



Chris Banks
c/o Banks Solutions

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22nd January 2019

Dear Mr Banks

Reference: Guildford Local Plan Inspector's Matters and Issues ID-12

I write on behalf of the Burpham Community Association in response to the above.

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

The Guildford Local Plan is being examined against the policies of the NPPF 2012. Paragraph 158 states that Local Plans should be based on adequate, up-to-date and relevant evidence. We would therefore consider it appropriate to use the most recent figures available.

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-033b) is an appropriate basis for calculating the OAN.*

The calculation is not based on the "current and future" need required under paragraph 50 of the NPPF. It does not reflect the significantly lower household projections and we consider it an inappropriate basis for calculating the OAN.

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

- a. *the overall housing requirement set by the plan*
- b. *the housing trajectory*
- c. *the 5 year housing land supply*
- d. *the need for the additional sites included in the main modifications.*

Our responses are as follows

- a) The overall housing requirement should be reduced in line with the revised ONS projections.
- b) The reduction in need has ramifications throughout the life of the Local Plan, therefore the test for exceptional circumstances cannot be satisfied. It follows that three Green Belt strategic sites cannot be justified. A greater focus on town centre provision of brownfield

sites is needed. We also consider that infrastructure improvements must be implemented before any further housing to meet the acknowledged existing deficit.

c) Revised housing numbers will reduce the pressure on supply during the first five years of the Plan.

d) There should be a reduction in the number of early delivery sites. We note that a significant number of student homes has been proposed or already given permission, therefor freeing others early in the Plan.

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.

We consider that Woking's unmet need should be recalculated using the 2016 ONS figures before any decision is made. To allocate Guildford Green Belt land if there is no need would not satisfy the test of exceptional circumstances.

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 phrased.

We feel very strongly that the plan should be agreed in the usual manner; it should not take too long to recalculate the figures. There is a danger that, if the housing requirement number drops again from the 2016 figures, land currently taken out of the Green Belt will be open to uncontrolled development.

Yours sincerely,

Secretary
Burpham Community Association