

EXAMINATION OF THE GUILDFORD BOROUGH LOCAL PLAN: STRATEGY AND SITES

EXAMINATION STATEMENT ON BEHALF OF THE GUILDFORD HOUSING FORUM

Matter 3 – Unmet Need in the HMA

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Matter 3 – Unmet Need in the HMA

10 May 2018

1.0 Introduction

- 1.1 This Examination Statement provides a response on behalf of the Guildford Housing Forum ("the Forum"), to those Questions raised by the Inspector (dated 20 April 2018), relating to Unmet Need within the Housing Market Area ("HMA") contained within Guildford Borough Local Plan: Strategy and Sites ("the Plan") and its supporting evidence base.
- 1.2 In addition to the above, this Statement specifically highlights which areas of the Plan are considered to be unsound, and the basis upon which it fails the tests of soundness, and the changes sought.
- 1.3 This Statement has been prepared jointly by Neame Sutton and RPS on behalf of the Forum.

2.0 Matter 3 – Unmet Need in the HMA

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

- (i) The allowance of 83 dpa already contained within the Waverley Local Plan*
- (ii) 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*
- (iii) Any other unmet need issues*

- 2.1 The starting point on this matter is the Forum's firm view that the Plan should meet the full OAN for the HMA as required by Paragraph 47¹ of the Framework. The Plan does not attempt to meet any of the unmet need arising from Woking and as a consequence is **unsound** as currently drafted.

¹ Paragraph 47 of Framework – Bullet point 1 refers

- 2.2 The Council was fully aware of the detailed discussion that took place at the EiP for the Waverley Local Plan Part 1 in summer 2017 and it took an active part in that discussion.
- 2.3 Waverley has accepted its 50% share of Woking's unmet need, which equates to 83 dpa over its plan period. Indeed a Local Plan Part 2 is currently in preparation along with various Neighbourhood Plans to address that need.
- 2.4 The HMA comprises only the three authorities of Woking, Waverley and, Guildford. It is therefore incumbent upon the Council to address the remaining unmet need arising from Woking in full and as part of the preparation of this Plan.
- 2.5 The residual unmet need arising from Woking comprises 1,575 dwellings, which over the current Plan period of 2015 – 2034² generates a requirement of 83 dpa.
- 2.6 The Council seeks in its response to the Inspector's Questions (GBC-LPSS-001 – Question 2) to set out its reasoning for why it cannot meet any of Woking's unmet need. The Council's response is flawed for the following reasons:
- 2.6.1 Reason 1 – The Council has not actually tested a scenario that meets any of Woking's unmet need through its plan making process. It has instead simply disregarded it as an option.
- 2.6.2 Reason 2 – The Council's suggestion that if capacity did exist that should be used to boost its own supply is a contradiction to the case it advances in support of its housing trajectory, which states the trajectory is sound and will achieve the OAN plus a buffer. Therefore if capacity does exist that could, applying the Council's logic, be used to help meet Woking's unmet need.
- 2.6.3 Reason 3 – The Council suggestion that it is unsustainable to release further Green Belt land is inconsistent with the approach it has previously taken in the 2016 Regulation 19 version of the Local Plan, which is summarised in the Forward by the Leader Councillor Paul Spooner that states inter-alia:
- 'The policies and site allocations contained within the Proposed Submission Local Plan are informed by an up-to-date, extensive and robust evidence base.....*
-In total, 1.6% of green belt land will be removed and allocated for development during the plan period.¹³*

² Taken from the Submission version Local Plan – Policy S2

³ Page 5 from 2016 Regulation 19 version of Local Plan – July 2016

- 2.6.4 The 2016 Regulation 19 version of the Plan released land for approximately a further 1,300 dwellings more in the Green Belt than the current Submission version of the Plan. That was considered to comprise a sound approach by the Council.
- 2.6.5 Reason 4 – The Council's view that Woking's unmet need is now lower is predicated on the application of the Government's draft national methodology for calculation OAN. The problem with the Council applying that methodology to Woking is that it has not sought to apply the methodology to its own OAN, which as demonstrated in the Matter 2 Statement⁴ would result in an OAN for Guildford higher than the current Plan figure of 654 dpa⁵.
- 2.6.6 Reason 5 – The Council suggests that Woking will be reviewing its Core Strategy. There is no evidence to support this assertion and currently Woking has no published timetable in place for the review to take place. This is not therefore a viable argument.
- 2.6.7 Reason 6 – Woking's representation to the Plan⁶ confirms that the matter of unmet need in the HMA is unresolved and that Woking will work with Guildford once matters are confirmed after the Examination. The representation goes onto state that:
- 'It is therefore expected that Guildford Borough Council will use the Local Plan process to meet the unmet housing need arising from Woking Borough. The Council is aware of the information that Guildford Borough Council has provided to demonstrate that the unmet need from Woking cannot be met in Guildford. Once this evidence is agreed at the Examination, the Council is willing to cooperate with Guildford and Waverley Borough Councils to find ways of how the unmet need in the Housing Market Area can be addressed. Waverley Borough Council has just been through their Local Plan Examination and the unmet need from Woking was a key topic for discussion.'***
- Underlining is Neame Sutton emphasis.
- 2.6.8 Furthermore, Woking has previously considered this point in the response paper to its Regulation 18 consultation version of its Site Allocations DPD (see copy attached at Appendix 1). This confirms unequivocally that the proposed safeguarded land in the emerging DPD will not be for the present plan period.
- 2.7 The Council has therefore not tested any option that meets the unmet need arising from Woking and its arguments for not being able to do so lack any substance. In fact the evidence indicates that the Council does have capacity to meet Woking's unmet need and that it has not complied with the Duty to Cooperate ("DTC") to address the need within the HMA working with its partner authorities.

⁴ Page 7 of Matter 2 Forum Statement – April 2018

⁵ Government Standardised Methodology for OAN – Guildford OAN – 789 dpa plus unmet need

⁶ Comment No: pslp171/1426 Respondent: 8569857

2.8 The unmet need should therefore be met by this Plan.

2.9 With regard to other unmet need issues it is clear that Guildford shares a close functional relationship with London. It is widely accepted that London has a growing unmet need and that some of that need can be most effectively addressed in those authority areas that share a close functional relationship with the capital. This was a matter explored in the Waverley EIP wherein an allowance of 12 dpa was added to the OAN calculation. Waverley's relationship to London is much more tenuous than Guildford and therefore the Forum is of the view that an allowance for unmet need arising from London should be included in the OAN calculation.

3.0 Changes Sought

3.1 The Forum seeks the following changes to the Plan:

1. The inclusion of the full residual unmet need arising from Woking within the minimum housing requirement figure for the Plan equating to 1,575 dwellings or 83 dpa split across the 19 year plan period; and,
 2. The inclusion of an allowance for unmet need arising from London within the minimum housing requirement figure for the Plan – The Forum suggests a notional allowance of 12 dpa to reflect that agreed in relation to Waverley.
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