

## **GUILDFORD LOCAL PLAN**

### **WISLEY ACTION GROUP AND OCKHAM PARISH COUNCIL**

#### **STATEMENT FOR RESUMED HEARINGS 12 AND 13 FEBRUARY 2019**

##### **Introduction/Summary**

1. This Statement is prepared by Wisley Action Group ("WAG") and Ockham Parish Council ("OPC"), following advice from leading counsel, in response to the Inspector's Note **[ID/12]** in order to set out WAG/OPC's position ahead of the resumed hearings scheduled for 12 and 13 February 2019.
2. The resumed hearings are required due to the publication of the Government's 2016-based household projections, prepared by the Office for National Statistics ("the 2016 Household Projections").
3. The 2016 Household Projections, which should be used as part of the evidence base for the Local Plan, have profound implications for the OAN and, as a consequence, for the soundness of the Local Plan as currently prepared, both the submission version and with main modifications. This is particularly in relation to the housing requirement and the knock on effect on all allocations that remove land from the Green Belt ("the Green Belt Allocations"). These include the proposed new settlement, to provide 2,000 homes, at the former Wisley Airfield (Site Allocation A35). The 2016 Household Projections are relevant to more than merely the additional sites included in the main modifications.
4. The 2016 Household Projections mean that there will be a very considerable over-supply as against OAN, such that the Green Belt Allocations cannot be justified by reason of unmet housing need (the Inspector already has WAG's and OPC's case that there are no exceptional circumstances for the release of Allocation A35 from Green Belt in any event, but this Statement of course focusses on the effect of the 2016 house projections, as per the Inspector's Note). Certainly, the 2016 Household Projections mean that a new settlement cannot be justified, and Allocation 35 should be removed from the Plan.
5. This Statement addresses the Matters and Issues in the Inspector's Note **[ID/12]** in turn, but with this caveat: although the Matters and Issues do not include it, the 2016 Housing Projections are directly relevant to *all* Green Belt Allocations in the Plan, not merely the additional sites included in the main modifications.
6. WAG and OPC rely on the helpful Notes prepared by NMSS in relation to the effect of the 2016 Household Projections on the OAN, commissioned by others. It is understood that the NMSS Notes will be submitted by others, but they are attached here for ease of reference.

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

7. The Government's 2016-based Household Projections should be used. They are the most up-to-date projections and it would be unsound to draw on outdated household projections (in particular, it would be unsound to use older, 2014-based, projections as the evidence base for the Local Plan). See (2012) NPPF 158, 159 (in particular first bullet, first sub-paragraph) and 182.

**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.**

8. No. The uplifts to the demographically based housing need made by GL Hearn, and relied on by GBC, are not justified. The correct figure is 361dpa, as explained by NMSS, or, at most, a figure of something less than 400dpa.
9. As regards the demographically based housing need, GBC-LPSS-033b produced by GL Hearn sets out a figure of 313dpa. NMSS arrive at 301dpa. The difference is modest.
10. GL Hearn then increase their 313dpa on two principal grounds, neither of which are sound and/or soundly calculated, and a further more modest ground (regarding students) which is also unsound.

*GL Hearn's use of 2001 household formation rates.*

11. The first principal ground relied on by GL Hearn is 'a further adjustment to household formation rates of younger persons (25-44) back to historic levels to return to the levels seen in 2001'. This change sees GL Hearn increase dpa by 83, from 313dpa to 396dpa. However, this change unjustifiably reverses the Government's deliberate decision to rely upon more recent trends, from 2001, in arriving at the 2016 Housing Projections. If soundness demands that the 2016 Housing Projections be used, which it does, the methodology behind those projections cannot then be reversed, or at least not without cogent justification. No such justification exists. GL Hearn's adjustment here is also inconsistent with the methodology set out in the Inspector's Guidance Note **[1D/6]**, as GBC acknowledge in GBC-LPSS-033a at para.9.
12. The NMSS Notes provide further reasoning as to why GL Hearn are wrong to reverse-engineer the 2016 Housing Projections based on 2001 household formation rates.

*GL Hearn's use of an economic activity rate at variance with a 0.8% job growth rate*

13. The second principal ground relied on by GL Hearn is described in GBC-LPSS-033b as 'Economic Led Housing Need' (see paras.11-12). GL Hearn explain that this adjustment increases dpd from 313dpa to 450dpa (more if GL Hearn's first principal adjustment is made). NMSS, by contrast, arrive at an uplifted figure of 361dpa.
14. The difference, explained in summary form in the NMSS Notes, and in detail in GBC-LGSS-SoCG-009 (GBC 'Objectively Assessed Housing Need Position Statement', which incorporates a Statement of Common Ground between GL Hearn and NMSS), turns on GL Hearn's use of an economic activity rate that is only one third of the assumed 0.8% jobs growth rate, and a standalone calculation for Guildford that sidesteps the question of whether there would be enough workers to meet the employment needs of other local authorities if they were calculated on the same basis. By contrast, NMSS have used an Experian forecast that fits best with the Inspector's assumed 0.8% jobs growth rate, which forecast is drawn from a national model with consistent assumptions.

*GL Hearn's student numbers uplift*

15. GL Hearn's final uplift is to add 23dpa to reflect 'expected growth at the University'. The Inspector accepted this uplift in **[ID/6]**, but it is worth reflecting further on this in light of the 2016 Household Projections. GL Hearn proceed on the basis that *none* of the projected growth in the 18-23 age group relates to students. That is implausible. The overwhelming likelihood is that the projected growth in the 18-23 age group includes students, and that the demographically based housing need figures of 301-313dpa (NMSS/GL Hearn respectively) entirely provide for anticipated student growth.
16. On a related point, and as GBC's Hearing Statement explains at para.3.4, since the previous examination hearings there have been two grants of planning permission for student accommodation.

*Conclusion*

17. GL Hearn have uplifted the demographic projections by over 70% to arrive at an OAN. In and of itself, such a significant uplift requires the closest scrutiny. On inspection, it cannot withstand analysis, as NMSS have shown.
18. The correct uplifts to the demographic projections arrive at an OAN of 361pa, as explained by NMSS.
19. But even if the Inspector were to take the view that the correct answer lies somewhere between the figures advanced by GL Hearn and NMSS, the weight of argument lies overwhelmingly with the NMSS calculations, and the figure should not be more than 400dpa.

**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**

**\* the housing trajectory**

**\* the 5 year housing land supply**

**\* the need for the additional sites included in the main modifications.**

20. The implications of GBC-LPSS-033a are, clearly, that the overall housing requirement currently set by the Plan is too high, even on GBC's OAN figures. However, the prior question is whether GBC's paper GBC-LPSS-033a reflects a sound approach, which it does not, as it relies upon the GL Hearn work (as addressed above).
21. The housing requirement should be derived from the OAN of 361dpa, as explained by NMSS, or, at most, no more than an OAN of something less than 400dpa.
22. As regards trajectory, the reduction in the requirement might also favour a return to the back-loaded approach GBC proposed in the submission Local Plan, as opposed to the approach in the main modifications version.
23. The 5 year housing land supply is, clearly, sufficient.
24. Most importantly, though, the OAN arrived at from the 2016 Housing Projections means that there is no need for *any* of the Green Belt Allocations to meet housing need, not merely no need for any of the additional sites included in the main modifications.
25. WAG/OPC appreciate that this point goes beyond the scope of the Inspector's Matters/Issues, but it is the elephant in the room that cannot be ignored and must be addressed.
26. The over-supply would be such that it is impossible to argue that exceptional circumstances for Green Belt release were made out on the basis of housing need.
27. If the requirement was taken as the demographic projections of 301dpa-313dpa, the over-supply would be approaching 9,000 homes, without including the additional sites within the main modifications.
28. If the requirement was taken as NMSS' 361dpa, the over-supply would be approaching 8,000, again without including the additional sites within the main modifications.
29. Even if the requirement was taken as GL Hearn's 562dpa, the over-supply would be approaching 4,000, again without including the additional sites within the main modifications.

30. On any view, the Green Belt Allocations are not required and, of particular relevance to WAG/OPC, a new settlement through Green Belt release at the former Wisley Airfield is not required (we refer to the representations and submissions previously made by WAG/OPC, as to why it is Allocation A35 does not represent sustainable development and should not be 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.**

31. Yes. Woking has no unmet need. GBC's Statement provides the detail here.

**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.**

32. The answer to this depends in large part on the approach the Inspector takes to items 1-4 above, but also other matters not discussed above.
33. Brexit looms large. The Inspector may decide that the NMSS figure of 361dpa is too optimistic as regards an economic uplift to the demographic projections of 301-313dpa. In those circumstances, if the Inspector were to take a conservative approach as regards the economy, it might be that a review should be built in.
34. However, WAG/OPC see no call for a review mechanism in relation to the matters raised by item 4 above.

**Wisley Action Group**  
**Ockham Parish Council**  
**24 January 2019**