

FAO: Mr Chris Banks – Programme Officer
C/O Banks Solutions
64 Lavinia Way
East Preston
West Sussex
BN16 1EF

21st January 2019

Dear Mr Bore,

GUILDFORD BOROUGH LOCAL PLAN EXAMINATION IN PUBLIC – OAN AND HOUSING REQUIREMENT

CBRE Limited (Planning) (CBRE) acts as planning agents for Ashill (Respondent ID: 15805921) in respect of the Land North of Aarons Hill, Godalming (referred to as 'the site' hereafter). CBRE is instructed to submit written representations to the Inspector following the invitation for 'Attendees', in relation to the implications of the 2016 household projections for Guildford's OAN and the plan's housing requirement.

Ashill welcome the further opportunity to engage with Guildford Borough Council (GBC) and the Inspector following the proposed allocation of the site included in the Main Modifications (MM39). As detailed in our representation to the main modifications consultation (LPMM18/4306), the proposed allocation is sound in accordance with Paragraph 182 of the National Planning Policy Framework (NPPF).

Since the submission of our representations to the Main Modifications Consultation, the land adjacent to MM39 in the administrative area of Waverley Borough Council received a resolution to grant planning permission for 262 units following the Joint Planning Committee of the 9th January 2019 (REF: WA/2018/1239).

Matter 1: 2016-based Household Projections

Q1: The appropriateness of using 2016-based household projections for the basis of Guildford's Local Plan.

Planning Practice Guidance (Para 015) states that Household Projections published by the Department for Communities and Local Government should provide the starting point estimate of overall housing need. The last set of figures produced by the Department for Communities and Local Government is the 2014 based projections. The 2016 projections are published by the Office of National Statistics (ONS).

Planning Practice Guidance at (Para 016) states:

*'Wherever possible, local needs assessments should be informed by the latest available information. The National Planning Policy Framework is clear that Local Plans should be kept up-to-date. A meaningful change in the housing situation should be considered in this context, but **this does not automatically mean that housing assessments are rendered outdated every time new projections are issued.**'*

The intent of the guidance is clear that (1) consideration should be had to the latest figures but (2) new projections do not necessarily make previous housing assessments out of date.

The requirement in the paragraph for local plans to be kept up to date is relevant in the context of the situation facing Guildford. Whilst we acknowledge that the Guildford Local Plan is not being examined against the standard housing methodology, at the point of the first review of the strategic policies (as required by Paragraph 33 of the NPPF, 2018) in five years' time it is likely that there will be a shortfall against the figure required by the housing methodology.

GBC in their statement (GBC-LPSS-036) note that the 2018 NPPF will come into effect during the plan period. The MHCLG 'Technical consultation on updates to national planning policy and guidance' provides a clear steer on the Government's preference to use the 2014-based household projections in the short term, acknowledging that using the 2016 household projections would not achieve their target of 300,000 dwellings per annum by mid-2020's.

Although this is a consultation, it is important to note that based on the 2014 projections the housing need for Guildford for 2016 to 2026 would equate to 789 dwellings per annum (DPA) which is significantly higher than the proposed OAN of 630 DPA (not including Woking's unmet need allowance), identified by the Inspector in ID/6. Furthermore, against the OAN derived by the 2016 projections (562 DPA) put forward by GBC in GBC-LPSS-033a, there is even greater disparity.

Although the outcomes of the consultation are unknown at this stage, the need to review the plan within five years could result in a significant uplift in the local housing need, specifically, if an adopted plan uses the 2016 projections and with the subsequent review requiring the 2014 projections. In the context of Paragraph 14 of the NPPF the forthcoming confirmation on the appropriate household projection figures to use for the purpose of calculating objectively assessed need could represent 'rapid change'. Consistent with the NPPF, the plan should have the flexibility to respond to such rapid change – particularly in light of the direction of travel indicated by the Government through its consultation and therefore we support the Main Modifications.

Matter 2: Implications of OAN

Q2: 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.

Paragraph 29 of Planning Practice Guidance is clear that:

*'The total affordable housing need should then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments. **An increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes.***

Paragraph 13 of GBC-LPSS-033b deals with the proposed approach to affordable housing need. Whilst it is acknowledged by GLH that there is a 'notable level of affordable housing need', GLH do not believe that there should be a specific further adjustment to the OAN above 539 DPA.

A housing target of 562 DPA against an affordable housing target of 40% would result in the supply of 261 affordable homes per year. As set out in paragraph 5.23 of GBC-LPSS-SD-003 'With 40% affordable housing delivery, notionally 1,293 homes would be required to deliver the affordable housing need in full.'

Whilst we agree that it would not be sound for the full contribution to be included, there is a strong argument that an uplift should be applied to help in meeting affordable housing needs during the plan. In delivering a positively prepared plan, the plan should seek to make its fullest contribution to meeting affordable housing need and infrastructure requirements where it is reasonable to do so and consistent with achieving sustainable development.

A maintained housing target of 630 DPA compared to 562 DPA would produce a further 510 affordable homes during a 19-year plan period, making a significant and positive contribution to meeting objectively assessed needs for affordable housing.

Matter 3 – Implications for the Plan

Q3. 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**

In responding to (A) and for reasons further discussed in Matter 4, it is not possible at the time of writing to conclude that there is no unmet need arising from Woking Borough Council. With the Waverley Borough Council Local Plan Part I having recently been adopted with an element of Woking's Unmet Need, Guildford represents the only opportunity within the housing market area for any unmet need to be accommodated. In exercising its duty at Paragraph 182 to meet opportunities to address unmet need, it would be premature to adopt a housing requirement that makes no allowance for the likely unmet need arising from Woking Borough Council once the 2014 ONS figures are used.

In respect of (C), the commitment to deliver a rolling five-year housing land supply is supported, however the housing trajectory enclosed in the appendices of GBC-LPSS-033a demonstrates that the housing backlog from the persistent under delivery of housing remains negative until 2024/2025. The trajectory with the 2016-based projections limits the flexibility in the early years of the plan period should unforeseen adjustments be necessary. Furthermore, the reduction of the OAN to 562dpa would only further exacerbate the historic affordability issues in the Borough and likely contribute to a further backlog in affordable housing delivery (see Matter 2 response), therefore the overall housing requirement for Guildford should remain at 630 DPA.

Given the disparity between the proposed figure of 562 DPA and the figure of 789 DPA (when the standard housing methodology is used alongside the 2014 ONS figures) there is a significant risk that at the first review of the Guildford Local Plan (as required by the NPPF, 2018) a significant backlog has developed. This will present issues in ensuring that a rolling five-year supply is maintained during the course of the plan.

With respect to (D) and the Land at Aarons Hill, it is important to state that GBC-LPSS-SD-003 only deals with consideration of housing need and does not consider the relative benefits associated with allocating sites for development. As set out in our Main Modifications representations, the Land at Aarons Hill serves a significant function in delivering social sustainability objectives, delivering regeneration benefits in a priority neighbourhood for regeneration and supporting the viability and vibrancy of the local primary school which is currently faced with closure.

Furthermore, the recent resolution to grant in Waverley Borough Council reinforces the sound basis to amend the Green Belt in Guildford Borough Council to provide a more defensible and permanent Green Belt boundary to ensure that the Green Belt can endure over the plan period.

Accordingly, the response of GBC at Paragraph 22 of their statement oversimplifies the Exceptional Circumstances case that would exist in respect of Aarons Hill.

Matter 4 – Woking Unmet Need

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

With the Government's consultation on the use of the 2016 ONS figures having only recently closed, it would be premature for one to conclude that this resulted in their being no-unmet need arising from Woking Borough Council. It is clear from GBC-LPSS-SD-0033c that this is predicated on the assumption that the 2016 figures are used as the basis of the standard methodology. It is important to note that the Full Council Meeting being referred to took place on 18th October 2018 and pre-dates the Government's Consultation on how the 2016 figures should be used for the purpose of plan making (this commenced on the 26th October 2018).

It would be premature to conclude that no unmet need was to arise from Woking Borough Council.

The High Court has also recently confirmed that the approach taken in Waverley Borough Council to the issue of the unmet need arising from Woking Borough Council was procedurally robust.

Matter 5 – Review Mechanism

Q: 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.

As noted in response to Matter 3, the allocation of the Land at Aarons Hill has local Exceptional Circumstances that extend beyond housing alone and the consideration of the use of the 2014 and 2016 figures. The allocation of the site will significantly contribute to the vitality and viability of the local community, which is a priority neighbourhood for regeneration, not least through the generation of new families with children who could attend the local primary school, helping to make it more viable and hopefully remove the threat of its closure. It will also establish a more defensible boundary to the Green Belt.

Notwithstanding this, if the current Main Modification for the Land at Aarons Hill (MM39) was to be replaced with a more general review mechanism policy the phrasing of this should include the reference to the Land at Aarons Hill as a safeguarded site. Through the Sustainability Appraisal Report Addendum (September 2018) there is an existing evidence base that considers the merits of the site in meeting an increased housing trajectory.

Paragraph 85 of the NPPF (2012) states in respect of safeguarded land that local planning authorities should 'make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development.'

In GBC-LPSS-020 'GBC response to Item 5 Ways Forward and Item 14 Boosting housing supply and early years provision' it is apparent that development in the Green Belt will be the primary source of meeting an identified shortfall in housing. This further highlights the potential role played by safeguarded land as part of a Local Plan review.

Summary

For the reasons stated above, the adoption of the 2016 figures and assumption for the 2016 figures being used as a suppression of Woking Borough Council's OAN risks a significant under delivery of homes for the housing market area.

The suggested removal of the Land at Aarons Hill within the updated note prepared by GBC also simplified the Exceptional Circumstances case in this location which extends beyond housing need alone.

We trust that the above comments are helpful in informing discussions at the resumed hearings in February, where we will be in attendance. We would be grateful if you can confirm receipt of this Statement. Should you wish to discuss this matter in further detail, please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Adam Kindred", followed by a period.

ADAM KINDRED
ASSOCIATE DIRECTOR - PLANNING