

2. Calculation of the Objectively Assessed Need for Housing (OAN)

Are the calculations contained in the West Surrey SHMA Guildford Addendum Report an appropriate basis for establishing the OAN for Guildford? Relevant elements include:

- 2.1 Migration trends and unattributable population change.
- 2.2 Student migration and its impact on the housing market.
- 2.3 Market signals and the issue of housing affordability.
- 2.4 The need for affordable housing.
- 2.5 Employment growth.
- 2.6 Any other relevant matter.

2.1.1 As set out in our reps of July 2017 the main area of dispute with GBC is over the uplift to be accommodated to address affordable housing and market signals. In our opinion the uplift to address affordable housing and market signals should be circa 25% not the 9% GBC advocate. This level of uplift would, together with an uplift of +23dpa to accommodate student growth would result in an OAN of 746dpa, to which the unmet needs of Woking and London would then be added. An OAN of circa 746dpa is, we note less than the figure of 798dpa which the new standard methodology recently consulted upon by the government would suggest for the area, but comparable when the unmet needs of Woking and London are provide for.¹

2.1.2 The 2017 SHMA indicates a net annual affordable housing need of 517dpa, which, based on the likely level of delivery (at 40%), would require the plan to deliver over 1,200dpa. Whilst we are not advocating this level of housing be delivered in Guildford, this together with the deterioration in the affordability ratio between 2014 and 2016, provides a strong and clear justification for increasing the OAN and housing delivery above that in the 2017 SHMA Update.

2.1.4 In addition to the above PPG indicates in paragraph 2a-015 that some adjustments may need to be made to take account of the fact that failure to meet housing needs in the past has suppressed household formation resulting in a lower level of household growth. In our response to question 5 we have provided a table that sets out GBC's housing delivery since 2006. As can be seen the cumulative shortfall against the submitted plan is significant.

2.1.5 The PPG (ID2a-019) is clear that past under delivery should be reflected within the market signals adjustment made within the OAN (the 'rate of delivery' signal). Such past under-delivery also affects the other market signals indicators and together they inform the level of market signals uplift to be applied; a properly derived OAN will already reflect past under-delivery.

2.1.6 Whilst this would suggest that an adjustment to the demographic projection is appropriate, any adjustment to address a) suppressed household formation and b)

¹ We note the Guildford Housing Forum figure of 733dpa based upon the updated 2014 sub national population projections and can confirm we are happy to work to this figure and thus a Market Signals OAN of 13,927 over the plan period. To this end we also note that since July last year updated Mid-Year Population Estimates have been published. These have since been revised in March 2018 which results in a base figure of 567 rather than the 577 we used in our July 2017 reps, hence the new figure of 733 dpa (567 x 25% + 23)

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market signals and affordability of housing, should be set at a scale which addresses both of these symptoms of poor housing delivery.

3. Unmet Need in the Housing Market Area (HMA)

Is the plan sound in not making any allowance for unmet need arising elsewhere in the HMA? Relevant aspects include:

3.1 The allowance of 83 dpa already contained within the Waverley Local Plan.

3.2 The constraints imposed by Green Belt and other designations, and the fact that it appears necessary for the plan to release substantial sites from the Green Belt in order to meet its own identified OAN.

3.3 Any other unmet need issues.

Woking's Unmet Need

- 3.1.1 In our reps of July 2017 we suggested that GBC should as a minimum accommodate 60% of the remaining unmet need for Woking i.e. 945 dwellings across the whole of the plan period (circa 50dpa).² We also highlighted the fact that notwithstanding para 4.49 of the June 2017 topic paper on the DTC, that said Topic Paper was based upon GBC providing for 693 homes per annum not the 654 now proposed. Whilst an updated DTC Topic Paper has been published, we note that no resolution to this issue has occurred. Paras 4.61 – 4.62 are clear that '*Guildford has submitted a plan that meets its own OAN and **will seek to demonstrate at Examination that it cannot meet any of the remaining unmet need within the HMA before 2027***'; and that '*All three local planning authorities acknowledge the need to work together to ensure that as far as possible, and subject to policies in the NPPF, housing needs across the HMA as a whole are met*'.
- 3.1.2 In their response to the Inspector's initial questions GBC suggested they cannot meet Woking's unmet need because:
- Guildford is too constrained to meet said need;
 - Guildford cannot meet any of Woking's unmet need until beyond Woking's plan period given projected delivery rates; and
 - The scale of the unmet need has changed/ reduced since the Woking plan was adopted.
- 3.1.3 GBC's assertion that it is not sustainably for them to accommodate any unmet need arising from Woking as this will lead to additional GB releases muddles the need to identify the need and the next stage of the process – to ascertain whether it is possible to meet that need. The council's decision to provide no additional housing over and above the 654 figure to address the unmet needs of Woking needs to be justified if the plan is to be seen to be **positively prepared, effective and consistent with national policy**. In this respect we would suggest that rather than release further GB land GBC could look to the countryside beyond the GB in reviewing its ability to accommodate additional growth to help meet Woking's unmet need.
- 3.1.4 Similarly, the suggestion that Guildford cannot meet any of Woking's unmet housing need until beyond Woking's plan period given the time it will take to commence delivery on the main strategic sites ignores the council's ability to address its housing requirement earlier in the plan period if it chose to do so – see response to que 4.

² The alternative 100% of the remaining unmet need would provide for 1,575 dwellings 82dpa.

The simple fact is GBC have for year used their GB status as a reason why they have been unable to meet their housing targets³, and are now using this as a means to suppress the housing target going forward. Whilst the need to protected the GB is recognised, that need has to be weighed in the balance against the acute housing needs of the area, and GBC’s responsibility to help address that need. We believe the approach adopted in Waverley was correct and should be adopted in Guilford; with as we suggest at least 60% of the residual requirement being met in Guildford in recognition of the extent of the GB within the borough as opposed to Woking and Waverley. In this regard we note that whilst Waverley and Woking are less constrained than Guildford, Woking encompasses a much smaller geographical area and as such its capacity to meet its unmet needs is severely restricted.

Authority	Proportion of Local Authority land area covered by Green Belt, National Parks, Areas of Outstanding Natural Beauty or Sites of Special Scientific Interest	Geographical Area
Guildford	89%	270km ²
Woking	63%	63.6km ²
Waverly	64%	354km ²

- 3.1.6 Finally we note that in their response to the Inspector’s initial questions GBC suggest that the scale of the unmet housing need in Woking has changed/ reduced since the Woking Core Strategy was adopted in Oct 2012. In doing so they rely on the new standard methodology recently consulted upon by the government which suggests Woking’s OAN is circa 409dpa rather than 517dpa. The same methodology suggests that Guildford’s OAN is circa 798dpa⁴. GBC cannot look to rely on the government’s proposed standard methodology when arguing against meeting any of Woking’s Unmet Need and at the same time ignore this when it comes to their own housing need. A consistent approach needs to be adopted one way or the other.

Migration from London

- 3.2.1 As set out in our reps of July 2017, the failure of the GBLP to look to address the needs of London is foolhardy and prejudicial to the credibility of overall housing strategy.
- 3.2.2 Paragraph 2.55 of the West Surrey SHMA (September 2015) suggests that there is an unusually close interconnectivity between the authorities in this HMA and London, and paragraph 4.68 recognises an important interaction in the demographic projections. Whilst the 2017 SHMA update suggests at para 3.45 that *‘the relative stability in recent flows is notable and does not point to a basis for adjustments to the*

³ In reality the situation was due to the policy vacuum GBC found themselves in. The Guildford Borough Local Plan (adopted in 2003) only provided for the housing needs of the area until 31 March 2006. Previous attempts at plan making have failed and housing delivery has stalled given the boroughs GB status.

⁴ Some 135dpa more than the GBLP is planning for.

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SNPP we nonetheless believe that some allowance for migration from London should be taken into account in formulating the OAHN⁵.

⁵ To this end we would, like the Forum, support something akin to the 12dpa provided for in Waverley

4. Housing Trajectory

Is the plan's housing trajectory, which starts at a low level and rises towards the later years of the Plan period, a sound basis for meeting housing need? Relevant topics include:

- 4.1 The ability or otherwise of increasing the rate of delivery in the early years.
- 4.2 Whether the housing trajectory is realistic and deliverable, and whether there are any identifiable threats to delivery.
- 4.3 The key infrastructure improvements influencing the housing trajectory.

4.1.1 Policy S2 suggests a stepped trajectory as follows:

Year	Annual Requirement in June 2016 Plan	Annual Requirement in June 2017 Plan
2018/19	500	-
2019/20	550	450
2020/21	600	450
2021/22	600	500
2022/23	700	500
2023/24	700	500
2024/25	700	550
2025/26	700	600
2026/27	700	700
2027/28	700	700
2028/29	785	700
2029/30	790	800
2030/31	790	810
2031/32	790	850
2032/33	790	850
2033/34	-	850

4.1.2 As is clear from the above the plan as it has progressed has not only reduced the plan requirement from 13,860 – 12,654, but increased the extent to which the plan requirement is back-loaded.

4.1.3 In this regard we note that whilst paragraph 4.1.9a of the Pre Submission LP suggests that the stepped trajectory set out in the Annual Housing Target table adds up to a sum total of 12,426 homes, this is factually incorrect as it only equates to 9,810 homes.⁶

4.1.4 We also note given the figures set out in the Annual Housing Target table that of the 12,426 dwellings proposed across the plan period, circa 50% are to be delivered in the last 7 years of the plan period (2027/28 (+)). In addition it is clear from the housing trajectory on p22 of the Oct 2017 LAA⁷ that the stepped trajectory will result in housing delivery running below the housing requirement year on year until 2024/25 – some 10 years into the plan period – which does not suggest a plan that is **positively prepared, effective, or consistent with national policy.**

⁶ Only when one includes 654dpa in years 2015/16 – 2018/19 the overall figure is 12,426 dwellings.

⁷ See also p58 of the HTP (Dec 2017)

4.1.5 Given the clear and significant housing need in the borough a stepped trajectory seems irrational and contrary to the spatial vision of the LP. To this end we note there is considerable disparity between the June 2016 LAA and the Oct 2017 LAA in terms of the number of homes to be delivered in each location over the 3 delivery periods, as set out below, the figures for the 2017 LAA being highlighted in orange.

Location	Number of homes (net) per delivery period			Total
	1-5 years	6-10 years	11-15 years	
Town Centre	242	655	275	1,172
	90	856	275	1,221
Guildford urban area	441	526	603	1,570
	185	611	603	1,399
Ash and Tongham (urban area)	22	35	19	76
	0	35	19	54
Ash and Tongham (countryside, including Ash Green)	532	427	411	1,370
	212	457	456	1,125
Within villages	119	11	65	195
	78	11	65	154
Villages (land proposed to be inset from the Green Belt)	176	40	20	236
	227	25	20	272
PDL in the Green Belt	71	188	40	299
	117	278	0	395
Proposed new settlement	200	950	950	2,100
	150	850	1,000	2,000
Proposed extensions to urban areas	540	1,700	1,700	3,940
	450	1,000	1,900	3,350
Proposed extensions to Villages (excluding Ash Green)	1085	650	300	2,035
	795	0	0	795

Rural exception	30	30	30	90
	30	30	30	90
Windfall	125	250	250	625
	150	300	300	750
Total	3,583	5,462	4,663	13,708
	2,484	4,453	4,668	11,605
Difference June 2016 to Oct 2017	-1,099	-1,009	+5	-2103

- 4.1.6 Whilst the greatest disparity is that associated with ‘the proposed extensions to Villages (excluding Ash Green)’, it is clear from the table above that the scale of development proposed around Ash and Tongham has been reduced as well as that Within villages / Villages (land proposed to be inset from the Green Belt).
- 4.1.7 The June 2016 LAA was released alongside the 2016 version of the Reg 19 plan which sought to deliver 13,860 dwellings over the period 2013 – 2033 (693dpa). The Oct 2017 LAA supports the revised plan of June 2017 which, as per the submission plan looks to deliver just 12,426 dwellings for the period 2015-34 (654dpa). Some 1,434 dwellings less than previously proposed. The simple fact is that the June 2016 plan and its associated SA sought to demonstrate that GBC could deliver 13,860. The areas ability to accommodate this level of growth has not changed; all that has changed is GBC’s interpretation of the uplift required to address economic growth and housing need, and affordability and market signals, which we suggest points to a need to deliver 14,174 dwellings across the plan period (2015-2034) (746dpa), added to which GBC should be looking to provide at least 50dpa to address the unmet needs of Woking/ migration from London.
- 4.1.8 To this end we note that the 2017 LAA demonstrates that GBC could, from 2019/20, deliver 773dpa on average over the remaining plan period, whilst para 1.43 of GBC response to initial questions suggests the plan can deliver 877dpa from 2020⁸. Thus a stepped trajectory is not required – what GBC need to do is investigate how they can increase the rate of delivery in the early years by working with developers and statutory providers to address any identifiable threats to delivery; albeit we do not see any showstoppers in this regard.
- 4.1.9 In the context of the above, whilst we appreciate the fact that a number of the larger strategic sites such as Wisley, Gosden Hill and Blackwell Farm will by their very nature, have long lead in times, some sites such as those associated with the Ash and Tongham extension (currently countryside) could deliver more quickly than suggested. Indeed as both A2 and Bewley are on site at present it would appear that

⁸ Para 3.5 of GBC response to initial questions also highlights the fact that ‘annual delivery following adoption exceeds the OAN of 654 homes per annum in each year except for Year 1. It is projected to be 769 homes in Year 2 rising to over 900 homes per year from 2027 onwards.’

GBC's suggestion of first completions in 2021/2022 is somewhat pessimistic – this should be 2019/120 at the latest.⁹ Likewise it is not clear why delivery on some of the Town Centre and Guildford urban area sites (excluding SARP) could not start delivering earlier than suggested.

- 4.1.10 Given our position on the OAHN, we believe that there is both a need to provide for more housing, and that given the comments on pages 44 and 46 of the 2016 SA, and at paras 6.3.10, 10.5.1 and 10.9.12 of the 2016 SA, there is capacity within the borough to accommodate more, and during the earlier part of the plan period. Furthermore we note that Enterprise M3 have made it clear that Guildford is the main town and economic powerhouse for the Borough and plays a key part in the wider Enterprise M3 area; and that it needs to be able to accommodate new development to ensure the future vitality and prosperity of the town and its surroundings.¹⁰

They have also stated: -

*'Elmbridge, Guildford and Runnymede remain the **least affordable** locations in the Enterprise M3 area... The cost of renting a home is also relatively high in the Guildford area (some 20% higher than the average for Enterprise M3 area overall). We therefore welcome Local Plan policies that encourage development of more homes...'*¹¹

*'On balance, Enterprise M3 LEP is supportive of Guildford's Proposed Submission Local Plan and welcomes the strategy put forward to allow Guildford to continue to play a **pivotal role** in the economic prosperity of the M3 Corridor as one of the LEPs key Growth Towns.'*¹²

- 4.1.11 In addition to the above, given GBC's past poor performance (see response to question 5 below), we believe that back loading the future supply is inappropriate and contrary to government guidance. The housing needs of the area need to be addressed now – not put off for another day.
- 4.1.12 The 2017 SA in assessing the reasonable spatial strategy alternatives¹³ adopts Option 1 (the reasonable low growth option) as the preferred approach. This takes the OAN of 12,426 and provides for a 9.4% buffer so that it considers the impact of delivering 13,600 dwellings across the plan period¹⁴.
- 4.1.13 The 2016 SA adopted option 4 as the preferred approach – which at that time was an OAN of 13,860 and a 14% buffer, which delivered some 15,844 dwellings over the plan period. It advised on p44 that this was the preferred approach *'after having determined how best to 'trade-off' between competing objectives, and in-light of wide ranging perspectives.'*

⁹ NB Bewley control the SANG at Ash and have been doing everything they can to facilitate its release to the Land Trust the delay in its release is purely down to GBC and their delays in approving a DOV to enable this to take place. In addition Gleeson have permission for 254 dwellings within area A29 that has its own dedicated SANG. SANG is not a show stopper in Ash.

¹⁰ P15 of the 2016 SA and p13 of the 2017 SA

¹¹ P19 of the 2016 SA and p16 of the 2017 SA

¹² P22 of the 2017 SA

¹³ P36 table 6.3 and p46-47 and table 7.1

¹⁴ NB the trajectory in the LAA and HTP suggests 14,191 dwellings can be delivered – a buffer of 14%

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4.1.14 As the constraints in Guildford have not altered in the period between the publication of the 2016 and 2017 SA, it would appear that the 2017 SA has been 'retrofitted' to accommodate the changing aspirations of GBC rather than as a reaction to a change in constraints. Thus technically the borough could in our opinion still accommodate circa 15,844 dwellings in a sustainable manner.

5. Five Year Housing Land Supply

5.1 Is the methodological basis for calculating the 5 year housing land supply sound? (The Council's calculations are based on a 20% buffer, the Liverpool methodology and a rising trajectory – see 3.50 of the Council's response to initial questions.)

5.2 How many years' supply of deliverable housing land exist at present, having regard to the housing trajectory, the current supply position, and the plan's housing allocations?

5.3 Is the plan resilient and flexible enough to maintain 5 or more years' supply of deliverable housing land going forward? (See Appendix 7 of the Housing Delivery topic paper).

GBC's position on the 5 year HLS

Before commenting upon this matter it should be noted that GBC own position on the 5 year HLS is unclear – see

- Housing Topic Paper (as at 2018) – between 3.72 – 4.65 years
- Housing Trajectory (as at 2018) – 5.05 years
- LAA Addendum June 2017 (as at 2017) – 2.36 years

The start date for the consideration of a 5 year supply

5.1.1 Whilst the most recent monitoring year for which there is up to date completions data should be the base date for the calculation of 5YHLS, in this instance 2017/18, this monitoring year has now ended and we are in the monitoring year 2018/19. As the plan is also likely to be adopted in 2019 the assessment of the 5YHLS position should commence in 2018/19, provided it is based on accurately recorded completions data and not forecast completions.

Previous Under Provision, Liverpool/ Sedgefield and the 20% buffer

5.1.2 In considering the issue of the 5 year HLS one has to have regard to the previous levels of under provision. The table below identifies actual net completions against the annual requirement for the past 10 years. It is clear from this that GBC have failed to deliver in all but 1 year, and that the cumulative shortfall since 2006 equates to circa 4½ years of the current annualized requirement/ 1½ years if one looks at the period since 2015/16.

Year	Annual Req.	Actual Net Compl's ¹⁵	Difference	Cumulative position over whole period	Cumulative position over proposed plan period
06/07	422	357	- 65		
07/08	422	478	+56	-9	
08/09	422	130	-292	-301	
09/10	422	227	-195	-496	
10/11	422	190	-232	-728	
11/12	422	262	-160	-888	
12/13	422	234	-188	-1076	
13/14	693 ¹⁶	137	-556	-1632	
14/15	693	242	-451	-2083	
15/16	654 ¹⁷	387	-267	-2350	-273
16/17	654	294	-360	-2710	-630
17/18	654	306 ¹⁸	-348	-3058	-978

5.1.3 Given the above there can be no justification for anything other than a 20% buffer when calculating the 5 year HLS. Likewise we do not believe there to be any justification for adopting the Liverpool method. Paragraph 035 Reference ID: 3-035-20140306 of the NPPG is clear in its advise that LPA's should '*deal with undersupply within the first five years of the plan period where possible*' Adopting both a stepped trajectory and the Liverpool approach would put off the delivery of much needed housing to later on in the plan period and is totally unjustified.

5.1.4 In the context of the above we note that the Guildford Housing Forum have, using GBC's HLS figures, established post adoption that:

- Adopting a stepped trajectory with Liverpool and 20% provides for a modest, 5.09 years supply for the period 2018/19 to 2022/23;
- Adopting a stepped trajectory with Sedgefield and 20% means that GBC only have 3.77 years supply for the period 2018/19 to 2022/23, and that they never achieve a 5 year supply;
- Adopting a uniform OAN of 654 with Sedgefield and 20% means that GBC only have 3.99 years supply for the period 2018/19 to 2022/23, and that they only achieve a 5 year supply in 2024/25 (some 9 years into the plan period);
- Adopting a uniform OAN of 654 with Liverpool and 20% means that GBC only have 3.13 years supply for the period 2018/19 to 2022/23, and that they never achieve a 5 year supply;

5.1.5 Whilst adopting a stepped trajectory with Liverpool and 20% may appear to be the only way in which GBC can achieve a 5 year HLS (using their own figures), this does not make it correct to adopt this approach; rather it suggests that the plan is unsound and further sites need to be allocated to meet the shortfall. In addition it calls into question whether this matter was discussed during the DTC discussions with neighbouring authorities. From what we can tell it was not.

¹⁵ From Dec 2017 HTP

¹⁶ 2015 SHMA

¹⁷ 2017 SHMA

¹⁸ Uncorroborated

- 5.1.6 The promotion of a stepped trajectory is inconsistent with the aims and objectives of the NPPF – to boost significantly the supply of housing, and the very clear advice in PPG on the need to adopt the Sedgefield method to the 5 year housing land supply assessment unless there is a robust justification for not doing so. GBC have not provided a robust reason for failing to adopt an annual average housing requirement or for spreading the delivery of housing over the plan period. The fact GBC have accepted they need to adopt a 20% buffer¹⁹ in calculating their 5 year housing land supply given persistent under-provision would support our view that they should use the ‘Sedgefield method’ to make up the shortfall as soon as is reasonably possible. Poor completion rates over the last 10 years should not be put forward as a credible reason for under-provision going forward.
- 5.1.7 Given Paragraphs 022 Reference ID: 3-022-20140306 and 026 Reference ID: 3-026-20140306 of the PPG we would suggest that GBC need to undertake a further review of the LAA/ a further call for sites to identify sites that can be delivered earlier in the plan period. Whilst this may well mean reviewing the site constraints and looking at ways said constraints could be addressed/ looking to allocate a number of smaller sites that are able to deliver more quickly, this is a prerequisite of national guidance, and GBC cannot adopt an **unjustified and negative approach to plan making**. In this respect we note that The Housing White Paper (HWP) recognised the importance of smaller sites to maintaining consistent supply and we would support the Government’s proposal in the HWP in this regard.
- 5.1.8 As drafted we do not believe the PSLP has followed the advice in the NPPF, and that the LAA makes generalised and in some cases questionable assumptions about the connection between levels of housing provision, benefits and impacts. Furthermore it fails to consider the extent to which the issues identified might be resolved or mitigated through for example highways and footway improvements, sewerage infrastructure improvements, selective development of parts of sites, the incorporation of green buffers/ SANGS and other measures.

The Components of the HLS

- 5.1.9 In addition to the above there is the issue of the components of the supply, whether they are all deliverable as suggested, whether there is any double counting etc. Para 47 (bullet point 2), is clear on the need for LPA’s to *‘identify and update annually a supply of specific deliverable sites sufficient to provide five years’ worth of housing against their housing requirements’*. Deliverable is defined as *‘sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable.’*
- 5.1.10 Having regard to the above we note that there is no 5 year HLS calculation in the GBLP²⁰. Rather the housing trajectory includes the following in the 5 year period 2018/9 to 2022/23.²¹

¹⁹ See Para 3.12 of GBC response to initial questions

²⁰ The last calculation was in the June 2017 LAA which is now out of date as it related to the 2017/18-2022/23 period

Location	1-5 years
Outstanding capacity (commenced)	148
Outstanding capacity (approved)	1385
Windfalls	120
Rural exception	24
Town Centre	72
Guildford urban area (excluding SARP)	148
SARP	0
Ash and Tongham (urban area)	0
Ash and Tongham extension (currently countryside)	137
Within villages	63
Villages (land proposed to be inset from the Green Belt)	182
PDL in the Green Belt	94
Proposed new settlement – wisely	50
Proposed Extension to Urban Area (Gosden Hill, Guildford)	50
Proposed Extension to Urban Area (Blackwell Farm, Guildford)	50
Land north of Keens Lane, Guildford	113
Land to the north of West Horsley	90
Land to the west of West Horsley	102
Land near Horsley Railway Station	75
Land at Garlick's Arch, Send Marsh/Burnt Common and Ripley	250
Land west of Winds Ridge and Send Hill, Send	40
Total	3,193 ²²

5.1.11 In reviewing the proposed allocations – as set out on pages 142 – 145 of the PSLP, the realistic candidates for development in the Oct 2017 LAA and the sites with PP in appendix C of the 2017 LAA we note that the position in terms of the trajectory over the plan period is somewhat confusing i.e.

	Proposed allocations as set out in the PSLP	Realistic candidates for development in the 2017 LAA
Town Centre	1285 Of those allocated site A11 (160 dwellings) has PP)	1221 – this matches the trajectory Sites ID2216, 817, 2370, 88, 93, 236 and 1309 are not identified in the PSLP Only those highlighted are over 10 dwellings Are those that are less than 10 units really windfalls?

²¹ Source – LAA (Oct 2017) – p19

²² We understand the Forum through their own assessment of the HLS position believe the 5 year HLS for the period 2018/9-2023/4 to be 3,148, a difference of 45 dwellings

5.1.12 From this it would appear that there is a discrepancy between the TC sites identified in the LP and those identified in the LAA / housing trajectory whether this is in part due to some of those in the LAA also having planning consent is not clear, albeit if one looks for site 88 (15 units) (Guildford Adult Education Centre), as listed in Appendix B of the LAA, said site is not listed in the sites with PP, which leads one to wonder if there has been some double counting of smaller TC sites/ whether the smaller sites are also included in the windfall element. GBC need to clarify their position in this regard.

	Proposed allocations as set out in the PSLP	Realistic candidates for development in the 2017 LAA
Guildford urban area	<p>5104</p> <p>This includes 150 Land north of Keens Lane, Guildford – A22 1,000 - Slyfield Area Regeneration Plan – A24 1,700- Gosden Hill – A25 1,500- Blackwell Farm, Guildford – A26 All of which are listed as urban extensions in the LAA/ trajectory</p> <p>And 56 dwellings at Wey Corner (A14) which already benefits from PP</p> <p>This leaves 698 dwellings of which 450 are on land between Gill Ave and Rosalind Franklin Close – which appears in the LAA as a Realistic Candidate for 61 dwellings.</p>	<p>1606</p> <p>Which includes the 1,000 - Slyfield Area Regeneration Plan</p> <p>242 correlate to sites allocated in the LP leaving the anomaly of land between Gill Ave and Rosalind Franklin Close, and 200 at Guildford College which the LP has struck through as this is student accommodation not C3 accommodation, and a list of smaller sites that are by and large less than 10 units and could be included in the windfall element</p> <p>NB The trajectory suggests 1399 from this source (including 1,000 on SARP)</p>

	Proposed allocations as set out in the PSLP	Realistic candidates for development in the 2017 LAA
Ash and Tongham	<p>1870</p> <p>This includes both the urban area and that which is currently countryside</p> <p>Of those allocated site A27 (58 dwellings) has PP) and a large part of A29 benefits from PP – see below</p>	<p>1185</p> <p>NB land south of Ash and East of Tongham is only identified as accommodating 1063 dwellings in the LAA</p> <p>NB The trajectory suggests 1179 from these sources</p>

- 5.1.13 It should be noted that within the area identified as A29, planning permission exists for 986 dwellings (net), and is pending for a further 243, such that of the allocation for 1,750 dwellings over 55% is already consented, and with pending applications, over 70% could be consented before the plan is adopted. Please see plan at **Appendix 1**.
- 5.1.14 Given the above we do not understand why the proposed allocations at Ash and Tongham are shown in the trajectory as delivering from 2021/22, and why some 1,125 are still shown as commitments under the allocations rather than circa 800, with the residual included within the outstanding capacity/ approved cohort, which is where they are when one looks at appendix B of the LAA – which begs the question has there been double counting here.
- 5.1.15 The Windfalls cohort, and how this relates to the town centre sites, Guildford urban area, Ash and Tongham urban area, and sites within villages (not in the GB) is also unclear. Para 48 of the NPPF is clear that LPA's may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Together the sites listed in the windfalls cohort and the other cohorts listed above amount to 403 dwellings in the 5 years HLS and over 3,600 dwellings across the 15 year period from 2019/20. Whilst some are allocated, and thus not windfalls, others are not and by definition given their location and the fact they are not mentioned in the LAA should be windfalls, which again begs the question – is there double counting/ how can this scale of windfall development be justified? It is, as the Forum point out circa 20% of the overall supply.
- 5.1.16 In addition we would question whether certain allocations – such as the North Street site (A6) will actually go on to deliver given its planning history. We would suggest this site is treated with caution/ as part of the buffer rather than the defined supply.
- 5.1.17 Overall, whilst not undertaking an exhaustive assessment of all sites within the various cohorts that make up the HLS it appears to us that the way in which the HLS has been modelled leaves itself open to double counting and that there can be no certainty that what has been predicted to be delivered will in fact be delivered.
- 5.1.18 In the context of the above we note the HLS calculations undertaken on behalf of the Forum which suggest:
- Adopting a stepped trajectory with Liverpool and 20% GBC would only have a 5.00 years supply for the period 2018/18 – 2022/23, and that the HLS falls below 5 years again from 2026/27;
 - Adopting a stepped trajectory with Sedgefield and 20% means that GBC never achieve a 5 year supply. The nearest they get is 4.97 years in 2024/25;
 - Adopting a uniform OAN of 654 with Liverpool and 20% means that GBC only have 3.76 years supply for the period 2018/19 to 2022/23, and that they only achieve a 5 year supply in 2024/25 (some 10 years into the plan period), and that the HLS falls below 5 years again from 2029/30;
 - Adopting a uniform OAN of 654 with Sedgefield and 20% means that GBC never achieve a 5 year supply. The nearest they get is 4.56 years in 2029/30.

- 5.1.19 A comparison of the GBC and Forum's position on the 5 year HLS is set out in **Appendix 3**. This makes for sober reading and reiterates the need for GBC to allocate more sites to ensure the housing needs of the area are met in a timely fashion.
- 5.1.20 In the context of the above it is noteworthy that when one compares actual completions to predictions in previous AMRs, the predictions by and large are overly optimistic²³. We would therefore suggest that the deliver rates predicted within the housing trajectory should be treated with a degree of scepticism, especially the further into the plan period one goes.
- 5.1.21 Given the above we would suggest that it is highly unlikely that GBC will deliver the number of dwellings suggested in the first 5 years of the plan and that a contingency of at least 10% should be factored in to account for double counting, delays/ lapse rates, and that sites to accommodate a shortfall need to be identified. The scale of the shortfall being dependent upon whether one accepts the Sedgefield or Liverpool method and ones position on the housing requirement.
- 5.1.22 Whilst we have already commented upon the deliverability point and footnote 11 of the NPPF above, we would comment here upon the delivery rates expected in the housing trajectory. The Lichfields report - Start to Finish - How Quickly do Large-Scale Housing Sites Deliver (November 2016) indicates that whilst larger sites deliver more homes each year, even the biggest schemes (those with capacity for 2,000 dwellings) will, on average, deliver fewer than 200 dpa, albeit their average rate – 161 dwellings per annum – is six times that of sites of less than 100 dwellings (27 dwellings per annum). It also indicates that *'annual average delivery on sites of up to 1,499 dwellings barely exceeds 100 dwellings per annum, and there were no examples in this category that reached a rate of 200 per annum'*.
- 5.1.23 The Lichfields report also indicates that:
*'on average, a site of 2,000 or more dwellings does not deliver four times more dwellings than a site delivering between 100 and 499 homes, despite being at least four times the size.
In fact it only delivers an average of 2.5 times more houses. This is likely to reflect that:*
- it will not always be possible to increase the number of outlets in direct proportion to the size of site – for example due to physical obstacles (such as site access arrangements) to doing so; and*

²³ See **Appendix 2** attached to these reps. This demonstrates that GBC have not produced any housing trajectories for a number of years – the 2010/11 AMR having advised on p13 that: *'Previously, we have used a housing trajectory to project housing completions in future years. However, as reported last year, until completion a SHLAA or a housing number (apart from for the Western Corridor Blackwater Valley subregion, as set out in the South East Plan, 2009), it is impossible to prepare a reliable housing trajectory.'*

Not only does this raise the question as to whether GBC have met with their statutory duty to produce an annual assessment of supply, but how they have sought to plan, monitor and manage in the light of the above.

• *overall market absorption rates means the number of outlets is unlikely to be a fixed multiplier in terms of number of homes delivered.*

5.1.24 Having regard to the above, the delivery rates suggested for the likes of Wisley and Gosden Hill, Guildford would appear overly optimistic, even when one factors in operating multiple outlets.

5.1.25 The fact that sites of 500+ dwellings make up 40% of the total housing trajectory²⁴ is such that any delay in the projected delivery of these sites, would significantly impact on the ability of GBC to meet its housing target / the housing trajectory.

5.1.26 In addition to the above one should in our opinion bear in mind the changing definition as to what is deliverable, as set out in the consultation draft NPPF (March 2018) which states:

*'Deliverable: To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. Small sites, and sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (e.g. they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans). **Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.**' My emphasis.* This would clearly call into question some of the sites currently included by GBC in their housing trajectory

The Proposed Buffer

5.1.27 Whilst the inclusion of a buffer is welcomed, we would question whether this is in fact going to be sufficient given the fact we believe the trajectory to be unduly optimistic. There is a significant body of evidence that planning permissions do not consistently translate into completions on site. Indeed, this is the basis on which the Letwin Review is founded to look to explain the gap between the numbers of planning permissions granted against those built in areas of high demand, with absorption rates a key area identified for further investigation within his interim findings. This should be factored into any trajectory to ensure it can adhere to the requirements of the Framework (para 14) and have sufficient flexibility to adapt to rapid change.

5.1.28 If the Council has local evidence on the conversion rate of permissions to completions in Guildford this would be a useful indicator against which to assess the robustness of the trajectory. Nationally, Lichfields research entitled 'Stock and Flow Planning Permissions and Housing Output' indicates that permission was granted for 261,644 new homes in 2015 in England, whilst net completions in 2015–16

²⁴ Allocations A24, A25, A26, A29 and A35 equate to 7,950 dwellings i.e. over 50% of the overall housing provision of 14,191 as predicted in the housing trajectory and over 60% of the housing requirement

amounted to 189,650 (of which 163,940 were new build). Similarly in a presentation given by a DCLG Planning Director (Ruth Stanier) to the HBF Planning Conference in September 2015, DCLG presented research findings that suggest that 10-20% of permissions do not materialise into a start on site for a number of reasons. In addition it is estimated that c.15-20% of permissions are re-engineered with a re-permission sought, which would have the effect of delaying completions, potentially for a significant period. Clearly, the application of a significant buffer in the trajectory to compensate for this known issue would be commensurate with these DCLG findings.

5.1.29 The Council's contingency of 1,765²⁵ dwellings (14%) is as we say welcomed albeit in these circumstances we would question whether it will provide sufficient flexibility for unforeseen circumstances.

5.1.30 Given the above we would reiterate our view that further sites need to be identified now if both the 5 year HLS and the overall housing target are to be met.

²⁵ 14,191 as set out in the Oct 2017 LAA trajectory – 12,426 = 1,756

9. Spatial Strategy, Green Belt and Countryside Protection

This is a section on the soundness of the spatial strategy and the overall approach to Green Belt and the countryside. Site-specific matters, including local Green Belt and landscape issues, will be dealt with separately in relation to the individual sites.

9.1 Is the spatial strategy as set out in the preamble to Policy S2 sufficient to explain the plan's approach to the overall distribution of development and guide future development during the plan period?

9.1.1 The spatial strategy and spatial vision appear to be at odds with one another. Whilst the spatial vision advises in paragraph 2 that the council is seeking to meet the communities needs in relation to housing, paragraph 3 indicates that the Council has taken the conscious decision to reduce its overall housing requirement, extend the plan period by a further year and introduce a stepped trajectory, which merely serves to compound the implications of the reduced housing requirement. This internal conflict, supported by the changes to policy 2, demonstrates a plan that is not positively prepared. Indeed as drafted the plan will exacerbate the affordability issues identified in the SHMA and prejudice those on low incomes wishing to enter the housing market such that it does not reflect the aims and objectives of national policy and is thus unsound

9.2 Having regard to the need for housing, does the plan direct it strategically to the right places? Relevant aspects are:

- The spatial distribution of existing and future need for housing
- Movement patterns
- Green Belt and landscape impact
- Infrastructure provision and constraints.

No comment

9.3 Are the proposed new business land and floorspace allocations in the right strategic locations? Relevant aspects are:

- The spatial location of existing and future needs
- Movement patterns
- Green Belt and landscape impact
- Infrastructure provision and constraints.

No comment

9.4 Having regard to the extent to which it is proposed to release Green Belt land and develop greenfield sites, do the plan's policies strike the right balance (in terms of housing provision) between the use of urban and previously developed land and urban extensions? Has the potential for further residential development in the urban area been adequately explored? (See also Item 5 of my initial questions.)

No comment

9.5 Having regard to 9.2 to 9.4 above, are the overall amount of land proposed to be released from the Green Belt, and the strategic locations for Green Belt release, justified by exceptional circumstances?

No comment

9.6 Does the plan take a sound approach towards the inseting of various villages from the Green Belt?

No comment

9.7 Taking into account the extent of housing, employment and other needs, does the plan take a sound approach towards the protection of the landscape, including the AONB and AGLV, and the countryside generally?

No comment

9.8 If the Plan had to accommodate a greater housing requirement, for example through a higher OAN, what would be the implications in terms of the spatial strategy?

9.8.1 Put simply the strategy would remain the same – GBC would just need to identify more sites using the same strategy – starting with the urban areas, then countryside beyond the GB and then GB, including GB extensions and PDL in the GB. What we would caution against is looking to redevelop existing strategically important/ locally significant employment sites, as this will merely push employment provision out to less sustainable, potentially GB locations, and prejudice Guildford's position as an economic hub within the Enterprise M3 LEP.

9.9 What are the reasons that have led the Council to propose including new land in the Green Belt around Ash and Tongham, and can the circumstances be regarded as exceptional? What are the implications for the future housing needs of this Urban Area?

9.9.1 Put simply we do not believe there to be any sound justification for the council's decision to add additional land into the GB around Ash and Tongham. The rational put forward in GBC's response to the initial questions²⁶ and in the Dec 2017 GB Topic Paper are not such as to warrant such a designation and in proposing such a designation GBC are affectively prejudicing their ability to provide for more sites in this area – should the need arise. The rational put forward by GBC could just as easily be achieved by the application of normal settlement boundary and countryside protection policies and is not a compelling one / justified by exceptional circumstances. This action also contradicts GBC's strategy to '*maximise sustainable development on CBGB before exploring the extent to which Green Belt land should be used to meet needs*' as set out at para 3.17 of their response to initial questions.

²⁶ Paras 8.41 – 8.44.

11. Site Allocations

A29, Land South and East of Ash and Tongham

11.20 How would road traffic be handled from these sites, especially having regard to the railway line and the narrow lanes and streets?

11.20.1 Please see attached report from iTransport (**Appendix 4**). This makes it clear that:

- a) The traffic impact work undertaken for the recent land south of Ash Lodge Drive planning application has been agreed with SCC. This assessment allows for the cumulative impact of 1,701 dwellings within the allocation, and 1,912 dwellings overall in the local area. SCC is satisfied with the cumulative traffic impacts of that level of development and is not requesting financial contributions towards a new rail bridge, and/or measures to deal with the alleged 'narrow lanes' in the area.
- b) Notwithstanding these two matters, local concern regarding the operation of the Ash level crossing is acknowledged – it is perhaps desirable for it to be replaced by a bridge and the current shortfall in funding could be made up by contributions from development in the local area. In that case:
 - Replacing the level crossing with a bridge should unlock a constraint to the operation of the local highway network, and additional development above the 1,750 dwellings currently proposed by the policy will be appropriate; and
 - Increasing the number of dwellings allocated in the area will reduce the financial burden per dwelling, thereby enabling a greater level of funding for other transport schemes, e.g. junction improvements and measures to encourage the use of sustainable modes.

11.20.2 Having regard to the attached road traffic is not a constraint to delivery of housing in this allocation either in terms of impact on the railway line or the 'narrow lanes and streets' in the area.

11.21 Are the site allocations too large or is there scope for a greater number of new homes in this location, being land beyond the Green Belt?

11.21.1 Whilst the area identified as A29 is a large area, as is clear from the attached plan, this area comprises a number of distinct sites, many of which benefit from planning permission. It should also be noted that whilst the largest of these sites – the land south of Ash Lodge Drive benefits from planning permission for 400²⁷ dwellings, and has commenced development, it is also subject of an application²⁸ to increase the number of units to 485²⁹, by changing the unit mix, reducing the number of 4 bed units and increasing the number of 2 bed units. At 400 dwellings the site generated a gross site density of 18dph, at 485 dwellings it is 22dph (gross)³⁰ In traffic terms this generates 38 extra 2 way traffic movement in the am peak and 33

²⁷ 398 net

²⁸ 17/P/02592

²⁹ 483 net

³⁰ The gross site area is 22.1ha.

The Net is 13 hectares. The net density at 400 units was 30dph, at 485 it is 37dph.

extra 2 way traffic movement in the pm peak. In terms of impact on education the pupil yield from the housing mix in the 400 unit scheme was (using current multiplies) as set out below:

The Development	1-Bed	2-Bed	3-Bed	4-Bed	5-Bed	Total
Mix	30	107	156	106	1	400
Primary Multipliers	0.05	0.09	0.3	0.43	0.43	
Primary Pupils	1.5	9.63	46.8	45.48	0.43	103.84
Secondary Multipliers	0.01	0.07	0.19	0.36	0.36	
Secondary Pupils	0.30	7.49	29.64	38.16	0.36	75.95

The pupil yield from the housing mix in the current 485 planning application is as below:

The Development	1-Bed	2-Bed	3-Bed	4-Bed	Total
Mix	34	205	197	49	485
Primary Multipliers	0.05	0.09	0.3	0.43	
Primary Pupils	1.7	18.45	59.1	21.07	100.32
Secondary Multipliers	0.01	0.07	0.19	0.36	
Secondary Pupils	0.33	14.35	37.43	17.64	69.75

As is clear from the above despite the increase in housing numbers, the change in the mix is not actually impacting upon the pupil yield as smaller houses have less impact.

11.21.2 The above demonstrates that increasing the density of development within some of the strategic allocations need not have an adverse impact on local services, or a severe impact on the local highway network, the design approach being such that the development parcels have been maintained as consented and building heights are by and large the same as those consented.

11.21.3 It is also fair to say that higher densities bring with them a proportionate increase in S106 funds that can help unlock infrastructure issues earlier within the plan period, provide more affordable housing, and as they result in a higher number of smaller units, also help address the affordability issues in the local area.

11.21.4 Given the above we would suggest that there is scope for a greater number of new homes in this location, be this through increased densities or a wider allocation of sites.

11.22 Having regard to the different areas and land parcels involved in this allocation, should the plan say more about protecting and enhancing the character of the existing Ash and Tongham urban area and Ash Green villages and creating attractive and cohesive settlement(s)'

11.22.1 As set out above over half this allocation already benefits from consents. The approach adopted by both developers and officers has however been such that the impact of future development on the character of the existing Ash and Tongham urban area has been scrutinised in detail so as to ensure any further development does not detract from the character and appearance of the area.

Enclosures

Appendix 1 – Plan identifying consented schemes in Ash and Tongham

Appendix 2 – Note on AMR

Appendix 3 – Summary position of GBC and GHF on the HLS situation / 5 year HLS post adoption of the GBLP

Appendix 4 - Transport Note prepared by iTransport in response to matter 11.20

Appendix 3 –Summary position of GBC and GHF on the HLS situation / 5 year HLS post adoption of the GBLP

	GBC HLS in 2018/19 to 2022/23	GHF HLS in 2018/19 to 2022/23	GBC first year to achieve 5 yr. HLS if not in 2018/19 – 2022/23	GHF first year to achieve 5 yr. HLS if not in 2018/19 – 2022/23
Stepped trajectory with Liverpool and 20%	5.09	5.00	N/a	N/a – but falls below 5 years from 2026/27
Stepped trajectory with Sedgefield and 20%	3.77	3.71	2021/22	N/a – never achieved- closest is 4.97 yrs. in 2024/25
Uniform OAN of 654 with Liverpool and 20%	3.99	3.76	2021/22	2024/25 NB falls below 5 years again from 2029/30;
Uniform OAN of 654 with Sedgefield and 20%	3.13	3.08	2025/26	N/a – never achieved- closest is 4.56 yrs. in 2029/30