

## **GUILDFORD BOROUGH COUNCIL LOCAL PLAN RESUMED HEARINGS**

**12<sup>TH</sup> AND 13<sup>TH</sup> FEBRUARY**

### **RESPONSE TO THE INSPECTOR'S MATTERS AND ISSUES ON BEHALF OF WAVERLEY BOROUGH COUNCIL**

This Statement on behalf of Waverley Borough Council is in response to the Inspector's Note dated 20<sup>th</sup> December, inviting comments on the implications of the 2016 household projections for the OAN and the housing requirement for the Guildford Borough Local Plan.

The Council will respond to the Matters and Issues set out in the Note (in bold below):

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

Waverley Borough Council notes the Inspector's comments regarding the fact that the Guildford Plan continues to be examined in the context of the 2012 NPPF and the reference to using the most recent demographic evidence.

Clearly, it is ultimately a matter for the Inspector to decide what is the most relevant and up-to-date evidence to determine the demographic starting point for establishing the OAN for Guildford. Waverley Borough Council understands the difference between a Plan such as Guildford's, that continues to be examined in the context of the 2012 NPPF, and the position of Plans examined under the 2018 NPPF, where the new Standard Method applies. However, this does create a somewhat unusual position where, in the Government's view, the latest 2016-based projections do not form a sound basis for determining housing need for Plans examined under the new NPPF, but where older plans, such as Guildford's, that are being examined under the transitional arrangements, may be able to rely on these projections that have themselves been called into question.

It is clear from the Government's recent Technical Consultation on updates to national planning policy and guidance, that the Government has questioned the validity of the 2016-based projections because they are derived from a period when not enough new homes were being built and that this would, therefore, have

constrained household formation resulting in the lower projections of household growth.

This clearly presents a challenge, given that the validity of the 2016-based projections may be short-lived. The risk is that the 2016-based projections are not providing an accurate basis on which to plan for future housing need. As a result, a Plan based on these projections may become quickly out of date which has implications both for Guildford and for its neighbours if it transpires that insufficient housing is being provided to meet the true need.

It is noted that, in its submissions, Guildford Borough Council has made some adjustments to its projections to try to address some of the potential shortcomings of the 2016-based projections. It will be for the Inspector, having heard all the evidence on the matter, to decide whether or not the adjusted 2016 projections are a sound starting point for calculating Guildford's OAN.

**3. The implications of the Council's Paper "GBC Note on OAN following the 2016-based Household Projections" for:-**

- **The overall housing requirement set by the Plan;**
- **The housing trajectory;**
- **The 5 year housing land supply;**
- **The need for additional sites included in the main modifications.**

Waverley Borough Council does not propose to comment in detail on this, other than to observe that one of the issues for the Plan had been delivery of housing in the early years to meet the needs that already exist. If there are any changes to the OAN arising from the above, then Waverley Borough Council would expect that Plan to continue to seek to address housing needs in both the short and longer term.

**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.**

In relation to this issue, Waverley Borough Council would simply wish to be assured that the Inspector will take a consistent approach, given that the same issue arose in relation to the Waverley Borough Local Plan. In that case, the Inspector concluded that Waverley should pick up 50% of the Woking unmet need that was identified at the time.

The 2015 SHMA provides the starting point for evidence on the OAN for Woking based on an assessment that is in the context of the 2012 NPPF, prior to the application of the Standard Method. It was the OAN for Woking, set out in the 2015 SHMA, that was used by the Inspector in the Waverley Examination to determine the level of unmet need set against the housing requirement set out in Woking's 2012 Core Strategy.

The Inspector has already indicated that Guildford Borough Council should be contributing to any unmet need from Woking and when Waverley Borough Council responded to the consultation on the Main Modifications to the Guildford Plan, it commented on the issue of consistency in the context of the period over which Guildford's Plan should be contributing to meeting Woking's unmet need.

On the wider issue of the amount of Woking's unmet need that should be picked up by other authorities, the Inspector's position in relation to Waverley's Plan was that it was not appropriate for him to seek to determine Woking's OAN, as it was outside the scope of the Examination. To do so would have required the Inspector to consider a number of factors. This would have included the demographic starting point, the uplift to meet economic needs, the uplift to address affordability, any uplift to address affordable need and Woking's ability to meet its need. Those matters were outside the scope of the Waverley examination and the Inspector has previously stated that they are outside the scope of the Guildford examination.

Guildford Borough Council has made reference to the recent report that was considered by Woking Borough Council in October 2018 in relation to whether there was a need to review the Woking Core Strategy. Clearly, going forward, any such review would be carried out under the 2018 NPPF with the application of the Standard Method. However, it is difficult at this point in time to reach a definitive conclusion on the likely future OAN for Woking when it does undertake a review of its Plan. Certainly, in the light of the recent Government consultation, it is difficult to see how Woking Borough Council would be able to rely on the use of the 2016-based projections as the basis for identifying its future needs. The fact remains that there is currently no date for when Woking is going to review its Plan in a way that might result in a change to the 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 phrased**

The Council does not have any particular comments to make on this issue other than to observe that there is a requirement to at least consider whether a Plan needs to be reviewed every five years in any event.