurdles prior to the commencement of development.

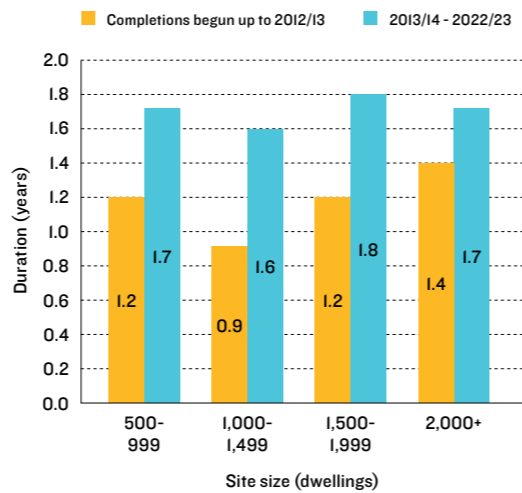
House builders must discharge pre-commencement planning conditions before constructing a home. These should be tailored to tackle specific problems but can be used broadly, for example relating to drainage, soil surveys, ecology, environmental health, materials samples, highways/ traffic plans and formalise any CIL liability.

Our 2021 research¹⁵ provided a deep dive into five local authority case studies, using their monitoring data to look at what is happening to individual planning permissions at the local level once granted. Some permissions require re-working or replanning to improve a scheme. Often these reworks – undertaken at a point at which the principle of development has already been established – will help ensure the most efficient use of land and the right scheme for the market, while also reducing planning risk for the developer. Detailed permissions are more likely to be reworked, likely reflecting their relative inflexibility compared to outline permissions. The extent of re-plans reflects the limited scope to quickly amend permitted schemes without needing to submit a new application.

Planning to delivery period over time

The planning-to-delivery period is longer for sites of all sizes in the part of our sample that started in the last decade. Figure 3.3 splits the planning to delivery analysis in Figure 3.1 by time. It shows that up until 2012/13 (just after the NPPF was first introduced), the planning to delivery period ranged between 0.9 – 1.4 years, with schemes of 2,000+ dwellings taking the longest to get started. In the period since the NPPF, the planning to delivery period has extended up to 1.6 - 1.8 years, a figure that is relatively consistent across all site sizes. The reasons for the change are not identified in the data, but may reflect the increased complexity of planning requirements as well as resourcing pressures in LPAs.

Figure 3.3 Planning to delivery period by site size



Source: Lichfields analysis

The overall lead-in time

The average time from validation of an outline application to the delivery of the first dwelling for large sites of 500 dwellings or more ranges from 4.9 to 6.7 years depending on site size, i.e. beyond an immediate five-year period for land supply calculations.

When combining the planning approval period and planning to delivery period only sites comprising 99 dwellings or less will – on average – deliver anything within an immediate five-year period. Interestingly, sites of 100 - 499 dwellings and all sites of 1,000 dwellings or more have a very similar combined planning approval and planning to delivery period of 6 - 7 years, despite significant variation in site size.

After this period, an appropriate build-out rate based on the size of the site should also be considered as part of the assessment of deliverability (see Section 4).



¹⁵ Lichfields, 2021 Tracking Progress

04 How quickly do sites build out?

The rate at which homes are to be built on sites – and the realism of housing land supply and trajectories – is often contested at local plan examinations and planning inquiries. Whilst the pressure on LPAs to maintain a five (or four¹⁶) year housing land supply may be decreasing¹⁷, the LURA contains measures that will increase scrutiny of build-out rates at the planning application stage, with the potential (at least in theory) for Completion Notices that nullify permissions when sites fall behind from their agreed delivery pace. A good understanding of real-world examples and evidence on absorption rates (see Section 5) remains essential.

Our analysis of build rate averages excludes any sites which have less than three years of completions data. This is because it is unlikely the completion figure in year one would cover a whole monitoring year, and so could distort the average for that site when considered alongside only one full year of completion data.

Some schemes do achieve very high rates of build-out in particular years (the top five annual figures were 520-620 dwellings per annum [dpa]) but this rate of delivery is not sustained (see Table 4.1). Apart from Ebbsfleet¹⁸, the peak build-out rates were anomalous. That said, the five examples in Table 4.1 remain at the upper end of (or above) the range of our overall sample: for schemes of 2,000 or more dwellings the average annual completion rate throughout build-out ranges from 100 to 188 dpa (see Figure 4.1).

Table 4.1 Peak annual build-out rates compared against average annual build-out rates on these sites

Site	Local Planning Authority	Site size (dwellings)	Peak annual build-out rate (dpa)	Average annual build-out rate (dpa)
Cambourne (original new settlement ¹⁹)	South Cambridgeshire	3,300	620	188
Ebbsfleet	Dartford	15,000	619	255
Berryfields Major Development Area (Aylesbury Garden Town)	Buckinghamshire	3,254	562	251
Great Kneighton (Clay Farm)	Cambridge	2,188	539	219
Oakley Vale	North Northamptonshire	3,100	520	162

Source: Lichfields analysis

¹⁶ See NPPF paragraph 226

¹⁷ See NPPF paragraph 76

¹⁸ Ebbsfleet has delivered a series of high annual build-out rates in the most recent five-year period: 2018/19 = 613, 2019/20 = 553, 2020/21 = 347, 2021/22 = 533 and 2022/23 = 619

¹⁹ The second edition of this research included Cambourne as an example with a total site size of 4,343 dwellings. However, in this iteration we have separated out the sites into Cambourne the original new settlement (3,300 dwellings), Upper Cambourne (950 dwellings) and Cambourne West (2,350 dwellings)

100-188 dpa

average annual build-out rate on 2,000+ dwelling scheme

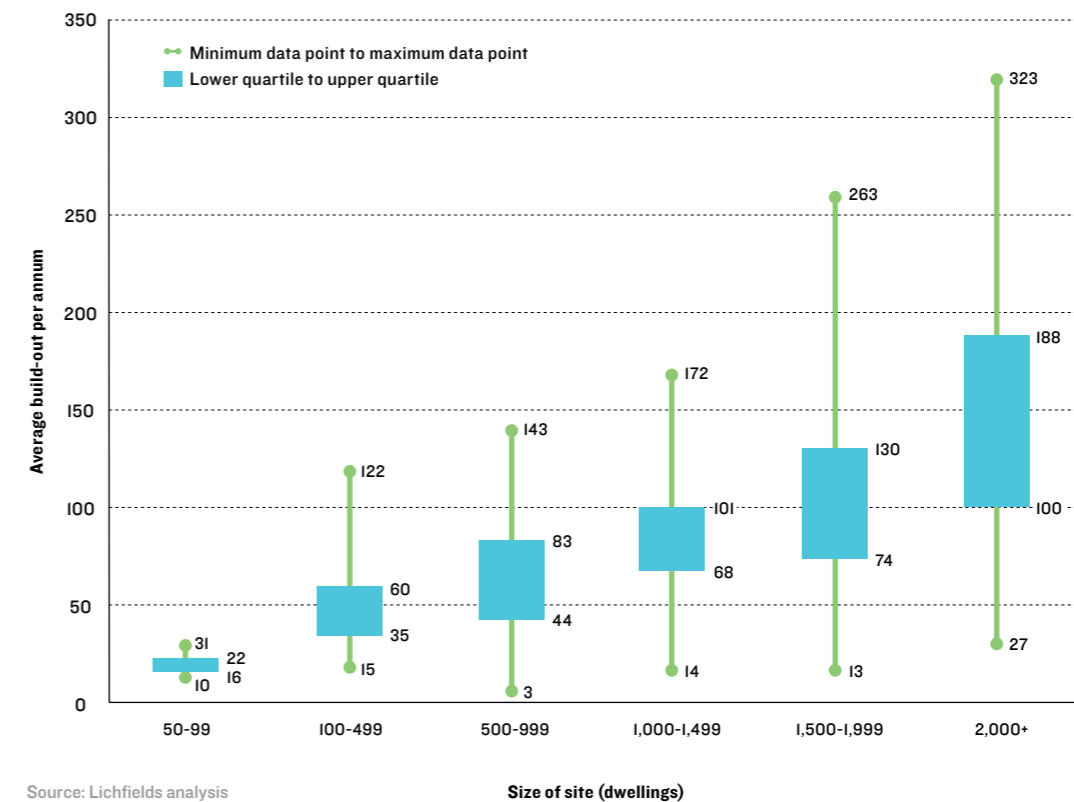
Average annual build-out rates

Figure 4.1 presents our updated results for average annual build-out rates by site size for all sites in our sample. Unsurprisingly, larger sites deliver on average more per year than smaller sites. Those of 2,000 dwellings or more, delivered on average more than twice the rate of sites of 500 - 999 dwellings.

In this third iteration of the research, we have identified the average (mean and median) build rate, but also the lower and upper quartiles to illustrate a range.

This avoids too much focus on a singular figure, recognising the wide range of factors that influence build-out rates as set out in Section 5. For sites of 2,000 or more dwellings, the lower to upper quartile range for build-out rates is 100 to 188 dpa. The highest average build-out rate in our analysis is 323 dpa, at Great Western Park, in the Vale of White Horse.

Figure 4.1: Average build-out rate by size of site (dwellings)



Source: Lichfields analysis

Comparison with our previous editions

The number of sites we have assessed is significantly increased in this edition of the research, but particularly for the largest sites (2,000+ dwellings) where we have 43 extra examples. Over the three editions of our research, the mean build-out rate has decreased marginally, whilst the median rate is also lower for sites under 999 dwellings but broadly static for sites of 1,000 dwellings or more. Overall, there is limited difference in the average build-out rates across all three editions which gives us confidence in the findings. However, it does show there a reduction in the presented build-out rates overall. We explore whether this is a function of our sample size or the addition of new years of monitoring data in Section 5.

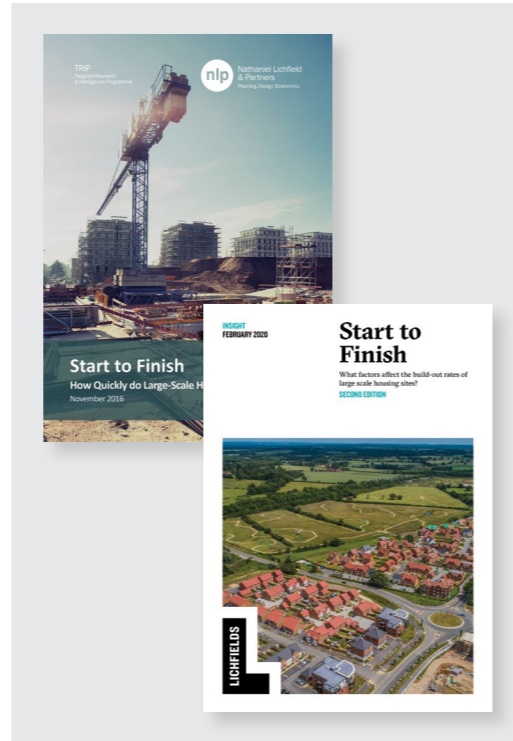


Table 4.2 Average build-out rates by size of site (dwellings) compared with the first and second editions of the research

Site Size (dwellings)	Mean build-out rate (dpa)				Median build-out rate (dpa)		
	First Edition	Second Edition	Third Edition		Second Edition	Third Edition	
50-99	27	22	20		27	18	
100-499	60	55	49		54	44	
500-999	70	68	67		73	68	
1,000-1,499	117	107	90		88	87	
1,500-1,999	129	120	110		104	104	
2,000+	161	160	150		137	138	

Source: Lichfields analysis

05 What factors can influence build-out rates?

In this section we explore some of the factors that can influence the pace at which sites are built out. This includes site and location-specific factors, such as the strength of local market, the amount of affordable housing and whether a site is greenfield or brownfield. In this third edition, we also consider the potential impact of economic and housing market cycles.

Economy and market impacts

The housing market appears to be at the start of a new economic cycle. After around a decade of generally favourable market conditions (with cheap finance and policy support) potential home purchasers and builders are facing different circumstances.

Figure 5.1 looks at how average build-out rates on our sampled sites have correlated with net additional dwellings in England and recent economic events and interventions over our study period.

Economic and policy context for house building and build-out rates

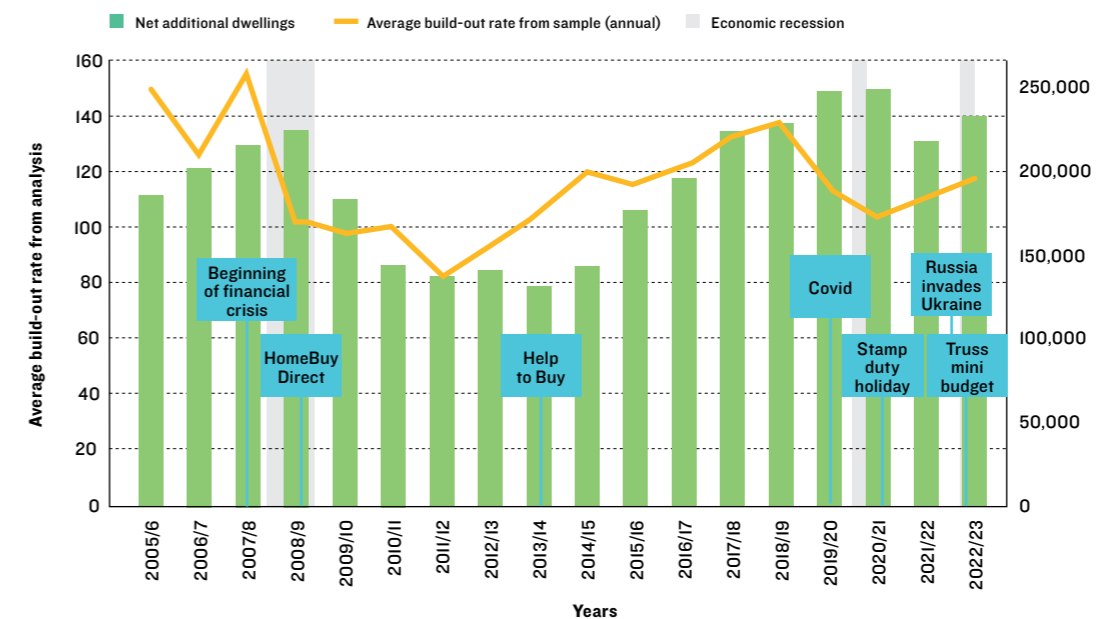
Government support for new home buyers was available before the Global Financial Crisis (GFC), (i.e. "First Buy" in 2006/7) but more robust support was introduced subsequently, firstly with Homebuy Direct, then Help to Buy which was introduced in 2013 and lasted until October 2022. It supported almost a third of new home sales over this period²⁰. COVID-19 prompted a further stimulus in the form of a stamp duty holiday (July 2020 - July 2021).

Alongside these policy measures, mortgage rates were historically and consistently low, falling to 0.5% in March 2009 and 0.1% in March 2020 before rising again from December 2021.

Combined, this provided favourable conditions for home buyers and house builders.

The end of Help to Buy in 2022 was compounded by dramatically increased mortgage rates, reaching 5.25% in August 2023. The effect to transactions has already been significant and the OBR forecast (in March 2024) that transactions in 2024 will be 14% below pre-pandemic levels (2017-2019) and will not return to this level until 2027.

Figure 5.1: Net Additional Dwellings (England) and build-out rates (England and Wales) in economic context



Sources: Lichfields analysis of build-out rates, DLUHC 2024, Increase in Dwelling stock Table I04

²⁰ <https://www.gov.uk/government/statistics/help-to-buy-equity-loan-scheme-data-to-30-september-2021/help-to-buy-equity-loan-scheme-data-to-30-september-2021#about-the-help-to-buy-equity-loan-scheme>

Looking ahead

The Bank of England estimates that (due to the increased share of fixed rate mortgages now being 85% compared to closer to 50% in 2007) “over half the impact from two years of interest rate increases is still to be felt”. This leads to the OBR forecasting a drop in housing transactions, and in housebuilding from an already low rate, to just 213,600 in 2025/26.

Worsening market conditions will likely markedly reduce build-out rates. Savills research for the LPDF ‘A New Normal for Housebuilding’ forecast fewer sales outlets (with fewer consented sites) and lower sales by outlet, dropping from the 0.73 average homes sold per week between 2015 and 2021 (and 0.67 before the 2008 recession) to 0.5 - 0.6 over the medium term, taking into account the low and falling number of consented sites in developer pipelines, and the size of each site increasing. As we show (see Figure 5.6 later in this section), a lower number of outlets is correlated with slower build-out rates. The post-2022 conditions are yet to be fully captured in monitoring data, but we would expect this to arise in future years.

There is some room for optimism. The February 2024 RICS residential survey shows sales expectations improving over the next year and a positive sentiment for new instructions of sales for the first time in three years. This is likely at least partly due to a consensus that interest rates have peaked, with UK Finance forecasting mortgage affordability is plateauing, and will improve in 2025²¹.

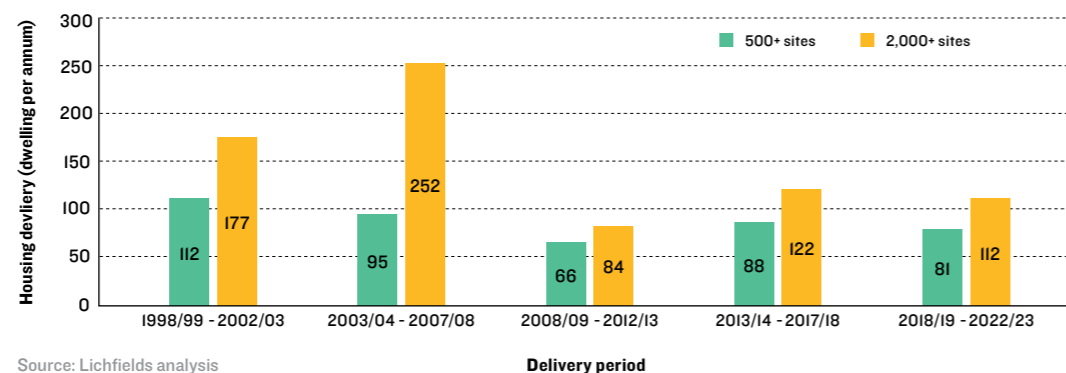
Looking back

The average build-out rates achieved on large sites (Figure 5.2) has fallen over time since before the GFC. The drop-off is most considerable for large sites starting development in the period directly after the GFC. Build out picked up slightly for projects that started in the five years to 2017/2018 taking in the impact of the 2012 NPPF. The COVID-19 pandemic and the rise in interest rates in the 2018/19 to 2022/23 period shows in the slight dip in build-out rate.

The largest sites (2,000+ dwellings) seem to have been hardest hit, falling from a peak average annual build-out of 252 dpa prior to the GFC to just 84 dpa during the recession and early recovery, before increasing again to 112 dpa in the most recent five-year period. However, the drop following 2007/8 may not be solely economically-driven; changes in the type of sites allocated, the structuring of delivery, and relying on s.106 for funding affordable housing and infrastructure may be determinative factors.



Figure 5.2: Average annual build-out rates for large sites (500 or more and 2,000 or more dwellings) by five-year interval



Source: Lichfields analysis

Site specific factors

Do homes get delivered faster in high pressure areas?

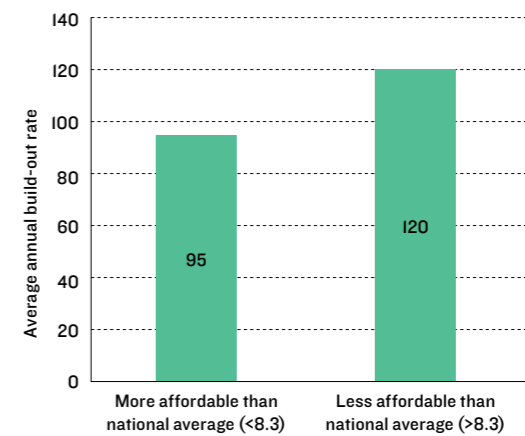
The rate at which homes can be sold (the ‘absorption rate’) determines the build-out rate. The CMA report found that there is strong evidence - from studies (including the second edition of this research) and engagement with stakeholders - that housebuilders (typically buying consented land using the residual land value method) generally respond to the incentive to sell at prevailing market value by building homes at a rate that is consistent with the local absorption rates. This avoids capital being tied up in partly finished or finished but unsold homes.

We have considered whether housing demand at the local authority level affects build-out rates. For the purposes of this research, higher demand areas are assumed to be those with a higher ratio of house prices to earnings, utilising the same measure as that applied in the Government’s standard method for assessing local housing need. Figure 5.3 shows the sample of 500 or more dwelling schemes (that have delivered for at least three years) divided between whether they are located in a local authority above or below the national median affordability ratio (8.3). It shows higher demand areas appear to absorb 26% higher annual build-out rate than lower demand areas²².

Of the five sites identified at Table 4.1 with the highest peak rates of delivery, all but Oakley Vale in North Northamptonshire are in local authority areas with workplace-based affordability ratios more than the national average when those rates were achieved²³.



Figure 5.3 Build-out rates by level of demand using national median 2022 workplace based affordability ratio (dpa)



Source: Lichfields analysis

26%

greater average annual build-out rate in higher demand areas

²² This is in line with the findings of the second edition of the research, albeit both averages are lower this time. The previous research showed the large sites in LPAs which were ‘more affordable than the national average (<8.72) delivered on average 99 dpa versus those large sites in LPAs which were ‘less affordable than the national average (>8.72) at 126 dpa

²³ Using ONS long term affordability data <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/bulletins/housingaffordabilityinenglandanddwales/2022#:~:text=ln%202022%2C%20full%2Dtime%20employees,6.2%20times%20their%20annual%20earnings>

²¹ <https://www.ukfinance.org.uk/news-and-insight/press-release/mortgage-lending-fall-in-2024>

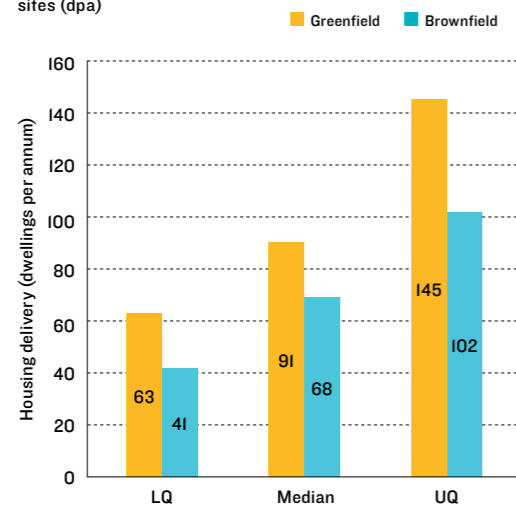
34%

greater annual average build-out rate on greenfield sites

Do sites on greenfield land deliver quicker?

Both previous editions of this research found that greenfield sites have, on average, delivered more quickly than brownfield sites. This remains the case in our updated cohort of sites. The median figures show greenfield sites delivering 34% higher average annual build-out rates. Using lower and upper quartiles to set a range, Figure 5.4 shows that brownfield sites are seen to deliver between 41 to 102 dpa compared with greenfield sites delivering 63 to 145 dpa. This is likely to reflect the fact that brownfield sites are more complex to deliver, can carry extra cost (e.g. for remediation) which reduces the scale of contribution they make to infrastructure and affordable housing provisions, which as shown in Figure 5.5, can boost build-out rates. We consider issues related to apartment-led brownfield schemes in Section 6.

Figure 5.4 Average build-out rates on greenfield and brownfield sites (dpa)



Source: Lichfields analysis

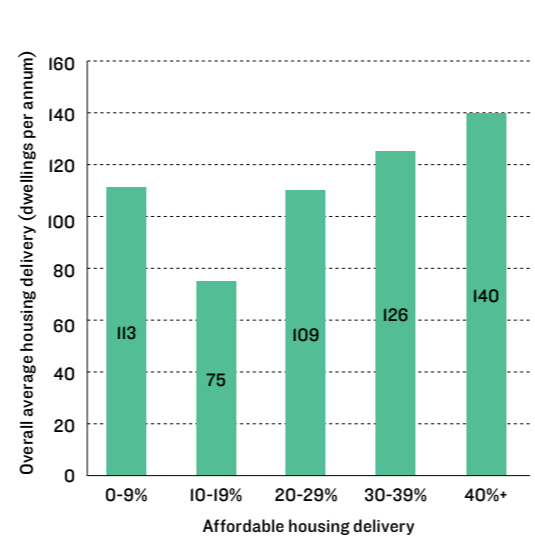
²⁴ <https://www.gov.uk/government/publications/independent-review-of-build-out-final-report>

Housing mix and variety

The Letwin Review²⁴ posited that increasing the diversity of dwellings on large sites in areas of high housing demand would help achieve a greater rate of build-out. It concluded that a variety of housing is likely to appeal to a wider, complementary range of potential customers which in turn would mean a greater absorption rate of housing by the local market.

Consistent data on the mix of sizes, types and prices of homes built out on any given site is difficult to source, so we have tested this hypothesis by using affordable housing delivery percentages on site as a marker of a different tenure and the number of sales outlets on a site as a proxy for variety of product types.

Figure 5.5 Average build-out rates by level of affordable housing (dpa)



Source: Lichfields analysis

Affordable housing

Large amounts of affordable housing on a site can boost delivery, if viable, because it taps into an additional source of demand. This is supported by our findings: schemes with the highest proportions of affordable housing (30%+) have the highest average annual build-out rates. However, there is not a direct correlation for those providing lower percentages; indeed, those providing 10-19% affordable housing had the lowest average build-out rates whereas rates on schemes delivering the lowest levels of affordable housing (i.e. less than 10% and some providing zero) were on average higher than those providing 10-29% affordable homes.

Whilst schemes with the highest rates of affordable housing achieve the highest rates, these are likely to be located in the strongest markets for homes to buy and there will, in most cases, be a cap on the proportion of affordable homes that can be achieved on sites without compromising overall viability.

Key worker housing

Among our sample of sites was a scheme delivering significant quantities of key worker housing. This specific type of housing was excluded from our wider research to avoid distorting the data.

Delivery data obtained for North West Cambridge includes annual build-out rates by the University of Cambridge and Hill Residential (Table 5.1). This suggests a specific type of product may yield high annual build-out rates with the peak year of delivery reaching 409 dwellings. The average annual build-out rate for this site is 178 dpa which is significantly higher than other schemes in the 500-999 dwellings category. However, North West Cambridge also comprises apartments which have specific delivery circumstances which make them not be readily compared to the wider research. We consider urban apartment developments on brownfield sites in Section 6.

Table 5.1 Annual build-out rates at North West Cambridge by phase

North West Cambridge	2016/17	2017/18	2018/19	2019/20	2020/21	Average Build-out Rate
Lot 1 (University of Cambridge) KEY WORKER UNITS		117				
Lot 2 (University of Cambridge) KEY WORKER UNITS			264			
Lot 3 (University of Cambridge) KEY WORKER UNITS		232				
Lot 8 (University of Cambridge) KEY WORKER UNITS	73					
Lot M1 (University of Cambridge And Hill Residential)		3	109	7	2	
Lot M2 (University of Cambridge And Hill Residential)		1	36	15	33	
Totals	73	353	409	22	35	178

Source: Lichfields analysis

²⁵ <https://www.gov.uk/government/publications/independent-review-of-build-out-final-report>

Outlets

Across the years in which the number of outlets varied on the same site we have a total of 114 data points from 15 sites. The data is limited to those local authorities that publish information relating to outlets on site. It is a small sample, but larger than that available in our second edition (12 sites, and 80 data points).

We consider the number of outlets delivering dwellings each year. For example, if two phases are being built out in parallel by the same housebuilder this has been counted as one outlet with the assumption there is little variety (although some builders may in reality differentiate their products on the same site, particularly if dual branded). However, if two phases are being built out in parallel by different housebuilders this is counted as two outlets, with the assumption that there would be some variation in the product on offer.

Figure 5.6 shows a clear relationship between the number of outlets on site and the annual build-out rate achieved. Table 5.2 also shows that, although the quantum of completions in a year increases with every additional outlet, the average delivered per outlet increases slightly with four and five outlets.

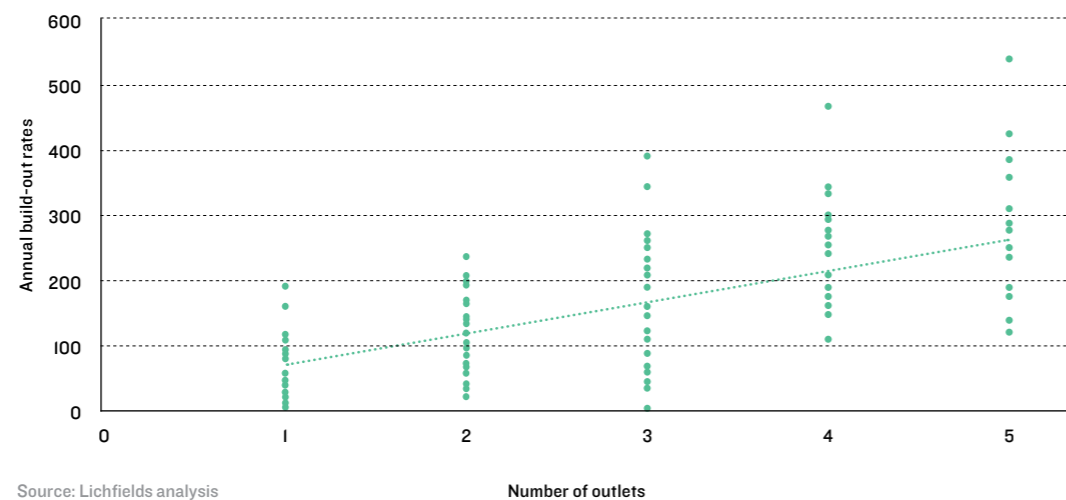
Table 5.2 Average annual completions per outlet

No of outlets	Average annual completions	Average completions per outlet
1	69	69
2	123	62
3	164	55
4	230	57
5	286	57

Source: Lichfields analysis



Figure 5.6: Build-out rates by number of outlets present (dpa)



Source: Lichfields analysis

06 Delivery of brownfield, urban apartment schemes

Government policy is seeking to increase the emphasis on brownfield residential development, and higher density, apartment schemes are likely to be a consequence. What contribution can these sites make to housing trajectories?

We have identified data for nine examples of solely apartment schemes in excess of 250 units on urban brownfield sites (all outside London). This is a reasonable number of units to differentiate sites from lower density suburban apartment developments that might appear in the research. These have been

considered separately from the other large sites in the research and include no other types of dwelling (i.e. no townhouses, semis or detached properties). Some of the large sites analysis already considered will include apartments, potentially for significant proportions of their schemes, but they will include some conventional houses.

Appendix 4 contains a short explanation of the planning history and build-out rates for each of the examples which have informed the analysis in this section. Their locations are shown on Figure 6.1.

Figure 6.1: Map of sites



Source: Lichfields analysis

Lead-in times

Whilst a modest sample size, it is immediately apparent that there is a significant extension in the time it takes for these sites to progress from planning to delivery (Table 6.1 and Figure 6.2).

When compared with comparably sized sites of conventional housing, our sample of apartment schemes have similar planning approval periods but then progressed to delivery much more slowly. This is particularly the case with the larger apartment schemes (500+ units) where the planning to delivery period for those considered was more than three times longer than the benchmarks for large conventional housing sites. For X1 Media City which is 1,100 units, it was more than seven times longer than conventional housing counterparts. Whilst one should be cautious drawing conclusions on a small sample, what might these findings imply?

1. Firstly, when recording the completion of an apartment, this will be alongside others in one or more blocks that are completed in one go, rather than an individual dwelling that can be built and sold as the site progresses. Because it is likely to take longer to complete a block of apartments than a single house. As such, the period over which we are measuring planning to completion of the first apartment will likely be longer.
2. Secondly, as set out in Appendix 4, there can be considerable time spent in 'optimising' a planning permission once the 'original' detailed consent is granted. For example:
 - **X1 Media City:** This scheme was granted detailed consent in 2007. An extension of time application for the original consent was submitted in April 2010 and approved in November 2012.

A further amendment to previously approved planning permission was approved in May 2016. First completions were recorded in 2017/18.

- **University Campus (Chelmsford):** Outline planning permission was granted at appeal in October 2003. Following a public inquiry for Stopping Up Orders and their confirmation in October 2005, the site was sold in 2007. A further process of exploring land use and design solutions to resolve commercial and planning objectives followed. Another outline and full application were approved in November 2012. First completions were recorded in 2014/15.

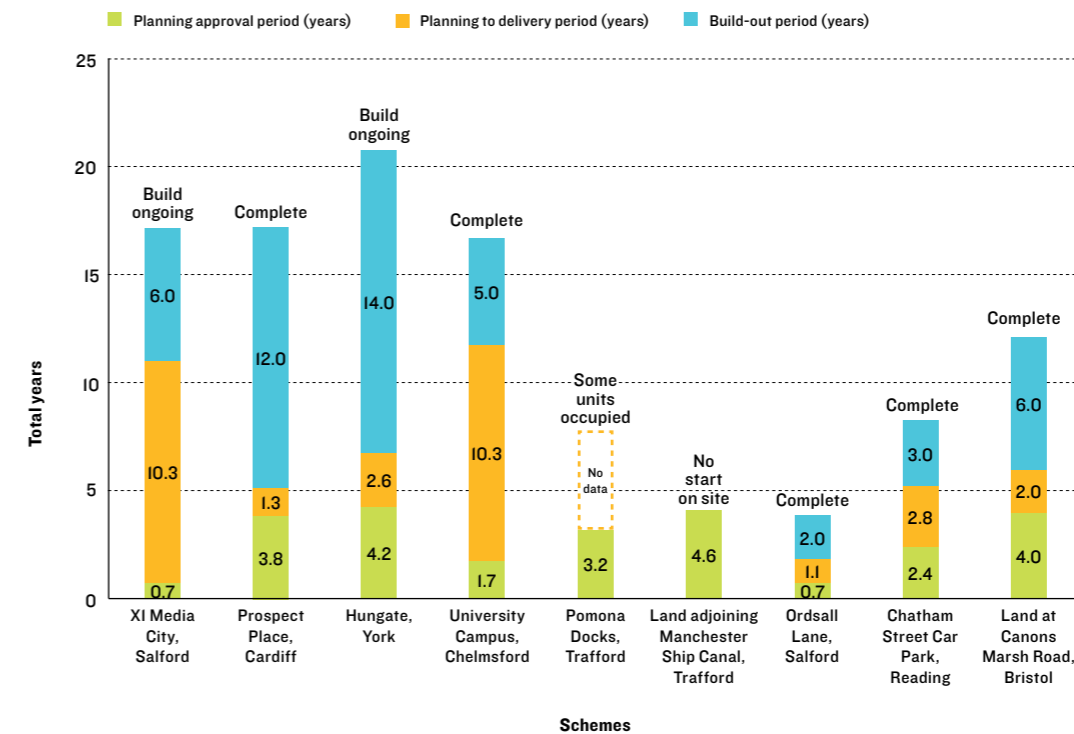
3. Thirdly, brownfield sites at scale can be complex with unusual issues to resolve. For example, Prospect Place (Cardiff) required extensive land reclamation. Further, the viability of delivering brownfield sites of this scale can be finely balanced with schemes susceptible to changes in the costs and values, necessitating redesigns prior to commencement of development.

Table 6.1 Lead-in time analysis for 9 example brownfield apartment schemes

	Site	Site Size (units)	Brownfield apartment schemes		Sites considered in sections 3 & 4	
			Planning approval period (years)	Planning to delivery period (years)	Planning approval period (years)	Planning to delivery period (years)
> 500 units	X1 Media City, Salford	1,100	0.7	10.3	4.9	1.3
	Prospect Place, Cardiff	979	3.8	1.3	3.4	1.5
	Hungate, York	720	4.2	2.6		
	University Campus, Chelmsford	645	2.7	9.0		
	Pomona Docks, Manchester	526	3.2	Unknown		
	AVERAGE			3.5	4.3	
< 500 units	Land adjoining Manchester Ship Canal, Manchester	449	4.4	Unknown	2.8	3.2
	Ordsall Lane, Salford	394	0.7	1.1		
	Land at Canons Marsh Road, Bristol	307	4.0	2.0		
	Chatham Street Car Park, Reading	272	2.4	2.8		
	AVERAGE			2.9	2.0	

Source: Lichfields analysis

Figure 6.2: Lead-in time analysis for brownfield apartment schemes



Source: Lichfields analysis

07 Conclusions

Build-out rates

As explained, the nature of apartment schemes means that annual build-out rates can be lumpy, as homes delivered can only be recorded when a block is completed. Figure 6.3 shows Prospect Place, Hungate, University Campus Chelmsford and X1 Media City with years when many units were completed with subsequent fallow periods of no delivery. Table 6.2 further illustrates this by comparing the peak year of delivery with the average rate.

Apartment schemes may also be more susceptible to downturns in the market – the ‘all or nothing’ requirement (to complete whole blocks before units can be released to prospective purchasers) ties up capital and makes them higher risk for conventional sale. For example, LPAs told us that both Prospect Place and Hungate were significantly impacted by the GFC: each having more than five years in which there were no new completions.

From our sample of nine sites, there is (perhaps unsurprisingly) much variety in the pace at which brownfield apartment schemes obtain planning permission (as there can be with greenfield sites), but more notable is how long it takes some sites to turn that consent into homes

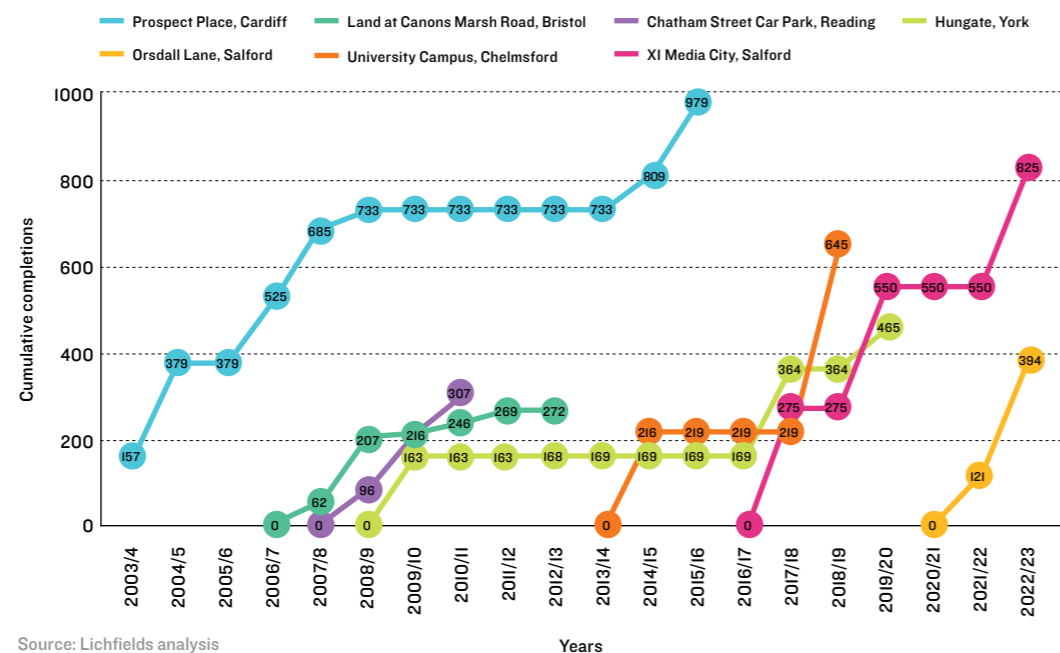
Table 6.2 Peak annual build-out rates compared against average annual build-out rates on the example urban apartment schemes

Site	Average annual build-out	Peak years build-out
Prospect Place, Cardiff	75	222
Hungate, York	33	195
University Campus, Chelmsford	129	426
X1 Media City, Salford	138	275
Chatham Street Car Park, Reading	102	120
Land at Canons Marsh Road, Bristol	45	145
Ordsall Lane, Salford	197	273

Source: Lichfields analysis

available for sale and occupation. Furthermore, while some significant ‘peak’ annual build-out rates can be achieved on these sites, delivery is lumpy and we found the GFC stalled completions on some schemes. Local authorities relying on higher density apartment schemes on brownfield sites to secure their five-year land supply or local plan housing trajectory will need to incorporate more flexibility if they are to be confident in achieving housing requirements.

Figure 6.3: Annual build-out rates for the urban apartment scheme examples (years)



Source: Lichfields analysis

Our research provides real-world benchmarks to assist planning for the effective delivery of large-scale housing. These benchmarks can be particularly helpful in locations where there is limited experience of such developments to inform housing trajectories and land supply assessments. It augments the debate on build-out rates stimulated by the CMA's work. We present some statistical averages to assist the debate, but the real relevance of our findings is that there are likely to be many factors which affect lead-in times and build-out rates, and it is these – alongside the characteristics of individual sites – that needs to be considered carefully by local authorities relying on these projects to deliver planned housing.

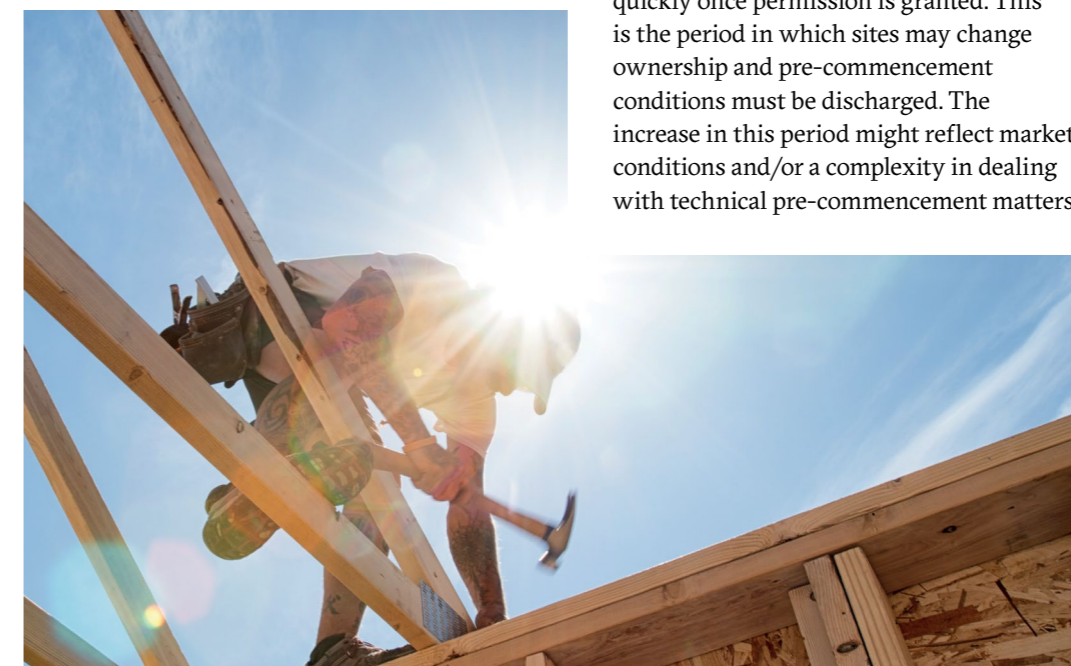
The averages presented in our analysis are not intended to be definitive or a substitute for a robust, bottom-up justification for the delivery trajectory of any given site factoring in local absorption rates. It is clear from our analysis that some sites start and deliver more quickly than the average, whilst others have delivered much more slowly. Every site is different and the range in our lower and upper quartile figures for build out illustrates the risk of relying on a singular estimate.

Key findings

1. Only sites below 100 dwellings on average begin to deliver within a five-year period from validation of an outline application

When considering our updated data on lead-in times, it shows only smaller sites with 99 dwellings or fewer will typically deliver any homes within a five-year period from the date that the first application is validated. The lead-in time comprises the planning approval period and the planning to delivery period. Even small sites make a modest contribution within five years as the lead in time is on average 3.8 years. Larger sites of 1,000 dwellings or more on average take five years to obtain detailed planning permission (the planning approval period), meaning at the time the first application is validated, no homes from that site might be expected to be delivered in the forthcoming five-year period.

The planning to delivery period is circa 1.3 – 1.6 years for all sites of 500+ dwellings and does not vary significantly according to site size. This demonstrates the truism that most sites proceed to implementation quickly once permission is granted. This is the period in which sites may change ownership and pre-commencement conditions must be discharged. The increase in this period might reflect market conditions and/or a complexity in dealing with technical pre-commencement matters.



2. Average annual build-out rates on large scale sites are lower than previous editions of this research

The build-out rates for schemes of 2,000 dwellings or more is 100 to 188 dpa using the lower and upper quartiles of our analysis. The lower and upper quartiles for every size of site category increase as they get larger. Bigger sites deliver more homes each year.

This third iteration of the research has increased our sample size, especially for the largest sites of 2,000+ dwellings (with 43 new examples). Whilst our findings remain comparable, the average rates of build out are slightly lower. The mean build-out rate has marginally decreased for every site size over the three editions of our research. For sites of 2,000+ dwellings the mean has decreased from 161 dpa to 151 dpa. For sites of under 1,000 homes, the median build-out rate is also lower. This may capture characteristics of newly surveyed sites, but also extra monitoring years since 2019 that reflect a market impacted by COVID and the Russian invasion of Ukraine. Our additional sites in the sample are also ones that tended to commence development more recently.



3. Tough market conditions mean a likely slowing in build-out rates and house building overall

Market conditions have a clear effect on house building and the build-out rates of individual schemes. It is in this context that, ceterus paribus, one might expect to see a drop in build-out rates over the next few years. Recent research for the LPDF forecast fewer sales outlets (with fewer consented sites) and lower sales by outlet. Our research shows, a lower number of outlets is likely to lead to slower build-out rates.

There is some room for optimism with the February RICS residential survey showing sales expectations improving over the next year and for the first time in three years, a positive sentiment for new instructions of sales. This is likely at least partly due to a common belief that interest rates have peaked, and mortgage affordability will improve in 2025.



4. Demand is key to maximising build-out rates

The rate at which homes can be sold (the 'absorption rate') at a market value consistent with the price paid for the land determines the build-out rate. The CMA found there is strong evidence from studies and its own engagement with stakeholders, that housebuilders generally respond to the incentive to maximise prices by building homes at a rate that is consistent with the local absorption rates.

Our analysis found that areas with a higher ratio of house prices to earnings had an average 26% higher annual build-out rates on schemes of 500+ dwellings than lower demand areas. The top four highest individual years of delivery in this research (see Table 4.1) are in local authority areas with workplace-based affordability ratios greater than the national average at the time those build-out rates were achieved.



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5. Variety is the spice of life

Additional outlets on site have a positive impact on build-out rates, although there is not a linear relationship. Schemes with most affordable housing (30% or more) built out faster, i.e. with higher average build-out rates than those with lower levels of affordable housing delivery; but those delivering 10-10% of their units as affordable had the lowest build-out rates of all. One case study example – in Cambridge – was a predominantly key worker scheme that was able to deliver at an average of 178 dpa, significantly higher than other similar sized schemes included in this research. This points to the principle – identified by the Letwin Review – that, where there is a demand, a mix of homes, complementing market housing for sale, could have a positive impact on build rates.

6. Large-scale apartment schemes on brownfield land are less predictable forms of supply

The largest apartment schemes delivered on brownfield sites appear susceptible to elongated planning-to-delivery periods compared to the benchmark averages for conventional houses on sites of similar scale. There can be protracted periods of redesign and site sale which means implementation can take longer. They can also be more susceptible to downturns in the market; two of the considered examples stalled after the GFC.

Furthermore, the nature of apartment schemes – built in blocks rather than individual dwellings – also means that annualised build-out rates can be lumpy.

Combined, these factors mean any local authority relying on brownfield apartment developments to meet its housing needs, will likely need to incorporate flexibility in its approach when arriving at a realistic housing trajectory.



Looking forward

The CMA report states at paragraph 4.138:

“While we consider that measures to speed up the pace at which new build housing is supplied to the market may be beneficial (and we set out options for some in the chapter on addressing the problems we have found), these would need to be accompanied by planning reform if they were to deliver increases in housing delivery of the size needed to bring GB housing completions significantly closer to 300,000 per year.”

The CMA’s recommendation on seeking to speed up the pace of new housebuilding should be viewed in the context of this research which, when compared with the first and second editions, shows that reported average build-out rates are slightly lower, albeit only slightly.

As we approach a general election, and with the housing crisis unresolved, the challenge of boosting housing delivery is being discussed with renewed vigour.

The CMA concludes that achieving the necessary step-change in housing output is likely to be reliant on measures to improve the efficiency of the planning system: increasing the speed at which sites progress through the planning system, and then from planning to delivery; in increasing the number of sites granted planning permission for residential development; and increasing the pace and number of development plans being prepared and reviewed. Other factors – including funding for affordable housing and to unblock barriers to site delivery – are also needed.

In the current environment, a sufficient pipeline of sites with planning status in each location (itself dependent on a functioning planning system), with a suitably varied range of housing types and tenures, and the forecast recovery of the housing market from its recent downturn are all necessary to secure a recovery in the supply of new homes.

Appendices

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- Appendix 1: Definitions and notes**
- Appendix 2: Large sites table**
- Appendix 3: Small sites tables**
- Appendix 4: Solely apartment scheme details**

Appendix 1: Definitions and notes

The 'lead-in'

Measures the period up to first completion of a house on site from the validation date of the first planning application made for the scheme. The lead-in time covers both the planning approval period and planning to delivery periods set out below. The lead-in time also includes the date of the first formal identification of the site as a potential housing allocation (e.g. in a LPA policy document), but consistent data on this for the sample is not available.

The 'planning approval period'

Measured from the validation date of the first application for the proposed development (be that an outline, full or hybrid application). The end date is the decision date of the first detailed application which permits the development of dwelling/s on site (this may be a full or hybrid application or the first reserved matters approval which includes details for housing). A measurement based on a detailed 'consent' was considered reasonable and proportionate milestone for 'planning' in the context of this research. However, this need not be the detailed scheme which is built out. Many large-scale developments are re-designed over multiple iterations before work starts on site. This can be reflected in a protracted 'planning to delivery period'.

The 'planning to delivery period'

This includes any amended or extension of time planning applications, the discharge of any pre-commencement planning conditions and any opening up works required to deliver the site. It finishes on completion of the first dwelling.

The date of the 'first housing completion'

The month and year is used where the data is available. However, in most instances the monitoring year of the first completion is all that is available and in these cases a midpoint of the monitoring period (1st October, falling halfway between 1st April and the following 31st March) is used.

The 'annual build-out rate'

Each site is taken or inferred from a number of sources. This includes Annual Monitoring Reports (AMRs) and other planning evidence base documents produced by local authorities, contacting the LPA monitoring officers or planners where necessary and in a handful of instances obtaining the information from housebuilders.

Appendix 3: Small sites tables

Site Name	Local Planning Authority	Size
Cookridge Hospital	Leeds	495
Stenson Fields	South Derbyshire	487
Farnborough Business Park	Rushmoor	476
Bickershaw Colliery, Leigh	Wigan	471
Farington Park	South Ribble	468
Kingsmead South	Milton Keynes	450
New Central	Woking	445
Former Masons Cerement Works and Adjoining Ministry of Defence Land	Mid Suffolk	437
Land at former Battle Hospital	Reading	434
Hazelwalls Uttoxeter	East Staffordshire	429
New World House	Warrington	426
Pinn Court Farm	East Devon	426
Radyr Sidings	Cardiff	421
Halifax Road	Barnsley	414
Luneside West	Lancaster	403
Campden Road	Stratford-upon-Avon	400
Chard Road, Axminster	East Devon	400
Woolley Edge Park Site	Wakefield	375
Former NCB Workshops (Portland Park)	Northumberland	357
Hampton Heights	Peterborough	350
Cholsey Meadows	South Oxfordshire	341
Dunston Lane	Chesterfield	300
Land At Dorian Road	Bristol	300
Ryebank Gate	Arun	300

Site Name	Local Planning Authority	Size
Land At Fire Service College, Moreton in Marsh	Cotswold	299
Land at Badsey Road	Wychavon	298
Land at Brookwood Farm	Woking	297
Land west of Hayne Lane, Honiton	East Devon	291
Long Marston Storage Depot Phase I	Stratford-upon-Avon	284
Land South of Park Road, Faringdon	Vale Of White Horse	277
M & G Sports Ground, Golden Yolk and Middle Farm, Badgeworth	Tewkesbury	273
Hortham Hospital	South Gloucestershire	270
Land Between A419 And A417, Kingshill North	Cotswold	270
Land off Henthorn Road	Ribble Valley	270
GCHQ Oakley - Phase I	Cheltenham	262
I28-I34 Bridge Road and Nos 1 - 4 Oldfield Road	Windsor and Maidenhead	242
Hewlett Packard (Land Adjacent To Romney House) Romney Avenue	Bristol	242
Hale Road, Wallingford	South Oxfordshire	240
Land adjacent to Tesco, Harbour Road, Seaton	East Devon	230
Hilton Lane, Worsley	Salford	209
Saxon Drive, Biggleswade	Central Bedfordshire	200
Great North Road, St. Neots	Huntingdonshire	199
Hoval Ltd North Gate	Newark and Sherwood	196
Bookbinder Lane, Prescot	Knowsley	191
Biggin Lane, Ramsey	Huntingdonshire	188
Notcutts Nursery	Cherwell	182
Land South of Inervet Campus off Brickhill Street	Milton Keynes	176

Site Name	Local Planning Authority	Size
Sellars Farm	Stroud	176
Queen Mary School	Fylde	169
Littleton Road	Salford	158
North End Road	North Somerset	154
Benson Lane, Wallingford	South Oxfordshire	150
Ottery Moor Lane (former industrial estate), Honiton	East Devon	150
London Road/ Adj. St Francis Close	East Hertfordshire	149
MR4 Site, Land off Gallamore Lane	West Lindsey	149
Doxey Road	Stafford	145
Shefford Road, Meppershall	Central Bedfordshire	145
Cornborough Road, Bideford	Torridge	143
Alfreton Road, South Normanton	Bolsover	142
Bracken Park, Land At Corringham Road	West Lindsey	141
Land at Farnham Hospital	Waverley	134
Astley Road, Huyton	Knowsley	131
North of Douglas Road, Kingswood	South Gloucestershire	131
Land to the east of Efflinch Lane	East Staffordshire	129
Land Rear Of Mount Pleasant	Cheshire West and Chester	127
Shuttlewood Road & Oxcroft Lane	Bolsover	127
Primrose Mill Site	Ribble Valley	126
Bibby Scientific Ltd	Stafford	120
Bluntisham Road, Needingworth	Huntingdonshire	120
Land Between Godsey Lane And Towngate East	South Kesteven	120
Land West Of Birchwood Road	Bristol	119

Site Name	Local Planning Authority	Size
Former Bewbush Leisure Centre Site	Crawley	112
Land South of Station Road	East Hertfordshire	111
Canon Green Drive	Salford	108
Poppy Meadow	Stratford-upon-Avon	106
Weeton Road/Fleetwood Road	Fylde	106
Salisbury Road, Hungerford	West Berkshire	100
Auction Mart	South Lakeland	95
North East Sandylands	South Lakeland	94
Parcel 4 Gloucester Business Park Brockworth	Tewkesbury	94
Land At Green Road, Reading College	Reading	93
OS Field 9972 York Road Easingwold	Hambleton	93
Land off Lower Icknield Way, Chinnor	South Oxfordshire	89
MRIO Site, Caistor Road	West Lindsey	89
The Kylins, Morpeth	Northumberland	88
Dappers Lane, Littlehampton	Arun	84
St Marys Road, Ramsey	Huntingdonshire	82
Broad Street, Clifton	Central Bedfordshire	80
Southminster Road, Burnham-On-Crouch	Maldon	80
Land at Willoughbys Bank, Alnwick	Northumberland	76
North East Area Professional Centre	Crawley	76
Cranleigh Road, Chesterfield	Chesterfield	75
Watermead, Land At Kennel Lane, Brockworth	Tewkesbury	72
Land to the North of Walk Mill Drive	Wychavon	71
Hawthorn Croft, Gainsborough	West Lindsey	69

Site Name	Local Planning Authority	Size
Former Wensleydale School, Blyth	Northumberland	68
Land at Lintham Drive, Kingswood	South Gloucestershire	68
Land off Crown Lane	Wychavon	68
Springfield Road/Caunt Road	South Kesteven	67
Land Off Cirencester Rd	Stroud	66
Land to the east of Newington Road, Stadhampton	South Oxfordshire	65
Land south of Pinchington Lane	West Berkshire	64
Iveshead Road, Shepshed	Charnwood	63
Mill Lane, Potton	Central Bedfordshire	62
Clewborough House School	Cherwell	60
Land at Prudhoe Hospital	Northumberland	60
Oxfordshire County Council Highways Depot	Cherwell	60
Hanwell Fields Development, Banbury	Cherwell	59
Land at the Beacon, Tilford Road	Waverley	59
Land To Rear Of 28 - 34 Bedale Road	Hambleton	59
Thorley Drive, Stoke-on-Trent	Staffordshire Moorlands	57
Shelford Road, Nottingham	Rushcliffe	55
Fenton Grange, Wooler	Northumberland	54
Former Downend Lower School	South Gloucestershire	52
Holme Farm	Wakefield	50
Launceston Road, Bodmin	Cornwall	50
Part SR3 Site, Off Elizabeth Close, Scotter	West Lindsey	50
Oxcroft Lane	Bolsover	50

Appendix 4: Solely apartment scheme details

XI Media City, Salford (1,100 units)	
Planning approval period	Planning Approval Period = 0.7 years 06/53636/FUL - Erection of four-26 storey buildings comprising 1036 apartments and 58,475 sq.ft of commercial space for A1,A2,A3,A4,A5,B1,D1 and D2 use together with associated car parking and alteration to existing and construction of new vehicular access Validated - 09/10/2006 Decision issued - 28/6/2007
Extended planning period	10/58887/FUL - Extension of time for implementation of planning permission 06/53636/FUL. Validated - 30/4/2010 Decision issued - 05/11/2012 15/66481/FUL - Amendment to previously approved planning permission 10/58887/FUL. Validated - 11/6/2015 Decision issued - 13/5/2016
Planning to delivery period	Planning to delivery period = 10.3 years
Build period	First completion in 2017/18. 2017/18 - 275 2018/19 - 0 2019/20 - 275 2020/21 - 0 2021/22 - 0 22/23 - 275 Works still ongoing
Notes from LPA	N/A

Prospect Place, Cardiff (979 units)	
Planning approval period	Planning Approval Period = 3.8 years Original outline application 98/425/R Validated - 14/09/1998 Decision issued - 01/03/2001 The first reserved matters application 02/00516/R Validated - 11/03/2002 Decision issued - 21/06/2002
Extended planning period	03/724/R - Reserved Matters for 99 units 03/725/R - Reserved Matters for 58 units 02/1252/R - Full application including 677 apartments 03/01973/R - Full application including 222 residential units 04/2474c - Full changes, increasing the number of flats to 931, reduced to 927 during determination and granted in Feb 2006 06/00613/c - 394 units - granted in Oct 2006
Planning to delivery period	Planning to delivery period = 1.3 years
Build period	First completion in 2003/04 2003/04 - 157 2004/05 - 222 2005/06 - 0 2006/07 - 146 2007/08 - 160 2008/09 - 48 2009/10 - 0 2010/11 - 0 2011/12 - 0 2012/13 - 0 2013/14 - 0 2014/15 - 76 2015/16 - 170
Notes from LPA	The site was 'mothballed' for some years following the financial crash/recession with the principal Tower and another waterfront block not completing until several years later. Initially, this site required extensive and fairly unique land reclamation prior to commencement.

Hungate, York (720 units)	
Planning approval period	Planning Approval Period = 4.2 years Outline application 02/03741/OUT for 720 units Validated - 6/12/02 Decision Issued - 18/07/06 The first approved reserved matters 06/02384/REMM for Phase I erection of 163 units Validated - 27/11/2006 Decision Issued - 26/02/07
Extended planning period	07/01901/REM - Phase II - 154 unit 10/02534/REMM - variation of conditions to increase from 154 to 175 flats 10/02646/FULM - Phase I conversion to 7 townhouses to 14 flats 12/02216/FULM - Phase I conversion to 6 townhouses to 12 flats 12/02282/OUTM - outline to redevelop for 720 units - extension of time to 02/03741/OUT 13/03015/FULM - Phase II 195 units 15/01709/OUTM - Outline for Blocks G and H, 86 and 101 units 17/03032/REMM - Block G 196 units 18/02946/FULM - Increasing Block D to 196 units (increase of 10 units)
Planning to delivery period	Planning to delivery period = 2.6 years
Build period	2009/10 to present. 2009/10 - 163 2010/11 - 0 2011/12 - 0 2012/13 - 5 2013/14 - 1 2014/15 - 0 2015/16 - 0 2016/17 - 0 2017/18 - 195 2018/19 - 0 2019/20 - 101 2020/21 - 0 2021/22 - 0 2022/23 - 0 Blocks D, G and H not developed out yet
Notes from LPA	Build figures provided by York Council. The Council confirmed that there has been a significant complexity in delivering this site and consequently monitoring of delivery.

Pomona Docks II, Trafford (526 units)	
Planning approval period	Planning Approval Period = 3.2 years Full application for 546 apartments (H/58948) Validated - 10/03/2004 Decision Issued - 09/05/2007
Extended planning period	The above scheme was never implemented. 93779/FUL/18 for 526 dwellings across three apartment blocks Validated - 13/03/2018 Decision Issued - 11/04/2019 This has been subject to a number of DoC/NMAs since.
Planning to delivery period	Unknown - unable to obtain completions data to identify year of first completion
Build period	Ongoing - unable to obtain completion data from the Council.
Notes from LPA	As of October 2023 advised that the first 2 towers are complete and construction is underway on the 3rd tower.

University Campus, Chelmsford (645 units)	
Planning approval period	Planning Approval Period = 1.7 years Outline 02/02073/EIA for redevelopment of 692 residential units Validated - 05/02/2003 Decision Issued (appeal) - 17/10/2003 This outline consent was subsequently varied by 04/01825/FUL, principally to provide for a phased discharge of conditions. A reserved matters application was submitted for most of the southern part of the site (04/00865/REM). Validated - 19/04/2004 Decision Issued - 08/10/2004
Extended planning period	Following a public inquiry relating to Stopping Up Orders to paths between Victoria Road South and Park Road and Parkway and Park Road and the confirmation of the Orders (October 2005 FPS/W1525/5/1 refers), the site was sold to Genesis Housing Group in 2007. A long process of exploring land use and design solutions to resolve commercial and planning objectives followed. Another outline application (11/01360/OUT) and a full application (11/01360/FUL) were both submitted for the Part full (Phase I), part outline (Phase 2) Validated - 31/08/2011 Decision Issued - 02/11/2012 A further full application (14/01470/FUL) for Phase 2 - mixed-use redevelopment including residential Validated - 09/09/14 Decision Issued - 06/02/15
Planning to delivery period	Planning to delivery period = 10 years
Build period	First completions in 2014/15 2014/15 - 216 2015/16 - 3 2016/17 - 0 2017/18 - 0 2018/19 - 426
Notes from LPA	N/A

Land adjoining Manchester Ship Canal - Trafford (449 units)	
Planning approval period	Planning Approval Period = 4.4 years Outline application for up to 550 dwellings (APP: H/OUT/68617) Validated - 24/12/2007 Decision Issued - 30/07/2010 First reserved matters application (78681/RM/2012) Validated - 12/05/2012 Decision Issued - 27/07/2012
Extended planning period	86160/OUT/15 - Application to extend the time limit for the implementation of H/OUT/68617 Validated - 09/07/2015 Decision Issued - 26/09/2019 The overall area was split between two separate sites- 'Land off Hall Lane' and 'Lock Lane'. The reserved matters application for Lock Lane concluded that only 298 dwellings would be included within the development (APP: 100110/RES/20). Validated - 17/02/2020 Decision Issued - 27/01/2021 Meanwhile, a full planning application was submitted for 151 dwellings relating to the Land off Hall Lane part of the site (APP: 100109/FUL/20) Validated - 17/02/2020 Decision Issued - 24/03/2021
Planning to delivery period	N/A - No delivery to date
Build period	None to date
Notes from LPA	N/A

Ordsall Lane, Salford (394 units)	
Planning approval period	Planning Approval Period = 0.7 years Full planning application 19/74531/FUL Validated - 13/12/2019 Decision Issued - 12/08/2020
Extended planning period	N/A
Planning to delivery period	Planning to delivery period 1.1 years
Build period	First completions in 2021/22 2021/22 - 121 2022/23 - 273 Complete in 2 years
Notes from LPA	N/A

Chatham Street Car Park, Reading (307 units)	
Planning approval period	Planning Approval Period = 2.4 years Outline application 03/00825/OUT Validated - 17/07/2003 Decision Issued - 12/10/2004 Full application 05/00849/FUL/JL for phase I comprising a mixed use development including 307 residential units Validated - 27/07/2005 Decision Issued - 29/11/2005
Extended planning period	N/A
Planning to delivery period	Planning to delivery period 2.8 years
Build period	First completions in 2008/09 2008/09 - 96 2009/10 - 120 2010/11 - 91 Complete in 3 years
Notes from LPA	N/A

Land at Canons Marsh Road, Bristol (272 units)	
Planning approval period	Planning Approval Period = 4 years Outline planning permission 01/00986/F was first resolved to be approved in October 2001 and the s.106 agreement signed in February 2003. Validation - 01/10/2001 (we do not have a validation date for 01/00986/F so we have used the committee date, as the earliest date we can obtain) Decision Issued - 01/02/2003 Phase 2 - Section 73 Permission Ref: 04/03230/X which encompassed Building 9 for residential development Validated - 30/07/2004 Decision Issued - 03/10/2005
Extended planning period	N/A
Planning to delivery period	Planning to delivery period 2 years
Build period	First completions in 2007/08 2007/08 - 62 2008/09 - 145 2009/10 - 6 2010/11 - 33 2011/12 - 23 2012/13 - 3
Notes from LPA	N/A

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Securing the right mix in residential development proposals

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APPENDIX 5. SOS LETTER TO LOCAL AUTHORITIES (30 JULY 2024)



Ministry of Housing, Communities & Local Government

Rt Hon Angela Rayner MP

*Deputy Prime Minister and Secretary of State for
Housing, Communities & Local Government*

2 Marsham Street
London
SW1P 4DF

To: all local authority Leaders in England

Cc: all local authority Chief Executives in
England

30 July 2024

Playing your part in building the homes we need

Earlier today, I set out to the House of Commons the Government's plan to build the homes this country so desperately needs. Our plan is ambitious, it is radical, and I know it will not be without controversy – but as the Prime Minister said on the steps of Downing Street, our work is urgent, and in few areas is that urgency starker than in housing.

As the Leaders and Chief Executives of England's local authorities, you know how dire the situation has become and the depth of the housing crisis in which we find ourselves as a nation. You see it as you place record numbers of homeless children in temporary accommodation; as you grapple with waiting lists for social housing getting longer and longer; and as your younger residents are priced out of home ownership.

It is because of this I know that, like every member of the Government, you will feel not just a professional responsibility but a moral obligation to see more homes built. To take the tough choices necessary to fix the foundations of our housing system. And we will only succeed in this shared mission if we work together – because it falls to you and your authorities not only to plan for the houses we need, but also to deliver the affordable and social housing that can provide working families with a route to a secure home.

To that end, and in a spirit of collaboration and of shared endeavour, I wanted to set out the principal elements of our plan – including what you can expect of the Government, and what we are asking of you.

Universal coverage of local plans

I believe strongly in the plan making system. It is the right way to plan for growth and environmental enhancement, ensuring local leaders and their communities come together to agree the future of their areas. Once in place, and kept up to date, local plans provide the stability and certainty that local people and developers want to see our planning system deliver. In the absence of a plan, development will come forward on a piecemeal basis, with much less public engagement and fewer guarantees that it is the best outcome for your communities.

That is why **our goal has to be for universal coverage of ambitious local plans as quickly as possible**. I would therefore like to draw your attention to the proposed timelines for plan-making set out in Chapter 12 of the National Planning Policy Framework (NPPF) consultation. My objective is to drive all plans to adoption as fast as possible, with the goal of achieving universal plan coverage in this Parliament, while making sure that these plans are sufficiently ambitious.

This will of course mean different things for different authorities.

- For **plans at examination** this means allowing them to continue, although where there is a significant gap between the plan and the new local housing need figure, we will expect authorities to begin a plan immediately in the new system.
- For **plans at an advanced stage of preparation** (Regulation 19), it means allowing them to continue to examination unless there is a significant gap between the plan and the new local housing need figure, in which case we propose to ask authorities to rework their plans to take account of the higher figure.
- **Areas at an earlier stage of plan development**, should prepare plans against the revised version of the National Planning Policy Framework and progress as quickly as possible.

I understand that will delay the adoption of some plans, but I want to balance keeping plans flowing to adoption with making sure they plan for sufficient housing. I also know that going back and increasing housing numbers will create additional work, which is why we will provide financial support to those authorities asked to do this. The Government is committed to taking action to ensure authorities have up-to-date local plans in place, supporting local democratic engagement with how, not if, necessary development should happen. On that basis, and while I hope the need will not arise, I will not hesitate to use my powers of intervention should it be necessary to drive progress – including taking over an authority's plan making directly. The consultation we have published today sets out corresponding proposals to amend the local plan intervention criteria.

We will also empower Inspectors to be able to take the tough decisions they need to at examination, by being clear that they should not be devoting significant time and energy during an examination to 'fix' a deficient plan – in turn allowing Inspectors to focus on those plans that are capable of being found sound and can be adopted quickly.

Strategic planning

We know however that whilst planning at the local authority level is critical, it's not enough to deliver the growth we want to see. That is why the Government was clear in the Manifesto that housing need in England cannot be met without planning for growth on a larger than local scale, and that it will be necessary to introduce effective new mechanisms for cross-boundary strategic planning.

This will play a vital role in delivering sustainable growth and addressing key spatial issues – including meeting housing needs, delivering strategic infrastructure, building the economy, and improving climate resilience. Strategic planning will also be important in planning for local growth and Local Nature Recovery Strategies.

We will therefore take the steps necessary to enable universal coverage of strategic planning within this Parliament, which we will formalise in legislation. This model will support elected Mayors in overseeing the development and agreement of Spatial Development Strategies (SDSs) for their areas. The Government will also explore the most effective arrangements for developing SDSs outside of mayoral areas, in order that we can achieve universal coverage in England, recognising that we will need to consider both the appropriate geographies to use to cover functional economic areas, and the right democratic mechanisms for securing agreement.

Across all areas, these arrangements will encourage partnership working but we are determined to ensure that, whatever the circumstances, SDSs can be concluded and adopted. The Government will work with local leaders and the wider sector to consult on, develop and test these arrangements in the months ahead before legislation is introduced, including consideration of the capacity and capabilities needed such as geospatial data and digital tools.

While this is the right approach in the medium-term, we do not want to wait where there are opportunities to make progress now. We are therefore also taking three immediate steps.

- First, in addition to the continued operation of the duty to cooperate in the current system, we are strengthening the position in the NPPF on cooperation between authorities, in order to ensure that the right engagement is occurring on the sharing of unmet housing need and other strategic issues where plans are being progressed in the short-term.
- Second, we will work in concert with Mayoral Combined Authorities to explore extending existing powers to develop an SDS.
- Third, we intend to identify priority groupings of other authorities where strategic planning – and in particular the sharing of housing need – would provide particular benefits, and engage directly with the authorities concerned to structure and support this cooperation, using powers of intervention as and where necessary.

Housing targets

Underpinning plan making – at the strategic and local level – must be suitably ambitious housing targets. That is why we have confirmed today that we intend to **restore the standard method as the required approach for assessing housing needs and planning for homes**, and reverse the wider changes made to the NPPF in December 2023 that were detrimental to housing supply.

But simply going back to the previous position is not enough, because it failed to deliver enough homes. So, we are also consulting on a **new standard method** to ensure local plans are ambitious enough to support the Government's commitment to build 1.5 million new homes over the next five years. The new method sees a distribution that will drive growth in every corner of the country. This includes a stretching yet credible target for London, with what was previously unmet need in the capital effectively reallocated to see homes built in areas where they will be delivered. The new method increases targets across all other regions relative to the existing one, and significantly boosts expectations across our city regions – with targets in Mayoral Combined Authority areas on average growing by more than 30%.

I want to be clear that local authorities will be **expected to make every effort to allocate land in line with their housing need as per the standard method**, noting it is possible to justify a lower housing requirement than the figure the method sets on the basis of local constraints on land and delivery, such as flood risk. Any such justification will need to be evidenced and explained through consultation and examination, and local authorities that cannot meet their development needs will have to demonstrate how they have worked with other nearby authorities to share that unmet need.

And we are also committed to making sure that **the right kind of homes are delivered through our planning system as quickly as possible**. That is why we are proposing to remove the prescriptive approach to affordable home ownership products, which can squeeze out Social and Affordable rent homes despite acute need. This will free authorities to secure more Social Rent homes, ensuring you get the homes you need in your local areas. We also want to promote the delivery of mixed use sites which can include a variety of ownership and rental tenures, including rented affordable housing and build to rent, and which provide a range of benefits – including creating diverse communities and supporting timely build out rates.

Green Belt and Grey Belt

If targets tell us what needs to be built, the next step is to make sure we are building in the right places. The first port of call is rightly brownfield land, and we have proposed some changes today to support such development.

But brownfield land can only be part of the answer, which is why we are consulting on changes that would see councils **required to review boundaries and release Green Belt land where necessary to meet unmet housing or commercial need**.

I want to be clear that this Government is committed to protecting nature. That is why land safeguarded for environmental reasons will maintain its existing protections. But we know that large parts of the Green Belt have little ecological value and are inaccessible to the public, and that the development that happens under the existing framework can be haphazard – too often lacking the affordable homes and wider infrastructure that communities need. Meanwhile, low quality parts of the Green Belt, which we have termed ‘grey belt’ and which make little contribution to Green Belt purposes, like disused car parks and industrial estates, remain undeveloped.

We will therefore ask authorities to prioritise sustainable development on previously developed land and other low quality ‘grey belt’ sites, before looking to other sustainable locations for meeting this need. We want decisions on where to release land to remain locally led, as we believe that local authorities are in the best position to judge what land within current Green Belt boundaries will be most suitable for development. But we also want to ensure enough land is identified in the planning system to meet housing and commercial need, and so we have proposed a clear route to bringing forward schemes on ‘grey belt’ land outside the plan process where delivery falls short of need.

To make sure development on the Green Belt truly benefits your communities, we are also **establishing firm golden rules**, with a target of at least 50% of the homes onsite being affordable, and a requirement that all developments are supported by the infrastructure needed – including GP surgeries, schools and transport links - as well as greater provision of accessible green space.

Growth supporting infrastructure

Building more homes is fundamental to unlocking economic growth, but we need to do so much more. That is why we are also proposing changes to make it **easier to build growth-supporting infrastructure** such as laboratories, gigafactories, data centres, electricity grid connections and the networks that support freight and logistics – and seeking views on whether we should include some of these types of projects in the Nationally Significant Infrastructure Projects regime.

Having ended the ban on onshore wind on our fourth day in office, we are also proposing to: boost the weight that planning policy gives to the benefits associated with **renewables**; bring larger scale onshore wind projects back into the Nationally Significant Infrastructure Projects regime; and change the threshold for solar development to reflect developments in solar technology. In addition, we are testing whether to bring a broader definition of water infrastructure into the scope of the Nationally Significant Infrastructure Projects regime.

And recognising the role that planning plays in the **broader needs of communities**, we are proposing a number of changes to: support new, expanded or upgraded public service infrastructure; take a vision-led approach to transport planning, challenging the now outdated default assumption of automatic traffic growth; promote healthy communities, in particular tackling the scourge of childhood obesity; and boost the provision of much needed facilities for early-years childcare and post-16 education.

Capacity and fees

I recognise that delivering on the above ambition will demand much from you and your teams, and your capacity is strained. We want to **see planning services put on a more sustainable footing**, which is why we are consulting on whether to use the Planning and Infrastructure Bill to allow local authorities to set their own fees, better reflecting local costs and reducing financial pressures on local authority budgets.

While legislative change is important, we also do not want to wait to get extra resource into planning departments – which is why I am consulting on increasing planning fees for householder applications and other applications, that for too long have been well below cost recovery. We know that we are asking a lot more of local authorities, and we are clear that this will only be possible if we find a way to give more resource.

It is also important that you are supported in the critical role you play when the infrastructure needed to kickstart economic growth and make Britain a clean energy superpower is being consented under the Nationally Significant Infrastructure Projects regime. I am therefore consulting on whether to make provision to allow host upper and lower tier (or unitary) authorities to recover costs for relevant services provided in relation to applications, and proposed applications, for development consent.

Social and affordable housing

Overhauling our planning system is key to delivering the 1.5 million homes we have committed to build over the next five years – but it is not enough. We need to diversify supply, and I want to make sure that you have the tools and support needed to deliver quality affordable and social housing, reversing the continued decline in stock. This is vital to help you manage local pressures, including tackling and preventing homelessness.

Within the current Affordable Homes Programme (AHP), we know that particularly outside London, almost all of the funding for the 2021-2026 AHP is contractually committed. That is why I have confirmed that we will **press Homes England and the Greater London Authority (GLA) to maximise the number of Social Rent homes in allocating the remaining funding.**

The Government will also bring forward details of future Government investment in social and affordable housing at the Spending Review, so that social housing providers can plan for the future and help deliver **the biggest increase in affordable housebuilding in a generation.** We will work with Mayors and local areas to consider how funding can be used in their areas and support devolution and local growth.

In addition, I have confirmed that the Local Authority Housing Fund (LAHF) 3 will be going ahead, with £450 million provided to councils to acquire and create homes for families at risk of homelessness. This will create over 2,000 affordable homes for some of the most vulnerable families in society.

I recognise that councils and housing associations need support to build their capacity if they are to make a greater contribution to affordable housing supply. We will set out plans at the next fiscal event to **give councils and housing associations the rent stability they need** to be able to borrow and invest in both new and existing homes, while also ensuring that there are appropriate protections for both existing and future social housing tenants.

As we work to build more affordable homes, we also need to do better at maintaining our existing stock – which is why I have announced three updates on the Right to Buy scheme:

- First, we have started to review the increased Right to Buy discounts introduced in 2012, and we will bring forward secondary legislation to implement changes in the autumn;
- Second, we will review Right to Buy more widely, including looking at eligibility criteria and protections for new homes, bringing forward a consultation also in the autumn; and
- Third, we are increasing the flexibilities that apply to how councils can use their Right to Buy receipts.

With respect to the third point, from today we are removing the caps on the percentage of replacements delivered as acquisitions (which was previously 50%) and the percentage cost of a replacement home that can be funded using Right to Buy receipts (which was also previously 50%). Councils will also now be able to combine Right to Buy receipts with section 106 contributions. These flexibilities will be in place for an initial 24 months, subject to review. My department will be writing to stock-holding local authorities with more details on the changes, and I would encourage you to make the best use of these flexibilities to maximise Right to Buy replacements and to achieve the right balance between acquisitions and new builds.

Finally, I would like to emphasise the importance of homes being decent, safe and warm. That is why this Government will introduce Awaab's Law into the social rented sector. We will set out more detail and bring forward the secondary legislation to implement this in due course. We also intend to bring forward more detail in the autumn on our plans to raise standards and strengthen residents' voices.

Next phase of reform

The action we have announced today will get us building, but as I said to the House of Commons it represents only a downpayment on our ambitions.

As announced in the King's Speech, we will introduce a Planning and Infrastructure Bill later in the first session, which will: modernise planning committees by introducing a national scheme of delegation that focuses their efforts on the applications that really matter, and places more trust in skilled professional planners to do the rest; enable local authorities to put their planning departments on a sustainable footing; further reform compulsory purchase compensation rules to ensure that what is paid to landowners is fair but not excessive; streamline the delivery process for critical infrastructure; and provide any necessary legal underpinning to ensure we can use development to fund nature recovery where currently both are stalled.

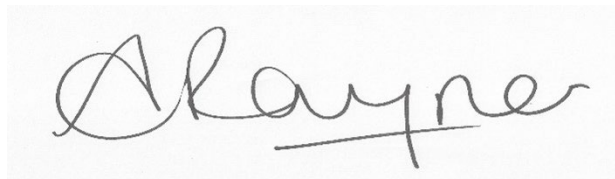
We will consult on the right approach to strategic planning, in particular how we structure arrangements outside of Mayoral Combined Authorities, considering both the right geographies and democratic mechanisms.

We will say more imminently about how we intend to deliver on our commitment to build a new generation of new towns. This will include large-scale new communities built on greenfield land and separated from other nearby settlements, but also a larger number of urban extensions and urban regeneration schemes that will work with the grain of development in any given area.

And because we know that the housing crisis cannot be fixed overnight, the Government will publish a long-term housing strategy, alongside the Spending Review, which the Chancellor announced yesterday.

We have a long way to go, but I hope today proves to be a major first step for all of us as we seek to put the housing crisis behind us. I look forward to working with you all, and am confident that together, we can achieve significant improvements that will benefit our citizens.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'ARayner', written on a light-colored background.

RT HON ANGELA RAYNER MP

Deputy Prime Minister and Secretary of State for Housing, Communities & Local Government

**APPENDIX 6. ELMBRIDGE LOCAL PLAN
INSPECTOR'S INTERIM FINDINGS
LETTER (11 SEPTEMBER 2024)**

Examination of the Elmbridge Local Plan

Inspector - C Masters MA (Hons) FRTPI

Programme Officer - Charlotte Glancy

Kim Tagliarini
Strategic Director, Place and Community
Elmbridge Borough Council
Civic Centre
High Street
Esher
KT10 9SD

11 September 2024

Dear Ms Tagliarini

Examination of the Elmbridge Local Plan

Introduction

1. Further to the close of the stage 2 hearings at the end of June 2024, I set out below my interim findings in connection with the Elmbridge Local Plan. This letter sets out my views on certain matters and what could be done to address these issues of soundness. It does not attempt to cover every matter in relation to the topics which have been covered at the hearings to date as these will be addressed within the final Inspector's Report. As this is a Plan which is being examined under the existing transitional arrangements, all paragraph references contained within this letter to the National Planning Policy Framework (the Framework) are in relation to the 2021 Framework.
2. In the first instance, I would like to thank the Council for facilitating the Stage 1 and Stage 2 hearings and for the work so far in seeking to address the matters raised throughout the examination. During these hearings, the Council have commenced a log of some of the issues relating to soundness matters that have been identified throughout the examination and upon which the Council will need to prepare additional evidence on. These matters include, but are not limited to:
 - Undertake a comprehensive call for moorings exercise and provide options for meeting the needs of boat dwellers over the plan period;
 - Update evidence on employment floorspace needs over the plan period, including having clear understanding of employment floorspace requirements as well as the impact of prior approvals on the supply of existing employment floorspace within the borough. Assess and provide options for meeting this need once it is clear what the need is and allocate sites accordingly.
3. This letter does not intend to duplicate those matters already highlighted, however it does set out my most significant concerns in relation to other matters arising, most notably the provision of and approach to housing over the plan period.
4. Since the close of the Stage 2 hearings, two important documents have been published. The first of these is the proposed consultation on the National Planning Policy Framework: draft for consultation. The consultation period for this document extends until the 24 September 2024. At this stage, the document does not constitute Government Policy or Guidance. Secondly, on the 30 July 2024 a Written Ministerial Statement (WMS) was published entitled 'Building the homes we need'. The WMS is

an expression of Government policy and is therefore capable of being a material consideration in relation to this examination. I have had regard to both of these documents in setting out my views below. In addition to these two documents, you will also be aware that the Ministry of Housing, Communities and Local Government wrote to the Planning Inspectorate on the 30 July 2024, setting out the Government's expectations in relation to local plan examinations, the approach to pragmatism and pauses to undertake additional work. This new approach applies to all plans with immediate effect. I shall return to this matter below.

5. My view is that the Plan as submitted is unsound. The Plan may be capable of being made sound through main modifications (MM's). The Council have already commenced a schedule of potential MM's which covers matters we discussed during the Stage 2 Hearings to date and the Council also have a number of action points arising from the Stage 2 Hearings. The Council should, in light of the content of this letter, reflect on the actions I have identified as necessary to make the plan sound, the timeframe for completing these additional pieces of work and the implications of this in terms of the next steps which I have set out at the end of this letter.

The Housing Requirement and policy SS3

6. As submitted, the Plan has been based on a housing requirement of 452 dpa. This means the housing requirement for the Plan period (extended to 2040 as agreed with the Council) would be 8136 dwellings. This housing requirement has been arrived at, taking into account the constraints of the borough and the conclusion that the Council do not consider that exceptional circumstances exist to warrant an amendment to the Green Belt boundary as part of this Local Plan. For the reasons I have set out within this letter, I do not consider this to be a sound approach.
7. The Council's latest housing trajectory identifies a land supply for a total of 5398 dwellings between 2022 and 2040. This is some 1387 dwellings short of the 6785 dwellings identified within policy SS3 as submitted. **The Plan would therefore result in a shortfall of some 2729 dwellings when compared to the housing requirement identified within the plan.** As drafted, the Council acknowledge that there is unmet need arising from the local plan and it is unknown how this need could be met or addressed. This presents neither a justified or effective approach to plan making.
8. The 452 dpa figure identified within the Plan falls some way below the standard method for calculating the housing requirement for Elmbridge. Utilising the standard method as the starting point, on the basis of the Council's evidence presented to date, the Local Housing Need (LHN) for Elmbridge is 650 dwellings per annum (dpa). This means that the housing requirement for the plan period would be 11700 dwellings. **Based on the Council's identified supply of 5398 dwellings, this would mean that there would be a shortfall of around 6300 dwellings over the Plan period as a whole.** This is a very significant shortfall which requires an alternative approach to meeting the housing needs of the borough over the plan period.
9. In terms of the evidence base, How the Spatial Strategy was formed (TOP001) identifies a number of key principles behind the scale and location of growth within the borough. In terms of the plan as submitted, it would neither meet the reduced housing target promoted within the submitted plan, or the housing requirement as calculated using the standard method, overall housing need, or provide the mix of

housing required to address the identified needs of the borough. Contrary to the views expressed by the Council, I do not consider that the spatial strategy adopted has achieved the correct balance between meeting housing need and the remaining key principles behind the scale and location of good growth. I shall return to the matter of the constraints within the borough and in particular the Green Belt boundaries below.

10. To summarise, the plan should be utilising the standard method as the starting point for calculating housing need. The 452 dpa is neither a justified or effective approach. As a result, as submitted, policy SS3 is not effective, justified or consistent with national policy. Using 2022 as the base date, for the Plan to be positively prepared, to address housing need over the plan period would mean the overall minimum housing requirement should be 11,700 dwellings. **This housing requirement should be clearly identified within the Plan, and the requirement should be reflected in policy SS3 which identifies the scale and location of good growth across the borough.**

Five Year Housing Land Supply Requirement

11. The Council have set out details concerning how they anticipate Five Year housing supply to be met through the Five-Year Supply statement and associated trajectory (HOU020 and HOU021). I have taken these documents into account along with the discussions held at the hearing sessions, written representations made regarding the delivery or otherwise on a number of the sites put forward, as well as the latest information presented by the Council in this regard.
12. Overall, the Council's current position is between the 5 year period of 1 April 2024 to 31 March 2029, there would be a total supply of 2027 dwellings. This means that there is a shortfall of 621 dwellings over this 5 year period against the housing requirement identified within the submitted plan, and a 2077 dwelling shortfall against the standard method requirement of 4103 for this plan period. In the context of 5 year supply, these figures represent 3.8 years and 2.4 years supply respectively.
13. The Council is not in a position to demonstrate a 5 year housing supply. In light of the above, the plan as currently drafted would therefore fail to be positively prepared. It is neither justified or effective and is inconsistent with national policy.
14. **The Plan should be modified to ensure that there are sufficient sites to provide for the minimum 5 years worth of housing against the housing requirement identified at paragraph 10 above.**

Windfall allowance

15. Based on the evidence presented within the Land Availability Assessment (HOU002), I acknowledge that some concerns have been expressed that the Council's windfall allowance will continue at the rate it has been. This is primarily because one of the main sources of supply is existing garden land which is a finite supply. Nevertheless, I consider that, in accordance with Paragraph 71 of the Framework, there is sufficient compelling evidence that windfall will continue to provide a reliable source of supply and that the 83 dpa windfall allowance which has been put forward by the Council is a justified approach. **However, in terms of the housing trajectory, windfall allowance should only be applied from year 5 onwards.**

Meeting housing supply and the approach to the Green Belt

16. In the context of delivering the homes we need, Paragraph 60 of the Framework states that in order to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. The overall aim should be to meet as much of an area's identified housing need as possible, including with an appropriate mix of housing types for the local community. I have established above that the plan as submitted would fail to do this and the housing needs will not be met by the proposed strategy contained within the submitted plan.

17. The approach to housing delivery and the spatial strategy as submitted would result in very significant shortfalls in housing delivery as I have set out within paragraphs 6 and 7 above. The Plan is submitted on the basis of a brownfield only approach to housing delivery. That is to say, housing delivery relies entirely on previously developed land or sites within the existing urban area. I recognise that the effective use of land, making as much use as possible of previously developed or brownfield land, is encouraged by the Framework. However, in this instance, the sites put forward as site allocations within the Plan only total some 1804 dwellings. This equates to a contribution of around 15% towards meeting the housing needs over the plan period, clearly an insufficient contribution. The Council have confirmed that no neighbouring authorities are able to address the unmet need arising from the plan as submitted, and that there is no plan in place to address this unmet need. This approach means the boroughs needs will not be met and the plan is not positively prepared and represents neither a justified or effective approach to plan making.

18. As matters stand, it is the Council's position that there are not exceptional circumstances to justify an amendment to the Green Belt boundaries in Elmbridge. This is notwithstanding a number of documents contained within the examination library which explain why in the view of officers, there are exceptional circumstances which would justify the amendment of these boundaries to meet LHN. Since the Plan preparation commenced, the Council have recognised that the ability of the Green Belt in Elmbridge to address housing need should be considered. Significant work has been undertaken in relation to this matter, initially through the work commissioned by the Council and completed by ARUP in both 2016 and subsequently in 2018.

19. The Exceptional Circumstances Case (OTH043) document sets out in detail the relevant case law¹ concerning the presentation of what may constitute exceptional circumstances in the case of alterations to Green Belt boundaries within a local plan. Whilst it is generally accepted that there is no definition of what constitutes exceptional circumstances, it is my assessment that in the case of Elmbridge, there are a number of factors which provide a very clear steer towards the consideration of

¹ Gallagher Homes Limited v Solihull Metropolitan Borough Council [2014] EWHC 1283 (Admin) and Calverton Parish Council v Nottingham City Council [2015] EWHC 1078 (Admin)

Green Belt sites to address the acute housing needs within the borough and the very significant shortfall in housing delivery which the plan as submitted would result in.

20. In terms of affordable housing, the plan as submitted would do little to address affordable housing needs over the plan period, in a Borough recognised as one of the most expensive places to live nationally. Elmbridge has one of the highest average house prices in the South East and affordability levels are amongst the highest within Surrey. The evidence base before me as set out within the Local Housing Needs Assessment and associated addendum (HOU004 and HOU005) identifies that in terms of affordable housing, the greatest demand for affordable homes is for units of four bedrooms or more (40%). I have not been presented with any evidence to support the Council's assertions that the focus of the plan on small urban sites (the highest majority of which would deliver 10 units or less) would assist in addressing the boroughs very acute affordable housing needs over the plan period. Conversely, the evidence base acknowledges the positive role that larger sites can play in terms of affordable housing delivery, yet the plan only seeks to deliver over 100 units on a total of 3 sites.

21. Added to the above issues concerning the quantum of housing development coming forward and the subsequent impacts on affordable housing delivery, I have significant concerns regarding the variety of land and subsequent tenure mix the submitted spatial strategy could deliver. In terms of the five year supply, the site allocations proposed by the plan would only total some 105 dwellings which would be made up from 4 sites. Beyond this first 5 years of the Plan period, only 10 of the remaining site allocations would deliver more than 50 dwellings. The highest proportion of sites coming forward (17) would be on sites less than 10 units. This approach to the site allocations as proposed would not only limit the quantum of development, but also the type and variety of housing delivery coming forward which in turn has implications for affordable housing delivery. The ability of the chosen spatial strategy to deliver a significant proportion of affordable housing is highly relevant to the consideration of whether exceptional circumstances exist, given it is acknowledged as being one of the most pressing issues which the Borough is facing².

22. The Council have also stated that the release of elements of the Green Belt would lead to unsustainable patterns of development. However, the evidence before me does not support this point of view. On the contrary, the Green Belt Boundary Review Accessibility Assessment (OTH002) paper sets out the relative sustainability of a number of the Green Belt sites assessed and subsequently discounted. A significant number of these sites are in clearly sustainable locations, (rated as excellent, good or fair) in terms of their overall accessibility performance with access to services and facilities comparable with a number of the site allocations contained within the plan as submitted.

23. In reaching the above views, I have also had regard to the Council's Topic Paper (TOP001) which sets out how the spatial strategy was formed, as well as the other evidence base documents provided by the Council namely the Green Belt Boundary Review (OTH001)³, the Green Belt Site Assessment Proformas (OTH038-OTH040), Green Belt Site Assessment Explanatory Notes (OTH041) and the GB Site

² As acknowledged within paragraphs 1.12, 2.7,2.8 of the Plan, as well as the overall Vision for Elmbridge (page 16)

³ For the sake of brevity, the full suite of evidence base document have not been listed however these include documents OTH02-OTH024 inclusive)

Assessment Explanatory notes (OTH042), the representations received at both the Regulation 19 stage as well as in written and oral form to the hearing sessions.

24. In particular, the Exceptional Circumstances Case Paper (OTH043) and the Sustainability Assessment (CD002) set out a number of options for the spatial strategy. Indeed, a number of the other options considered and subsequently discounted by the Council would in the round, enable a greater number of homes to be delivered, as well as meeting a significantly greater proportion of the Boroughs identified affordable housing needs. OTH040 identifies 12 sites considered for release under spatial strategy option 5a. These sites have been assessed as to how they fulfil the purpose on designating land as Green Belt. Furthermore, the Council, during the course of the hearing sessions also identified a further option as option 5b which set out 15 Green Belt sites in total. These options alone would deliver approximately 2900 dwellings to the overall supply.
25. The Council have repeatedly made reference to the conclusions drawn in relation to the Core Strategy Examination in support of the submitted plan. This argument is of very limited weight for a number of reasons. This examination was completed over 13 years ago. It not only predated the National Planning Policy Framework, but was a plan which was meeting its own needs in any event. As a result, there was no evidence before that Inspector regarding the role and function of the Green Belt within Elmbridge and indeed there would have been no requirement for such an exercise to be undertaken. There is also now a materially different position in terms of housing need. Bringing these factors together, I am unable to agree that the conclusions drawn at the last local plan examination should carry weight in relation to the decision to amend the boundaries now based on the latest evidence available.
26. The approach adopted would fail to deliver anything near the level of need for the plan period, and the strategy as adopted would be unsound as it would also not be effective in addressing the acute affordable housing need of the borough, including the backlog, which I shall go onto address in further detail below. Contrary to the views expressed by the Council, it is my view that the benefits of doing so would outweigh the harm to the Green Belt and as a result, exceptional circumstances do exist to warrant an element of Green Belt release. **To conclude, having taken into account the circumstances set out above, the release of an element of Green Belt land to meet the identified housing needs would be a justified and effective approach in this instance.**
27. In accordance with Paragraph 11b (i) of the Framework, I do not consider the Green Belt in Elmbridge provides a 'strong reason' for restricting the overall scale, type or distribution of development in the Plan Area. **The Council should revisit the Sustainability Appraisal, the options for meeting local housing need, the conclusions drawn in relation to the Green Belt work already completed and consideration of all alternative sites, including the potential release of Green Belt sites, to address the 6300 housing shortfall.**

Addressing affordable housing needs

28. The delivery of affordable housing is one of the most pressing issues facing the Borough and is identified as a key priority for the Council. The median work place - base affordability ratio has worsened since 2013 increasing from 13.31 to 20.02. This ranks Elmbridge as one of the least affordable boroughs in the country.

29. The evidence identifies that affordable housing need stands at 269dpa and that the backlog need for affordable housing is in the region of 1434 dwellings although I acknowledge a number of parties have expressed the view that this figure may well be higher. The evidence base states that this backlog should be addressed over a 20 year period. However, there is no justification for such an approach to be adopted and the Council have been unable to direct me to any substantive evidence to support their position in this regard. **Given the acute position regarding current affordable housing need, the scale of the backlog and the ever-worsening position regarding affordability ratios within Elmbridge, it is my view that the Council should seek to address the backlog during the plan period.**
30. Turning to consider the policy approach to affordable housing, policy HOU4 as submitted sets out the Councils approach to affordable housing. It is a detailed policy which, in the round, seeks to secure the following:
- (a) On brownfield sites of 10 or more units, on site provision of 30% affordable housing
 - (b) On greenfield sites of 10 units or more, on site provision of 40% affordable housing
 - (c) On sites of 9 units or less a financial contribution of 20% affordable housing
31. The remainder of the policy goes on to set out, amongst other things, how the on site provision will be sought, as well as how the tenure and mix of units proposed should be assessed.
32. As submitted, part c of policy HOU04 set out above seeks to secure a financial contribution equivalent to the provision of 20% affordable housing of the gross number of dwellings on sites of 9 units or less. This approach is at odds with the Framework and in particular paragraph 64 which advises that affordable housing should not be sought for residential developments that are not major developments other than in designated rural areas.
33. In order to support this policy, Topic Paper 2 concerning Affordable Housing (TOP002) sets out that without being able to collect affordable housing contributions on small sites as envisaged by part c of policy HOU4, the ability of the Council to provide affordable homes will be highly restricted. However, the evidence before the examination confirms that the existing adopted policy CS21 has secured the delivery of just 75 affordable dwellings between the April 2011-March 2012 period. Against the backdrop of some 771 affordable housing units delivered across the borough during the same period, I am unable to agree that the removal of this part of the policy would 'highly restrict' future affordable housing delivery.
34. From the evidence I have heard to date, future affordable housing delivery would be highly restricted by the chosen spatial strategy. This is because the focus of the plan is on small sites (less than 10 units) within the existing urban areas (of which now only 17 sites in total are deemed to be deliverable or developable) means that the plan will do little to secure the 30% on site affordable housing provision sought by policy HOU04 part a as currently drafted. Furthermore, as a result of the spatial strategy proposed, there would be no sites allocated within the plan to which part b of the Plan would be applicable, namely to seek 40% on site affordable housing provision on greenfield sites of 10 units or more. This is despite the fact that the evidence base recognises that such sites would be clearly capable of delivering a

greater quantum of affordable housing as set out within the Establishing Local Housing Needs Document (HOU001).

35. The Council have also sought, amongst other things, to justify this approach based on the current Core Strategy policy CS21. As you are aware, this policy was adopted in July 2011 some 13 years ago and well before the Framework against which this local plan is being assessed. Given the very acute affordable housing need within the Borough, I have considered very carefully whether the approach put forward in policy HOU4 is a sound one. The evidence presented on this issue does not support the policy approach and policy HOU04 as drafted is neither justified, effective or consistent with national policy in this regard. I am unable to conclude that such a small proportion of affordable housing delivery makes a meaningful contribution. **The Council should delete part c of policy HOU04 as well as the relevant reasoned justification⁴**

Next steps

36. I realise that this letter covers a significant number of issues which the Council will wish to reflect on, and I have identified above ways in which the problems with the Plan could be remedied.
37. As I have referenced above at paragraph 4 of this letter, the Ministry of Housing, Communities and Local Government wrote to the Planning Inspectorate last month regarding the approach to Local Plans which are likely to require changes and a pause in the examination process as a result. In the round, the letter advises that pragmatism should be used where it is likely that a plan is capable of being found sound with limited additional work to address soundness issues. Any pauses to undertake additional work should take no more than six months overall. Extensions beyond this should only be allowed at the Inspectors discretion. In agreeing extensions, the Inspector should be confident that the local authority can complete any outstanding work in the agreed timeframe.
38. I am mindful that in the case of this examination, there are a number of very significant issues to address. This includes, but is not limited to, identifying enough sites to address the shortfall, undertaking the necessary steps to appraise the sites including providing and preparing the appropriate supporting evidence, consulting upon these sites and the potential for additional hearing sessions. I have real concerns that the Council may not be able to meet this timeframe. I would therefore be grateful if in the first instance you could advise whether you consider the Council are in a position to address the necessary changes required to make the Plan sound and undertake the additional work required within a 6 month period from the date of this letter. If the Council do not consider they would be able to meet this timeframe, then the Plan should either be withdrawn or I will prepare the necessary report which would find the Plan unsound in its current format.
39. In addition, I also request that a copy of this letter is placed on the examination website as soon as possible. I am not seeking comments from other parties on the content of this letter at this time. However, should the examination proceed through to the main modifications stage then there would of course be an opportunity for parties to comment then.

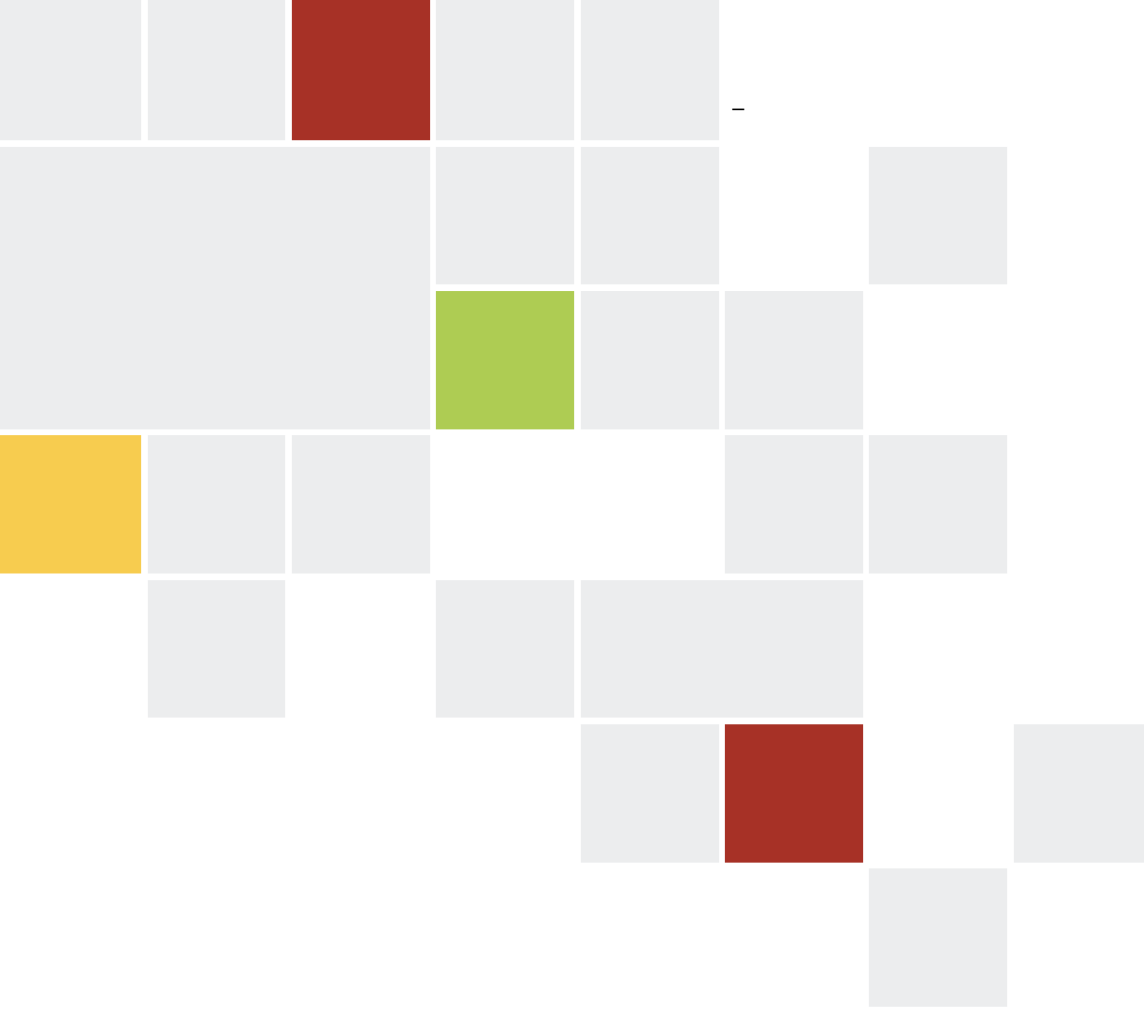
⁴ Other modifications discussed during the Matter 6 hearing sessions remain

40. I look forward to hearing from the Council once you have had an opportunity to digest the contents of this letter. Please could you provide a response no later than **2 October 2024**.

Yours sincerely

C Masters

INSPECTOR



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