

## OPENING REMARKS FOR GBC

12<sup>th</sup> February 2019

1. GBC's position remains as set out in its Notes numbered 33 and 36.
2. GBC acknowledges the restricted extent to which matters can be re-opened. However, adopting the correct approach is important. As it understands it, the sole focus of the 5th question is whether, on the basis of the current evidence, it is necessary to recommend modifications making provision for 4 further sites – “the modification sites” – in order for the plan to be sound. If it is not so necessary, the modifications should not be made. The contribution of each site needs to be individually considered, and justified.
3. It is also important to note that the question of soundness does not arise from the overall level of housing provision to be made over the life of the plan. On any reasonable assessment the overall land allocation for housing will exceed the housing requirement significantly, consistent with government guidance to “meet objectively assessed needs, with sufficient flexibility to adapt to rapid change”. It will undoubtedly “boost significantly the supply of housing”. Indeed some have argued that it does too much, but that argument is behind us. The current focus is solely on early delivery, particularly in the first 5 years.
4. In general terms, GBC notes that the sooner the plan is adopted, the sooner sites can come forward.
5. However, there have been two separate changes of circumstances that require to be considered to ensure a robust plan that is capable of surviving challenge.
6. First, there are new household projections. They are highly material, and GBC have quite properly been invited by the Inspector to consider them.
7. Without seeking to pre-empt detailed discussion in respect of the first and second questions, it appears to GBC that whilst the new figures should not be taken account of uncritically, that does not mean they should be discarded or effectively ignored – which is the position of the housebuilders.
  - That would not accord with Government policy [*- which refers to the household projections as the “starting point”<sup>1</sup> for estimating OAN; emphasises that they are “statistically robust”<sup>2</sup>; and expressly states that “assessments should be informed by the latest available information.”<sup>3</sup> Ignoring the 2016 figures is not to be informed by them.]*

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<sup>1</sup> Paragraph: 015 Reference ID: 2a-015-20140306

<sup>2</sup> Paragraph: 017 Reference ID: 2a-017-20140306

<sup>3</sup> Paragraph: 016 Reference ID: 2a-016-20150227

- Further, that would not accord with the consultation exercise – [*which is only a consultation, but in any event conspicuously does not suggest any policy change for plans subject to the transitional provisions of the NPPF*];
  - There is no support elsewhere for such approach – whether that be in the Government’s response to the London plan or the approach of other Inspectors. Assertions to the contrary take remarks out of context.
8. It is indeed a surprising argument that ONS data published by the largest independent producer of official statistics and the 2recognised national statistical institute of the UK should constitute *inadequate* data.
  9. It is not at all surprising, for example, that the ONS no longer consider evidence from 1971 is appropriate to inform household formation rates. The “housing” world is very different. Nor that it should choose 2001. For instance, it is only since 2001 that the census stopped assuming that a man is necessarily the head of the household. No one will argue otherwise. Affordability is one of a wide number of factors affecting household formation rates, as Mr McDonald illustrates – NMSS.
  10. There is a very good case for reducing the housing requirement, the only issue is by how much. GBC considers that bearing in mind that additional sites would of necessity come from the Green Belt and given the overall housing supply, there is no justification of the modification sites and they are not required for the plan to be sound.
  11. In any event, in terms of early delivery new student permissions, granted since the last hearing sessions, have eased the pressure in that regard, delivering broadly equivalent numbers expected from the modification sites.
  12. Secondly, there is Woking’s position. It has reviewed its plan. That review has not been challenged. It has decided that it does not need to provide more sites on the basis, amongst others, that it has no unmet need. It is not for this plan process to reconsider or review that decision. As a matter of law, the circumstances are entirely different to that which prevailed at the Waverley inquiry or at the first set of hearings at this inquiry when Woking was asserting quite the contrary position. The starting point is now not that of a neighbouring Council giving evidence clearly indicating that there is an existing level of unmet need which is likely to persist in the future – but the contrary.
  13. Notwithstanding Woking’s position. GBC have gone on to consider what a further review of Woking’s plan might entail if the current consultation produces an outcome that accords with the current proposals. If it was inevitably that a future contribution was needed then perhaps it could be argued that provision may need to be made now (but even that is problematic).
  14. However, there is no such certainty:

- If result of the consultation causes Woking BC to further review its plan, and
- if they do so but do not carry out a proper Green Belt review, and
- if when assessed there is still unmet need notwithstanding Waverley's contribution (which appears unlikely)

then GBC are likely to have to consider making provision for them. Note the current mechanisms for councils within HMAs and need for statements of common ground.

15. GBC consider that there is a compelling case to review whether a contribution to Woking's need is *currently* required to make the submitted plan sound given Woking's clear position that that they have no need – independent of the advent of household projections – and there is, to put it mildly, significant uncertainty as to whether there will be unmet need in the future.
16. Rhetorically, how can it be justified to remove land from the Green Belt to assist Woking in such circumstances?
17. Finally, as to Cllr Spooner's letter. It understandably highlights the concerns arising from the proposed inclusion of "additional, highly sensitive Green Belt sites". If they are not shown by rigorous assessment to be properly justified they are not required to demonstrate that the plan is sound.
18. As he states, GBC "accept that there is a genuine housing crisis in [our] Borough". The Council has demonstrated throughout this process a desire to deal with that crisis making difficult political decisions to take significant sites out of the Green Belt and it has not sought to reduce the number of sites originally proposed notwithstanding ostensible changes in circumstances which might have given scope for such an approach. It has not advocated the necessary minimum approach. It simply contends that these extra 550 units are not required to make the plan sound.

**Guildford Borough Council**

*[Italicised words in brackets not read]*