

24 January 2019  
**Delivered by email**

Mr Jonathan Bore  
c/o Banks Solutions  
64 Lavinia Way  
East Preston  
West Sussex  
BN16 1EF

Ref: BLOR3011

Dear Mr Bore,

## **GUILDFORD LOCAL PLAN EXAMINATION**

We are writing to you, on behalf of Bloor Homes, in connection with the appropriateness of using the 2016-based household projections for the basis of Guildford Borough Council's Local Plan. In this regard, we have considered the implications this would have on the effectiveness of the Council's emerging Local Plan.

Following the publication of the 2016-based household projections, Guildford Borough Council made the decision to delay adoption of their emerging Local Plan in order to revise their Objectively Assessed Need (OAN) to reflect this new figure. However, shortly after this, the Government sought views on the following consultation document "*Technical consultation on updates to national planning policy and guidance*" which set out the ramifications of the 2016-based household projections on housing delivery.

The Government's recent consultation applies specifically to plans which employ the standard methodology for calculating OAN and which are being examined under the 2018 NPPF. Whilst, it must be noted that Guildford's Local Plan was submitted during the transitional period and as such, will be examined under the policies of the 2012 NPPF, the Plan should not be exempt from the warnings of the recent consultation.

This is demonstrated by recent Government responses to plans submitted under the transitional arrangements. These indicate their concerns regarding the 2016-based projections are indeed relevant to such plans as well. Their response to the Draft London Plan (submitted during the transitional period) states that the consultation "*is considered to provide relevant background to the level of weight that should be afforded to the revised household projections*". In this regard, it demonstrates the consultation should be afforded considerable weight irrespective of whether a plan is examined under the policies of the 2012 NPPF.

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Indeed the consultation reiterates the Government's commitment to the delivery of 300,000 homes per annum by the mid-2020s which cannot be achieved if transitional plans are allowed to reduce their housing requirements on the basis of the latest projections.

As well as this, Paragraph 158 of the 2012 NPPF states that Local Plans should be based on adequate, up-to-date and relevant evidence. Clearly the 2016-based projection represents the most up-to-date figure – there are, however, other relevant factors including affordability and duty to cooperate which should be considered. As such, evidence should not simply hinge on either the 2014 or 2016 based figure. The Government confirms this by stating that household projections should only be used as starting point. In this regard, we consider the Council has not adequately taken account of the worsening affordability in the Borough nor has it responded to Woking's unmet need. The Council have, therefore, not *adequately* considered all relevant evidence in reaching their OAN.

As noted previously, the 2016-based projections do constitute the most up-to-date evidence. However, paragraph 2a-016-20150227 of the PPG states that:

*“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”.*

As such, this demonstrates that the most recent projections will not always be the most appropriate to use. Within the context of the Government's most recent consultation and its caution over the 2016-based projections, we, therefore, do not consider they should render the 2014-projections (as a starting point) out-of-date.

Irrespective of the above, it is important to consider Guildford's proposed housing requirement within the wider context of its plan period and future decision-making. The implications of the Council's approach will render the Plan in conflict with the Framework as soon as it is adopted, specifically Paragraph 60 which sets out that the local housing need should be informed by the standard methodology. As the 2016 projection will be far less than required by the standard methodology, this will of course result in the application of paragraph 11 of the NPPF due to the conflict between the plan and national policy.


Whilst the 2016-based figure constitutes the most up-to-date evidence, we consider that it is neither adequate nor relevant to justify the Council's proposal to minimise its housing requirement. In any case this is not a debate regarding the application of either the 2014 *or* 2016-based projection: rather, which figure should be used as a starting point. In this regard, this letter shows the application of the 2016-based figure as either a starting point *or* the figure for housing need is short-sighted; it would compromise the effectiveness of the plan and create uncertainty as a result of the inevitable application of the presumption in favour of sustainable development.

It is also important to note that irrespective of the agreed housing requirement for Guildford Borough, this is a starting point and is not a cap on development. We have previously made representations about the suitability of Nutbourne Farm as an extension to the Gosden Hill proposed allocation and would reiterate that planning for a higher number of homes on sites which would contribute to the overall aims of the Plan and the Government's ambition to significantly boost the supply of housing. The housing requirement for the Borough should be considered within that context.

We trust these views will be taken into account by the Inspector. We can confirm that we do not intend to appear at the re-convened hearing sessions in relation to this matter.

If you have any queries please do not hesitate to contact me.

Yours sincerely

A handwritten signature in cursive script that reads "Clara Millar".

Clara Millar  
**Assistant Planner**

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