

**GUILDFORD BOROUGH COUNCIL'S POSITION STATEMENT RE HOUSING TRAJECTORY AND
5YHLS AND DRAFT WORKED EXAMPLES OF HOUSING TRAJECTORY AT 594, 654 & 700
dpa**

Position Statement re: Housing Trajectory and 5YRHLS

1. In consideration of the Inspector's helpful guidance note (ID-005) and his provisional assessment, the Council would wish by way of provisional response to make three points.
2. **First**, the Council submits that consideration should still be given to its currently suggested OAN (594dpa) (or a figure in the vicinity thereof), which provides an uplift of just over **41%** above the demographic starting point, for two reasons. First, in order to assist further reflection on any final housing requirement figure and, secondly, to pay due regard to the issues of early delivery.
3. The Council makes five points. That percentage uplift (41%) is:-
 - a) at the top end of uplifts that have been considered elsewhere and well above any bench-marking exercise;
 - b) above the cap proposed for the Standard Methodology (which even if uncapped at 53% would give rise to a figure of 646dpa);
 - c) above any percentage uplift from the demographic projections proposed by any representations from housebuilders, the range being 20-40% although the preponderance of representations were nearer 25%;
 - d) far in excess of that proposed by bodies such as the Guildford Residents Association; and,
 - e) well above that for Waverley which had a worse affordability ratio.
4. The Council, whilst recognising the difficult and inter-related judgements involved in reflecting the various matters set out by the Inspector, considers that special justification would be required for any higher figure than 594dpa given in particular (b). And the higher above this figure the greater the justification needed.
5. The Council are concerned as to the justification for a higher rate than that proposed as a cap in the draft methodology (which is a material consideration at present), which is likely to be in final form before the end of the examination. In any event, in conclusion, the rate should fall at the lower end of the range (if not lower) proposed by the Inspector in his note.
6. **Second**, as to the evidence for economic uplift, the Council notes and understands the Inspector's concern about the use of snapshot forecasts (albeit the two Experian ones were two years apart) and the importance of the underlying trend. However it is important to note that: (i) the assessment GL Hearn provided for Guildford did not just depend on these forecasts but they were then taken and analysed against other employment information; (ii) no party has produced any higher forecast from any forecasting house (and they surely would have done had they existed); and, (iii)

importantly they are not a doom and gloom scenario (Guildford's relative economic buoyancy is reflected in the fact that the forecasts are for growth higher than the national or south east average).

7. It is also worth noting GL Hearn's evidence as to the rounding impact on the historic growth trend figure provided by the Housing Forum. Merely a more accurate mathematical assessment reduces the historical growth figure to 0.86% (and therefore to apply 0.85% as a growth factor would take account of very little, if any, projected downturn from historical trends).
8. The Council considers this supports the lower end of the range contemplated (0.8%) in the Inspector's note.
9. **Third**, as to Woking's need, Guildford do not propose it be ignored. The sites deleted in connection to the Reg 19 stage were deleted for a number of robust reasons, not due to lowered forecasts.
10. That said, there is currently sufficient overall supply to provide for a requirement of 700dpa (the highest figure suggested in the Inspector's note) but only across the plan period as a whole. There is no intention to reduce the overall projected level of supply. However that brings into sharp focus the issue of early delivery and 5YHLS.
11. Bearing in mind:-
 - that the plan will require as a matter of law to be reviewed in 5 years;
 - the considerable difficulties in meeting Guildford's own early years requirements; and
 - when Woking's unmet need is arising

the Council submits that the flexible element of supply Guildford intends to provide for over and above its OAN (wherever in the range of c600-650) will be capable of meeting Woking's needs (if any) that should persist at any roll forward and the Inspector can be confident as to that.

12. However, increasing Guildford's housing requirement at this stage by identifying a particular figure that will add to the burden that is required to be produced now (and would not effectively be capable of being reduced if Woking's requirements were to be reduced) is neither necessary nor justified. The exceptional circumstances justifying further green belt releases in Guildford to meet unmet need in Woking are not demonstrated given, amongst other matters, the new SNPP figures for Woking (and that the SNHP for Woking will also be out before the examination is complete) and the uncertainty that exists over the proper ambit of Woking's existing Green Belt Review.

Worked examples of housing trajectory

13. Appended to this paper are a series of draft worked examples of a housing trajectory based on an OAN of 594dpa, 654dpa and 700dpa. These are shown on both a 'Liverpool

phased' and 'Liverpool non-phased' approach. They are intended to assist with discussion at the forthcoming sessions.

14. Note, all scenarios reflect a 20% uplift for historic under delivery and by 2020/21 (the second year after the plan is adopted) the proposed supply exceeds the annual target requirement for all three OAN scenarios.

Appendix 1: Five year housing land supply – Liverpool Phased (594)

(Previously provided in GBC-LPSS-006)

	Pre-adoption				First five years					6-10 YEARS					11 - 15 YEARS					Total
	2015/2016	2016/2017	2017/2018	2018/2019	2019/2020	2020/2021	2021/2022	2022/2023	2023/2024	2024/2025	2025/2026	2026/2027	2027/2028	2028/2029	2029/2030	2030/2031	2031/2032	2032/2033	2033/2034	
Annual housing target	594	594	594	594	450	450	500	500	500	550	600	700	700	700	620	630	670	670	670	11286
Years remaining	19	18	17	16	15	14	13	12	11	10	9	8	7	6	5	4	3	2	1	
Supply	387	294	319	219	534	771	908	1152	1117	857	820	822	871	872	938	937	937	936	935	14626
Backlog/Surplus		-207	-507	-782	-1157	-1073	-752	-344	308	925	1232	1452	1574	1745	1917	2235	2542	2809	3075	
Backlog/Surplus annualised over remaining plan period		-12	-30	-49	-77	-77	-58	-29	28	93	137	182	225	291	383	559	847	1405	3075	
5 year requirement + (5x annualised backlog/surplus)	2826	2740	2737	2738	2786	2883	2939	2993	2910	2788	2636	2443	2196	1836	1343					
5 year requirement plus 20% buffer	3391	3287	3285	3286	3343	3460	3527	3592	3492	3345	3163	2931	2635	2203	1612					
5 year supply	1753	2137	2751	3584	4482	4805	4854	4768	4487	4242	4323	4440	4555	4620	4683					
5 year housing land supply	2.58	3.25	4.19	5.45	6.70	6.94	6.88	6.64	6.42	6.34	6.83	7.57	8.64	10.49	14.53					

* 180 homes per year have been minused off the annual housing target for years 11 - 15

Appendix 2: Five year housing land supply – Liverpool non-phased (594)

(Previously provided in GBC-LPSS-006)

	Pre-adoption				First five years					6-10 YEARS					11 - 15 YEARS					Total
	2015/2016	2016/2017	2017/2018	2018/2019	2019/2020	2020/2021	2021/2022	2022/2023	2023/2024	2024/2025	2025/2026	2026/2027	2027/2028	2028/2029	2029/2030	2030/2031	2031/2032	2032/2033	2033/2034	
LP requirement annualised over plan period (2015 - 34)	594	594	594	594	594	594	594	594	594	594	594	594	594	594	594	594	594	594	594	11286
Years remaining	19	18	17	16	15	14	13	12	11	10	9	8	7	6	5	4	3	2	1	
Supply	387	294	319	219	534	771	908	1152	1117	857	820	822	871	872	938	937	937	936	935	14626
Residual requirement taking account of supply to date annualised over remaining plan period	594	606	624	643	671	681	674	655	609	559	525	489	441	369	269	101	-177	-735	-2405	
5 year requirement	2970	3028	3119	3214	3356	3405	3370	3273	3046	2793	2627	2443	2204	1846	1343	506	-887	-3673	-12025	
5 year requirement plus 20% buffer	3564	3633	3743	3857	4027	4086	4044	3927	3656	3351	3152	2931	2645	2215	1612	608	-1064	-4407	-14430	
5 year supply	1753	2137	2751	3584	4482	4805	4854	4768	4487	4242	4323	4440	4555	4620	4683					
5 year housing land supply	2.46	2.94	3.67	4.65	5.57	5.88	6.00	6.07	6.14	6.33	6.86	7.57	8.61	10.43	14.53					

Appendix 3: Five year housing land supply – Liverpool Phased (654)

(Draft figures)

	Pre-adoption			First five years					6-10 YEARS					11 - 15 YEARS					Total	
	2015/2016	2016/2017	2017/2018	2018/2019	2019/2020	2020/2021	2021/2022	2022/2023	2023/2024	2024/2025	2025/2026	2026/2027	2027/2028	2028/2029	2029/2030	2030/2031	2031/2032	2032/2033		2033/2034
Annual housing target	654	654	654	654	450	450	500	500	500	550	600	700	700	700	800	810	850	850	850	12426
Years remaining	19	18	17	16	15	14	13	12	11	10	9	8	7	6	5	4	3	2	1	
Supply	387	294	319	219	534	771	908	1152	1117	857	820	822	871	872	938	937	937	936	935	14626
Backlog/Surplus		-267	-627	-962	-1397	-1313	-992	-584	68	685	992	1212	1334	1505	1677	1815	1942	2029	2115	
Backlog/Surplus annualised over remaining plan period		-15	-37	-60	-93	-94	-76	-49	6	69	110	152	191	251	335	454	647	1015	2115	
5 year requirement + (5x annualised backlog/surplus)	3066	2936	2892	2855	2866	2969	3032	3093	3019	2908	2949	2953	2907	2756	2483					
5 year requirement plus 20% buffer	3679	3523	3471	3426	3439	3563	3638	3712	3623	3489	3539	3543	3489	3307	2980					
5 year supply	1753	2137	2751	3584	4482	4805	4854	4768	4487	4242	4323	4440	4555	4620	4683					
5 year housing land supply	2.38	3.03	3.96	5.23	6.52	6.74	6.67	6.42	6.19	6.08	6.11	6.27	6.53	6.99	7.86					

*Annual housing target as per Submission Local Plan

Appendix 4: Five year housing land supply – Liverpool non-phased (654)

(Draft figures)

	Pre-adoption				First five years					6-10 YEARS					11 - 15 YEARS					Total	
	2015/2016	2016/2017	2017/2018	2018/2019	2019/2020	2020/2021	2021/2022	2022/2023	2023/2024	2024/2025	2025/2026	2026/2027	2027/2028	2028/2029	2029/2030	2030/2031	2031/2032	2032/2033	2033/2034		
LP requirement annualised over plan period (2015 - 34)	654	654	654	654	654	654	654	654	654	654	654	654	654	654	654	654	654	654	654	654	12426
Years remaining	19	18	17	16	15	14	13	12	11	10	9	8	7	6	5	4	3	2	1		
Supply	387	294	319	219	534	771	908	1152	1117	857	820	822	871	872	938	937	937	936	935		14626
Residual requirement taking account of supply to date annualised over remaining plan period	654	669	691	714	747	762	762	750	713	673	652	631	604	559	497	386	203	-165	-1265		
5 year requirement	3270	3344	3454	3571	3736	3812	3808	3748	3565	3363	3260	3155	3019	2796	2483	1931	1013	-823	-6325		
5 year requirement plus 20% buffer	3924	4013	4145	4285	4483	4574	4570	4497	4277	4035	3912	3786	3622	3355	2980	2318	1216	-987	-7590		
5 year supply	1753	2137	2751	3584	4482	4805	4854	4768	4487	4242	4323	4440	4555	4620	4683						
5 year housing land supply	2.23	2.66	3.32	4.18	5.00	5.25	5.31	5.30	5.24	5.26	5.53	5.86	6.29	6.89	7.86						

Appendix 5: Five year housing land supply – Liverpool Phased (700)

(Draft figures)

	Pre-adoption				First five years					6-10 YEARS					11 - 15 YEARS					Total
	2015/2016	2016/2017	2017/2018	2018/2019	2019/2020	2020/2021	2021/2022	2022/2023	2023/2024	2024/2025	2025/2026	2026/2027	2027/2028	2028/2029	2029/2030	2030/2031	2031/2032	2032/2033	2033/2034	
Annual housing target	700	700	700	700	450	450	500	500	500	550	600	700	700	700	938	948	988	988	988	13300
Years remaining	19	18	17	16	15	14	13	12	11	10	9	8	7	6	5	4	3	2	1	
Supply	387	294	319	219	534	771	908	1152	1117	857	820	822	871	872	938	937	937	936	935	14626
Backlog/Surplus		-313	-719	-1100	-1581	-1497	-1176	-768	-116	501	808	1028	1150	1321	1493	1493	1482	1431	1379	
Backlog/Surplus annualised over remaining plan period		-17	-42	-69	-105	-107	-90	-64	-11	50	90	129	164	220	299	373	494	716	1379	
5 year requirement + (5x annualised backlog/surplus)	3250	3087	3011	2944	2927	3035	3102	3170	3103	3000	3189	3344	3453	3461	3357					
5 year requirement plus 20% buffer	3900	3704	3614	3533	3512	3642	3723	3804	3723	3599	3827	4012	4143	4153	4028					
5 year supply	1753	2137	2751	3584	4482	4805	4854	4768	4487	4242	4323	4440	4555	4620	4683					
5 year housing land supply	2.25	2.88	3.81	5.07	6.38	6.60	6.52	6.27	6.03	5.89	5.65	5.53	5.50	5.56	5.81					

* 138 homes per year have been added to the annual housing target for years 11 - 15

Appendix 6: Five year housing land supply – Liverpool non-phased (700)

(Draft figures)

	Pre-adoption				First five years					6-10 YEARS					11 - 15 YEARS					Total
	2015/2016	2016/2017	2017/2018	2018/2019	2019/2020	2020/2021	2021/2022	2022/2023	2023/2024	2024/2025	2025/2026	2026/2027	2027/2028	2028/2029	2029/2030	2030/2031	2031/2032	2032/2033	2033/2034	
LP requirement annualised over plan period (2015 - 34)	700	700	700	700	700	700	700	700	700	700	700	700	700	700	700	700	700	700	700	13,300
Years remaining	19	18	17	16	15	14	13	12	11	10	9	8	7	6	5	4	3	2	1	
Supply	387	294	319	219	534	771	908	1152	1117	857	820	822	871	872	938	937	937	936	935	14626
Residual requirement taking account of supply to date annualised over remaining plan period	700	717	742	769	805	825	829	822	792	760	749	740	729	705	671	605	494	273	-391	
5 year requirement	3500	3587	3711	3844	4027	4124	4145	4112	3962	3800	3746	3701	3643	3524	3357	3024	2470	1363	-1955	
5 year requirement plus 20% buffer	4200	4304	4454	4613	4832	4949	4974	4934	4754	4559	4495	4442	4371	4229	4028	3629	2964	1635	-2346	
5 year supply	1753	2137	2751	3584	4482	4805	4854	4768	4487	4242	4323	4440	4555	4620	4683					
5 year housing land supply	2.09	2.48	3.09	3.89	4.64	4.85	4.88	4.83	4.72	4.65	4.81	5.00	5.21	5.46	5.81					