

## EXAMINATION OF THE GUILDFORD BOROUGH LOCAL PLAN: STRATEGY AND SITES

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### EXAMINATION STATEMENT ON BEHALF OF THE GUILDFORD HOUSING FORUM

*Resumed Hearings – Matters Raised in Inspector’s Note ID/12*

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21 January 2019

### CONTENTS

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<u>Section:</u>		<u>Page:</u>
<b>1.0</b>	<b>Introduction</b>	<b>3</b>
<b>2.0</b>	<b>Matters Raised in Inspector's Note ID/12</b>	<b>3</b>
	(i) The appropriateness of using 2016-based household projections For the basis of Guildford's Local Plan	3
	(ii) Whether the calculation set out in the Council's paper "Update to OAN Assessment in Guildford as a result of the 2016-based Household Projections" (GBC-LPSS-033b) is an appropriate basis for calculating the OAN	8
	(iii) The implications of the Council's paper "GBC note on OAN following The 2016-based Household Projections" (GBC-LPSS-033a) for	
	• The overall housing requirement set by the Plan	10
	• The housing trajectory	10
	• The 5-year housing land supply	12
	• The need for the additional sites included in the main Modifications	13
	(iv) Whether it is possible at this point in time to come to conclusions on the issue of Woking's OAN and any unmet need	14
	(v) Whether in view of current uncertainties (especially with regard to item 4) it would be appropriate to insert a review mechanism into the Plan and if so, how it would be phrased	15

### Appendices:

<b>Appendix 1</b>	RPS Summary of Scenarios
<b>Appendix 2</b>	Forum Housing Trajectories
<b>Appendix 3</b>	Forum 5-year Housing Land Supply
<b>Appendix 4</b>	Report to Woking Council on its Local Plan Review – October 2018

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*Matters Raised in Inspector's Note ID/12*

*22 January 2019*

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### 1.0 **Introduction**

- 1.1 This Examination Statement provides a response on behalf of the Guildford Housing Forum ("the Forum"), to those additional Questions raised by the Inspector in his note ID/12 (dated 20 December 2018), relating to the implications of the 2016 household projections for OAN and the Plan's housing requirement in the light of the Council's position set out in LPSS-034 and amplified by LPSS-033a, LPSS-033c, LPSS-033c and, LPSS-036.
- 1.2 In addition to the above, this Statement specifically highlights the changes that the Forum considers are necessary to be made to the Plan for it to be found Sound in the light of the current evidence.
- 1.3 This Statement has been prepared jointly by Neame Sutton, RPS and Judith Ashton Associates on behalf of the Forum.

### 2.0 **Matters Raised in Inspector's Note ID/12**

#### ***1. The appropriateness of using 2016-based household projections For the basis of Guildford's Local Plan***

- 2.1 There has already been significant debate during the examination on the correct projections to be used, and it was determined that a baseline of 422dpa, derived from 2014 household projections and 2016 population projections was an appropriate approach to take at the time (Paragraph 3 of ID-005 refers). This being said, the position has now clearly moved on, both in terms of data available and guidance from Government. It is therefore necessary to reappraise the robustness of the position presented by the Council. In terms of the principal shift in evidence, we now have available to us the 2016-based Household Projections, published in September 2018, which is the focus of the above question.
- 2.2 The Forum acknowledges the Inspector's footnote to this question, which clarifies the status of the Government's Consultation and the use of the 2016-based projections is directed at the 'standard method'. However, as identified below, the Forum consider that the relevant considerations in this consultation document are equally applicable to the Examination of the Guildford Local Plan.

- 2.3 The Forum acknowledge that the 2016-based projections are the most up to date in the context of Paragraph 158 of the Framework 2012, however this is not the only relevant consideration, as the Framework requires the Objectively Assessed Need for Housing ("OAN") to also be founded on adequate and up to date evidence. The Forum does not consider that the 2016-based projections represent an adequate or relevant set of data from which to underpin the calculation of OAN.
- 2.4 The Forum expressed concern from the outset of the Local Plan Examination on the use of the 2016-based population projections, which were published on 24 May 2018, around two weeks prior to the start of the Local Plan Examination. Thus during the examination the 2016-based population projections were utilised as part of a modelling process alongside the 2014-based household projections. This was correct at the time, consistent with the Framework 2012 and the supporting 2014 National Planning Practice Guidance ("2014 NPPG").
- 2.5 The Government has since clarified through its consultation document "*Technical Consultation on Updates to National Planning Policy and Guidance*" (26<sup>th</sup> October 2018), that they have grave concerns about the use of the 2016-based household projections. Although it is noted that this consultation is concerned with the application of the projections to the 'standard method' for calculating housing need in the Framework 2018, the Forum considers that this is a material consideration and one which is relevant to the Examination of the Guildford Local Plan. To understand the relevance of this consultation, it is necessary to explore the background to the Government's consultation and the implications for Guildford.

#### The National Growth Agenda

- 2.6 It is very important to recognise the context underpinning the Government's recent consultation on updates to national policy and guidance to which the Inspector refers, specifically concerning proposed revisions to the standard method for assessing local housing need. The primary objective of Government in relation to housing supply is ensuring that the planning system, principally through the plan-making process, continues to support the delivery of 300,000 homes per year by the mid-2020s<sup>1</sup>. This objective was included within the 2017 Budget, noting that the Government's approach to the delivery of new housing remains unchanged and has long been an ambition prior to the publication of the standard method. This has been the Government's plan long before the 2016-based projections were published and reflects the collective aims of the Government to deliver significant growth through the planning system which should be reflected through the Guildford Local Plan.

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<sup>1</sup> MHCLG *Technical consultation on updates to national planning policy and guidance*, 26<sup>th</sup> Oct 2018, para 7

- 2.7 It is important to also note that when the standard method was unveiled, set against the context of the 2014-based household projections, the standard method was capable of yielding circa 266,000 dwellings per annum<sup>2</sup>. This is still 34,000 dwellings short of the Government's target, which gives some credence to the Government's justification that the figures generated by the standard method should be a minimum, and plans should attempt to plan beyond this figure if appropriate.
- 2.8 Supported by changes to the Framework published in 2018, the Government remains committed to significantly boosting the supply of new homes, carried forward from Paragraph 158 of the Framework 2012, and that this would be achievable based on the 2014-based household projections as representing the most appropriate starting point. Consequently, it was the publication of the more recent 2016-based population and household projections by the Office for National Statistics that has prompted the Government to revisit the standard method, rather than any fundamental concerns as to the credibility of the 2014-based projections.
- 2.9 The Government could have easily taken the view that the more recent 2016-based projections meant that it should change its aspirations for housing supply and to support the delivery of fewer homes based on those projections<sup>3</sup>. However, the Government is clearly of the view that methodological changes are not a reason to change its aspirations, which in part is driven by a desire to address the worsening affordability of housing that affects large parts of the country through tackling the previous undersupply of housing<sup>4</sup>.
- 2.10 The ability to tackle these pressing issues would be undermined were the 2016-based projections to form the starting point for assessing housing needs, and the Government clearly recognises this. The Government has confirmed through paragraph 19 of the consultation document that in the short-term, the 2014-based projections present a reasonable basis for considering the demographic baseline for calculation. The same paragraph (clause 3) confirms that the methodology will be amended in time for the next set of projections. Given that these will be published in the summer of 2020 (2018-base) it is unlikely that any further changes to the methodology will occur in the short term, including any movement away from support of the 2014-based projections. There is a strong degree of certainty that the 2014-based projections will remain in force for some time and the Forum consider there is a strong basis for reverting back to the 2014-based projections.
- 2.11 Whilst the consultation on changes to the NPPG are technically not being directed at plans currently at examination (those 'transitional plans' referred to in the Inspector's note) like the Guildford Local Plan, this does not divorce those plans from recognising and responding to the Government's commitment to significantly boosting housing supply in England and to deliver 300,000 homes by the mid-2020s. This cannot be achieved if plans were to seek to adopt

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<sup>2</sup> Based on the 10 year period 2016-2026

<sup>3</sup> MHCLG *Technical consultation on updates to national planning policy and guidance*, Oct 2018, para 8 and 11

<sup>4</sup> MHCLG *Technical consultation on updates to national planning policy and guidance*, Oct 2018, para 12

projections that would result in significantly fewer homes being planned for (as is very likely if the 2016-based projections are applied). Furthermore, the Government recognises<sup>5</sup> that, in instances where the new (2018) standard method produces a figure that is lower than previously proposed figures in local plans (like in Guildford), this might increase delays and uncertainty in the plan-making, resulting in resource implications for the examination process. A simple solution to reduce uncertainty and possible further delays in the Local Plan process in Guildford is to proceed based on the 2014-based projections as the starting point for the calculation of the OAN, consistent with the approach that will be adopted nationally.

- 2.12 The Forum agree with the Inspector that Local Plans should be based on adequate, up-to-date and relevant evidence, and that the 2016-based household projections constitute the more recent projections. However, whilst in chronological terms this might be the case, we strongly suggest that these projections do not represent an adequate basis for assessing housing need in Guildford as required in Framework 2012 para 158, impacting significantly on their credibility and relevance to the calculation of the OAN. Their inadequacy is clearly reflected in the Government's proposed approach<sup>6</sup>, which sets aside the 2016-based projections in favour of the 2014-based data to be used as a credible starting point for the demographic baseline.
- 2.13 This is a reasonable conclusion to draw regardless of which methodology is used in the assessment of need (either the Framework 2012, the Framework 2018, or a modified 2018 Framework). This is because the Government is clearly of the view that the 2016-based projections would undermine their stated objectives in relation to significantly boosting the supply of housing (to deliver 300,000 homes by the mid-2020s) and is not the solution to the worsening affordability of housing evident across the country, and in Guildford specifically.

### The Local Position

- 2.14 The local impacts for Guildford, are detailed in the Council's Note on the latest projections (GBC-LPSS-033a). At paragraph 11 of this note, the Council identify that the updated 'starting point' for assessing the OAN is 313 dwellings per annum (dpa), over the plan period 2015-2034. The Forum broadly agrees with this, which is reflected in Table 1 below, alongside the past projections for Guildford.

*Table 1: Comparison of Guildford Household Projections*

	Households 2015	Households 2034	Change in HHs	in HH Per Annum	% Change
2012-based	56,199	65,771	9,572	504	17.0%
2014-based	56,843	67,196	10,353	545	18.2%
2016-based	55,591	61,623	6,032	317	10.9%

<sup>5</sup> MHCLG *Technical consultation on updates to national planning policy and guidance*, Oct 2018, para 21

<sup>6</sup> MHCLG *Technical consultation on updates to national planning policy and guidance*, Oct 2018, para 19

- 2.15 Table 1 above indicates that the 2016-based household projections are substantially lower than previous forecasts, representing a marked change from past trends. This is in part due to a change in the methodology for the projections, which is outlined as part of paragraphs 3 and 4 of GBC-LPSS-033b, prepared by GL Hearn ("GLH"). These paragraphs refer to the forecasting approach in the 2016-based projections, which rely on data of household formation between the two Census point 2001-2011. This differs from past approaches which have adopted a longer-term view, drawing from Census data as far back as 1971. The consequence of this change is that forecasts are limited to a period of high unaffordability, particularly for younger age-cohorts. As expressed in paragraph 4 of GBC-LPSS-033b, the 2016-based projections 'lock in' a lack of unaffordability as part of these projections, rather than relying on a longer period from which to establish a projection. The Forum shares this view and considers that this presents a strong justification as to why the 2016-based projections do not represent a credible basis from which to consider the OAN and would only serve to perpetuate trends of household suppression in the Borough.
- 2.16 In addition to the 2016-based household projections, it is also worth reflecting on the 2016-based population projections, as they represent the 'other side of the coin' in how the household projections are derived. These projections were subject to scrutiny as part of the Examination hearing sessions held in June 2018, indicating a downward movement in the population change of some 6,725 persons (Table 2 of GBC-LPSS-004 refers). This downward adjustment, led mainly by migration and assumptions relating to fertility/mortality, was something that was also experienced at a national level which saw growth decrease from 185,000 persons pa to 165,000 persons pa over a 25-year average.
- 2.17 This was reflected in the publication of the NPPF2 in and 2018 NPPG in July 2018, which included a clear health warning that the standard method might be subject to change following the publication of the 2016-household projections. The Government very quickly took note of the 2016 population projections and anticipated that when this was used to model household growth, this could have a perverse outcome with the overall objective to boost the supply of housing.
- 2.18 The Forum considers the credibility concerns related to the 2016-household projections are equally applicable to the 2016-based population projections. Although these represent a more up to date set of information, the Forum would not advocate that these population projections are used. Instead, it is proposed that the 2014-based population projections for Guildford are aligned with the household projections of the same date. This will ensure that there is a measure of consistency across the baseline data and will address any credibility concerns relating to the 2016-base data.

**2. Whether the calculation set out in the Council's paper "Update to OAN Assessment in Guildford as a result of the 2016-based Household Projections" (GBC-LPSS-033b) is an appropriate basis for calculating the OAN**

- 2.19 From the outset, it is worth noting that significant agreement has already been reached on how the OAN should be calculated, which has been subject to scrutiny through the Examination sessions held in June 2018. In particular, firm conclusions have been reached in relation to the level of employment growth that should be planned for and the Forum agree that the growth rate of 0.8%, indicated in the Inspector's Note ID/6 remains appropriate for the purposes of understanding the balance between jobs and future housing. The principal issue that separates the two parties is the most appropriate set of projections from which to apply the necessary uplifts. As currently drafted, the Forum cannot support the latest proposals from the Council as part of GBC-LPSS-033b, which are not soundly based and do not represent the OAN for the Borough.
- 2.20 As indicated above, the Forum does not consider that the 2016-based projections represent a robust or appropriate set of data from which to establish the 'starting point' for the calculation of OAN. These projections do not boost significantly the supply of housing and are contrary to the national objectives indicated above. In the context of the Council's most recent position (GBC-LPSS-033b), the 2016-based household projections are applied to a number of assumptions to arrive at the OAN of 562dpa (539dpa + 23dpa for student need). This relies on a number of assumptions, which are expressed in greater detail at the rear of document GBC-LPSS-SoCG-009. This document sets out the respective position of GLH on behalf of the Council and NMSS and aside from the input of the household formation rates from the 2016-based household projections, all other inputs remain the same. The Forum has considered this position, set against the 2016-based projections and arrives at a similar conclusion for how the employment-led OAN should be arrived at, on the basis of 0.8% growth.
- 2.21 It is noted that whilst the Council proposes a downward adjustment to the OAN, the requirement for affordable housing remains the same. As indicated at the rear of GBC-LPSS-SoCG-009, based on a notional target of 40%, a total of 1,293 dwellings would be required annually in order to meet the affordable housing need. The Council's latest calculation of OAN (GBC-LPSS-033b) makes no attempts to explore whether further uplifts to the OAN would facilitate the delivery of additional affordable housing and it is clear from the Council's position that the gulf between delivery and need would only worsen under the proposed arrangements.
- 2.22 The Forum does agree with a number of the assumptions used by GLH in this document, expressed as part of GBC-LPSS-003b:
- Adjustment for household suppression; Rates for age cohort 25-34 returned to 2001 levels;
  - Employment growth of 0.8% as an input to the OAN;
  - Uplift of 23 dwellings per annum to account for student need.



- 2.23 In terms of disagreement between the Forum and the Council, it is expected that an updated Statement of Common Ground can be prepared in advance of the resumed hearing sessions.
- 2.24 Following clear guidance from the Government, the Forum maintains that the 2014-based population and household projections should be applied as the baseline forecasts of household growth. As explained above, the credibility of the 2016 projections within the plan making process has been significantly diminished, and to rely on them now would be contrary to the Government's wider national housing objective for growth.
- 2.25 The Forum therefore relies on the use of the 2014-based projections as part of the calculation of OAN. The Forum's calculation incorporates the same assumptions relied upon as part of the Matter 2 statement submitted by the Forum in May 2018, albeit the employment growth rate of 0.8% has been considered, instead of the 0.9% rate considered previously.
- 2.26 In order to satisfy the 0.8% growth rate, endorsed through ID/5, the Forum calculates that the Council will need to deliver 653 dwellings per annum. A breakdown of the assumptions used to arrive at this calculation is included as part of **Appendix 1**. This is higher than the OAN proposed by the Council at GBC-LPSS-033b, however the Council would be expected to arrive at a similar conclusion, if modelled against the 2014-based population and household projections. In addition to the employment-led OAN, the Forum supports the evidence for an uplift to the OAN to account for student dwellings in the Borough, which presents an additional 23 dwellings per annum. Taking this into account, the Forum concludes that the OAN for Guildford should be **676dpa**.
- 2.27 Document GBC-LPSS-033b also makes reference to the calculation of the standard method, albeit this is framed against the 2016-based projections. Although GLH do not propose the standard method should be used, this is presented by way of illustrating the relationship to the Council's proposed OAN. Although the Forum do not advocate the use of the standard method here for context, it is noted that the current method of calculating the local housing need in the NPPF2 would arrive at a need of **752dpa**, when using the 2014-based projections as recommended. This is 190 dwellings higher than the current figure presented by the Council in their latest evidence (and 76 dwellings higher than the figure presented by the Forum. Although the standard method may be subject to change, this presents a clear direction of travel from the Government in terms of the expectations for growth in Guildford which will need to be met when the Council look to review their plan in the future.

**3. The implications of the Council's paper "GBC note on OAN following the 2016-based Household Projections" (GBC-LPSS-033a) for**

- **The overall housing requirement set by the Plan**

- 2.1 The Forum is concerned that the Council has sought to reopen the issue of housing requirement having settled the matter in Summer 2018. It is clear from GBC-LPSS-034 (dated 23 October 2018 i.e. before the publication of the Technical Consultation document on 26 October 2018 that the purpose of the Council's current stance is to seek to avoid contentious Green Belt releases rather than to achieve a Spatial Development Plan that responds to the needs of the Borough's residents.
- 2.2 That said the Forum's firm position is that the overall housing requirement set by the Plan should remain, at the very least, the figure agreed by the Council as being appropriate as set out in its Main Modifications to the Plan published in September 2018.
- 2.3 The 2016-based household projections should have no bearing on the housing requirement set in the Plan. If any change is to be made to the housing requirement given the Government current steer, the figure should increase as per the Forum's answers to Questions 1 and 2 above.

- **The housing trajectory**

- 2.4 Aside from the consideration of the 2016-based household projections and their impact on the housing requirement (considered above) there are two other key changes to note that have an impact on the housing trajectory set out in Appendix 0 of the Plan as proposed to be modified that are not reflected in the trajectory/5-year housing land supply evidence provided by the Council in GBC-LPSS-033a nor in GBC-LPSS-036.
- 2.5 Firstly the Secretary of State's determination of the Wisley appeal, which although this was reported and discussed during the Summer 2018 Examination hearings was not reflected by the Council in the delivery trajectory for that key site. The SoCG signed between the Forum and the Council dealing with the Housing Trajectory and 5-year HLS agreed the delivery trajectory for Wisley as set out in the submission version of the Plan only on the basis that the SoS granted Consent for the scheme, which did not occur.
- 2.6 The consequence of the SoS determination at Wisley is that the delivery trajectory (as reported verbally during the Summer 2018 Examination hearing session on Matters 4 & 5) will necessarily slip by at least 2 years from the start date previously envisaged by the Council.

- 2.7 The second key point to note is that the delivery trajectory for all Green Belt sites identified in the Plan (including those put forward by the Council in its Main Modifications consultation) is almost entirely dependent on the adoption of the Local Plan. At the time of the Summer 2018 Examination hearing sessions and indeed the publication of the Main Modifications for consultation the Council's adopted Local Development Scheme ("LDS") expected the Plan to be adopted in March 2019<sup>7</sup>. In fact this remains the Council published timetable for adoption of the Plan.
- 2.8 The actions taken by the leader of the Council in his letter of 23 October 2018 (GBC-LPSS-034) has inevitably delayed the Examination process and in turn the adoption of the Plan. In fact Councillor Spooner's letter confirms and accepts that his actions will lead to *'a requirement for a further delay and the possibility of another hearing, and we accept that position.'*
- 2.9 This delay has direct consequences for the housing delivery trajectory of those greenfield sites currently within the Green Belt that the Council is reliant upon for both meeting the overall housing requirement and indeed maintain a 5-year housing land supply.
- 2.10 In the Forum's view the delay is likely to be at least 6 months from the date originally envisaged taking account:
- The need for potential further Main Modifications to be prepared and consulted upon;
  - The Inspector to conclude and publish his report;
  - The May local Government elections and corresponding purdah period; and,
  - The necessary committee cycles to enable a resolution to be reach on the adoption of the Plan.
- 2.11 This has a direct consequence for the initial delivery trajectory of all greenfield sites within the Green Belt included in the Plan (together with the proposed Main Modification sites).
- 2.12 Neither this change in circumstance nor the position in relation to Wisley is reflected in the trajectories presented by the Council.
- 2.13 As the Inspector will recall from his note ID/006 the Council's housing trajectory is fragile, particularly in the initial years of the Plan period (after projected adoption takes place). Any delay therefore in the adoption of the Plan has a direct and negative impact on the housing delivery trajectory during that initial 5 year period, which is the most fragile.

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<sup>7</sup> Page 7 of LDS published on 04 September 2018

- 2.14 The trajectories attached at **Appendix 2** demonstrate that with the adjustments made to the greenfield Green Belt allocations and to Wisley the Council cannot deliver the required level of housing and in particular cannot demonstrate a rolling 5-year supply of housing (Liverpool and 20%) (**Schedule 1**). This problem persists even if the Council's suggested housing requirement (including Woking Unmet need (see Forum evidence below)) is applied (604 dpa), unless the proposed allocations introduced through the main mods are retained (see **Schedules 2 and 3**).
- 2.15 The key points to note from this analysis are:
- If the housing requirement remains at 671 dpa (as per the Main Modifications) the Council needs to retain all Main Modification sites and still has problems with its 5-year housing land supply due to the delay it has caused in the Examination process requiring the allocation of further land – **Schedule 1** ;
  - If the housing requirement is reduced to 604 dpa (as per paragraph 21 and Appendix 1 of GBC-LPSS-033a) the Council still needs all Main Modification sites to reach a position housing land supply– **Schedules 2 and 3**; and,
  - When an increased OAN as per the Forum answer to Questions 1 and 2 above is applied the situation is considerably worse – **Schedule 4**.
- 2.16 This analysis demonstrates the fragility of the Council's housing delivery trajectory and its sensitivity to even a 6 month change in the programme for the adoption of the Plan.
- 2.17 In the Forum's view there is now a need for the allocation of further sites beyond those advanced by the Council in the Main Modifications due to the delay in the delivery trajectory.
- **The 5-year housing land supply**
- 2.18 A further discrete point needs to be made in relation to 5-year housing land supply. Since the previous Examination hearing sessions took place (ending on 05 July 2018) the Government published the new National Planning Policy Framework on 24 July 2018.
- 2.19 Whilst this Plan is being examined under the transitional provisions and therefore its soundness needs to be tested against the Framework 2012 and corresponding NPPG, as soon as the Plan is adopted the matter of 5-year housing land supply will be tested against the Framework 2018 and the corresponding NPPG.
- 2.20 The Framework 2018 places the obligation on the Council to provide 'clear evidence' of deliverability within its 5-year housing land supply particularly in relation to major development subject to outline consents and housing allocations<sup>8</sup>.

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<sup>8</sup> Definition of Deliverable in Annex 2 on Page 66 of Framework 2018

- 2.21 In considering whether the Plan will be able to show a 5-year supply of deliverable housing land upon adoption it is therefore necessary now to consider the Council's ability to comply with the requirements of the Framework 2018.
- 2.22 The Council's only evidence on this matter comprises the tables in GBC-LPSS-033a (Appendix 1, 3, 4 and 5) and a single sentence in Paragraph 3.3 of GBC-LPSS-036. There is nothing to demonstrate the deliverability of the sites relied upon by the Council for the first 5-year supply after adoption of the Plan. Furthermore the Council's statement at Paragraph 3.3 that the Framework 2018 is not applicable now in relation to 5-year housing land supply is wrong. It does apply now.
- 2.23 The Council needs to be able to provide the 'clear evidence' otherwise it will face an immediate failure of the Plan in relation to 5-year housing land supply upon adoption. This is a problem that the neighbouring authority of Waverley is facing now. Following the adoption of its Plan in February 2018 two Inspectors in December 2018 and January 2019 have confirmed that against the Framework 2018 the Council does not have a 5-year supply of deliverable housing sites leading to a position of between 3.34 – 4.6 years with a 5% buffer. In effect the Plan failed within its first calendar year.
- 2.24 In the context of Guildford a 5-year housing land supply calculation as at 01 April 2019 has been undertaken by the Forum that confirms the Council's supply would be reduced by at least 1,460 dwellings<sup>9</sup> if all those sites that are either unallocated, proposed allocations or subject to outline consents that are major development are removed. This would reduce the 5 year supply position as at 01 April 2019 (using the housing requirement of 671 dpa) down to only **2.74 years (a shortfall of over 2,000 dwellings)**. (see **Appendix 3**)
- 2.25 This is a serious issue that has fatal consequences for the Plan and the Council has simply not addressed it in the evidence.

- ***The need for the additional sites included in the main modifications***

- 2.26 It is clearly evident from the above evidence that at the very least the Council needs to retain all of the Main Modification sites within the Plan. However, the delay the Council has caused to the adoption of the Plan combined with the publication of the Framework 2018 has had a direct effect on the Council's ability to maintain a rolling 5-year housing land supply and to have any real prospect of demonstrating a supply in the first year the Plan is adopted.

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<sup>9</sup> This calculation is set against the supply identified as at 01 April 2019 in the Forum housing trajectory in Appendix 2. Therefore if the Council's current assessment of supply was to be used the reduction would be greater

2.27 The consequence of the delay is that there is now a need for the allocation of further sites beyond those identified in the Main Modifications to address the clear shortfall in the early years supply. In effect the gap identified by the Inspector in ID/006 that the Council attempted to plug in the Main Modifications has now reopened.

**4. Whether it is possible at this point in time to come to conclusions on the issue of Woking's OAN and any unmet need**

2.28 The simple answer is yes. The Woking Core Strategy remains unchanged and in this respect the unmet need arising from Woking, as considered at the Examination in Summer 2018, remains unchanged. The allowance set out by the Inspector at Paragraph 12 of ID/006, namely 41dpa should remain unchanged.

2.29 It has already been made clear during this Examination that Woking's housing requirement is outside of the scope of this Examination.

2.30 Despite this the Council is seeking in GBC-LPSS-033a and GBC-LPSS-033c to recalculate Woking's housing requirement in an attempt to remove the unmet need component from its own housing requirement for the Plan.

2.31 Firstly it is important to highlight that the Council's documents (033a and 033c) and indeed Woking Council's review of its Core Strategy all took place prior to the publication of the Technical Consultation by Government on 26 October 2018. In this respect none of these documents reflect the clear Government view that the 2016-based household projections should not be used in the standard method calculation and instead the 2014-based household projections should be applied.

2.32 Secondly the Council's note GBC-LPSS-033c only includes in Appendix 1 the supplementary report presented to Woking Council. The full report, copy attached at **Appendix 4** confirms on Page 498 (3<sup>rd</sup> Paragraph) that Woking still expect an unmet need of around 117 dpa based on the applicable of the standard method and the 2014-based household projections.

2.33 Thirdly, RPS has run the standard method calculation for Woking based on the 2014-household projections and, this yields a housing requirement of 431 dpa. The Woking Core Strategy is providing 292 dpa. This generates an unmet need of 139 dpa or 2,363 dwellings over the 17 year Plan period. Waverley is accommodating a total of 1,577 dwellings (or 83 dpa over its 19 year Plan period). That leaves a residual requirement of 786 dwellings or 41 dpa (over the 19 year Plan period).

2.34 Therefore despite the Council's suggestions that no unmet need arises and notwithstanding the recent review of the Woking Core Strategy whether either the approach taken by the Inspector in ID/006 or, the application of the standard method utilising the 2014-based household projections is application, there is an unmet need of around 41 dpa to be dealt with in the HMA via this Plan.

2.35 It is clear therefore that the **unmet need of 41 dpa** should remain within the Council's housing requirement.

**5. Whether in view of current uncertainties (especially with regard to item 4) it would be appropriate to insert a review mechanism into the Plan and if so, how it would be phrase**

2.36 The Forum does not consider that there is uncertainty regarding unmet need in particular. Having said that and on a without prejudice basis should the Inspector consider it prudent to introduce an early review mechanism the Forum would suggest the following approach:

*'The Council will commence preparation of a Local Plan Review at the beginning of 2020 with submission of the Local Plan Review to the Secretary of State in 2022.'*

2.37 The above wording is considered necessary and appropriate for the following reasons:

2.37.1 Reason 1 – The outcome of the Technical Consultation is due to be published shortly, which will clarify the approach to be taken in relation to the standard method calculation for housing requirement and therefore establish the position in relation to the other authorities within the HMA;

2.37.2 Reason 2 – The next round of household projections (2018-based<sup>10</sup>) will be published in 2020 and therefore will provide the Council with the most up-to-date evidence with which to calculate its housing requirement; and,

2.37.3 Reason 3 – An early review must be earlier than the standard 5 year provision now set out for Councils to review all Plans.

2.38 Finally it is considered vital that any early review mechanism is included within a Policy and not just in the supporting text of the Plan. This is to reflect the importance of the issue. In this respect the Forum considers that either a new policy should be included in the Plan (based on the above wording) or the above wording should be included in Policy SP2.

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<sup>10</sup> This is on the assumption that the current approach to the calculation of housing requirements using the household projections remains unchanged