

EXAMINATION OF THE GUILDFORD BOROUGH LOCAL PLAN: STRATEGY AND SITES

EXAMINATION STATEMENT ON BEHALF OF THE GUILDFORD HOUSING FORUM

Matter 4 – Housing Trajectory

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1.0 Introduction

- 1.1 This Examination Statement provides a response on behalf of the Guildford Housing Forum ("the Forum"), to those Questions raised by the Inspector (dated 20 April 2018), relating to the Housing Trajectory contained within Guildford Borough Local Plan: Strategy and Sites ("the Plan") and its supporting evidence base.
- 1.2 In addition to the above, this Statement specifically highlights which areas of the Plan are considered to be unsound, and the basis upon which it fails the tests of soundness, and the changes sought.
- 1.3 This Statement has been prepared by Neame Sutton on behalf of the Forum.

2.0 Matter 4 – Housing Trajectory

- 2.1 The starting point here is to confirm that the Plan's trajectory, which is based on an arbitrary stepping up across the plan period is not a sound basis for meeting housing need.
- 2.2 The Council has an acknowledged (Para 3.11 of GBC-LPSS-001) that it has a persistent history of under delivery such that a 20% Buffer should apply to its supply assessment and trajectory¹. In fact and, as confirmed in the Forum Statement on 5-Year HLS², the Council's persistent history extends to some 10 consecutive years.
- 2.3 This background combined with the fact that the Council has been operating in a relative Development Plan policy vacuum since the expiry of the previous Local Plan period in 2006 demonstrates the importance of this Plan taking the appropriate corrective action as defined by the Framework to significantly boost the supply of housing and to address any shortfall in the early years of the Plan period.
- 2.4 The approach currently being taken by the Council seeks to engineer a trajectory in order to demonstrate a rolling 5-year housing land supply rather than properly grappling with the task of allocating and delivering sufficient sites to bring about the required step change in delivery.

¹ Paragraph 47 - Framework

² Forum Statement on Matter 5 – Table 1

2.5 This cannot be a sound approach to take.

2.6 The Forum has explored the detail of the Council's trajectory and for the reasons set out in the remainder of this Statement and its Appendices the clear evidence points to a standard uniform annual average housing requirement rather than a stepped approach.

Is the Housing Trajectory as set out realistic and deliverable?

2.7 The short answer to this is no.

2.8 Before exploring the detail of the trajectory it is important to highlight the following fundamental concerns with the evidence supporting it:

1. The evidence that underpins the trajectory is generally to be found in the October 2017 LAA and its Appendices³. This document does not however contain complete evidence to enable the figures within the trajectory to be properly tested;
2. As the Neame Sutton tables set out in Appendix 2 demonstrate the methodology employed by the Council in assessing its supply sources contains numerous inaccuracies and contradictions when the capacity of individual sites is considered;
3. In a number of instances the mathematics in the supply figures do not add up or contain double counting;
4. Sites are included and relied upon that have no realistic prospect of delivery;
5. Unrealistic expectations have been placed on the delivery from strategic sites without any supporting evidence; and,
6. The trajectory is also heavily reliant on as yet unallocated sites (otherwise known as windfalls), which are divided between various supply categories and together amount to approximately 2,500 dwellings or 20% of the total supply identified to meet the minimum housing requirement in the Plan.

2.9 The trajectory as defined by the Council in Appendix 1 to Question 3 in GBC-LPSS-001 is therefore inherently unreliable and cannot be properly assessed in terms of the soundness of the supply sources it relies on.

³ GBC-LPSS-SD-006a

Issues with Supply Sources:

- 2.10 The series of supply tables at Appendix 2 of this Statement set out the detailed issues with the various supply sources relied upon by the Council as far as is possible to determined with the evidence that the Council has made available.
- 2.11 A summary table is set out below that deals with the total figures relied upon by the Council.

Table 1: Summary of overall Housing Trajectory Supply

Supply Source	Council Position	Neame Sutton Position	Comments
Completions	839	839	Agreed
Outstanding Capacity (commenced)	362	362	Agreed
Outstanding Capacity (approved)	1385	1603	See Appendix 2 – Table A1
Windfall	750	750	Agreed
Rural exception	90	90	Agreed
Town Centre	1221	1269	See Appendix 2 – Table A2
Guildford Urban Area	399	394	See Appendix 2 – Table A3
Slyfield Area Regeneration Plan	1000	900	See Appendix 2 – Table A8
Ash and Tongham (Urban Area)	54	44	See Appendix 2 – Table A4
Ash and Tongham (countryside)	1125	826	See Appendix 2 – Table A4
Within villages	154	151	See Appendix 2 – Table A5
Villages (proposed to be inset from GB)	272	270	See Appendix 2 – Table A6
PDL in GB	395	384	See Appendix 2 – Table A7
Wisley	2000	1720	See Appendix 2 – Table A8
Gosden Hill	1700	1300	See Appendix 2 – Table A8
Blackwell Farm	1500	910	See Appendix 2 – Table A8
Keens Lane	150	150	Agreed
North of West Horsley	120	120	Agreed
West of West Horsley	135	135	Agreed
Horsley Railway Station	100	100	Agreed
Garlick's Arch	400	400	See Appendix 2 – Table A8
West of Winds Ridge	40	40	Agreed
TOTAL	14191	12757	Difference of: 1434

- 2.12 On the basis of detailed site by site assessment of the supply information available and, when appropriate evidence⁴ is applied to the strategic site delivery rates the total housing supply identified by the Forum is considered to represent a more realistic starting point for assessing the Council's trajectory.

⁴ Start to Finish – NLP (November 2016)

2.13 In terms of the deliverability of the trajectory the Forum's analysis concludes that the assumptions made by the Council are unrealistic and not corroborated by any evidence. By contrast the delivery trajectory set out by the Forum in the attached Appendix 1 represents a more appropriate and deliverable approach based on sound evidence.

Is there a need for a stepped trajectory?

2.14 In short no. The adjustments made to the Council's supply sources and delivery rates by the Forum serve to highlight the fact that the stepped trajectory approach actually results in a failure of the Council's strategy in the later years of the Plan period. The degree of failure depends on the method employed to address the shortfall (Liverpool vs Sedgfield – See Forum 5-year HLS Statement⁵).

2.15 The second key point to note is that there is a requirement for increased delivery in the early years of the Plan period to address the significant backlog earlier and remove the prospect of a rolling 5-year supply shortfall in the early years.

2.16 This approach would result in the Plan providing a robust delivery strategy, which would only serve to be strengthened in the event that the strategic sites out perform the expectations set out in the Forum figures as supported by the NLP report⁶.

2.17 The Council's reliance on a stepped trajectory therefore seeks only to rectify the short term housing land supply problem but at the same time it generates a problem in the later years of the plan period. This does not bring about the required significant boost to the supply of housing that is necessary and would address both the short term supply problem and ensure the longer term delivery remains sound.

The capability to increase delivery in the short term:

2.18 The Council argues in GBC-LPSS-001 that it cannot deliver more housing in the short term due to the Green Belt constraint, highway considerations and availability of SANG. This 'bars' to increasing delivery are however all contradicted by the Council's own evidence, namely:

- **Green Belt Constraint** – The Council has identified a series of Green Belt releases that it states will deliver in the first 5 years of the Plan period – The Forum agrees with this. The Green Belt boundary review confirms that other similarly deliverable sites could be released and thereby increase the short term supply;

⁵ Forum Matter 5 Statement – Tables 5 and 6

⁶ As per footnote 4

- **Highway Considerations** – The Council has not tested this option to determine if further sites were bought forward in the short term whether they could be accommodated – This constraint cannot be said to be insurmountable at this stage; and,
- **SANG Availability** – This relates primarily to Ash and Tongham. The consents granted in this location thus far are dependent on the delivery of SANG within the control of one of the Forum members (Bewley Homes Plc). The initial SANG area has been provided for at least 18 months⁷. It is the Council that is currently delaying the approval of a Deed of Variation to enable the SANG to be transferred to the Land Trust rather than the Council, as well as the discharge of Grampian conditions enabling the consented sites to deliver completions. The Council therefore has the control to increase delivery rates in this area. It is also relevant to note that one of the recently consented schemes in Tongham benefits from its own separate SANG. Furthermore one of the recent consents in the area, granted on appeal, includes its own SANG (Land at The Street, Tongham), which will add further capacity for the area.

2.19 With regard to increasing capacity, the density calculations applied by the Council particularly in relation to Ash and Tongham underestimate the potential in that area. If the density that has been achieved on consented sites of 19.5dpha is applied to the remaining allocation area at least a further 130 dwellings could be provided. If a higher density of 25dpha was to be considered then this area has the potential to yield another 300 dwellings. This is one example of where additional early delivery could be achieved in a location unaffected by the SRN⁸.

3.0 Changes Sought

3.1 The Forum requires the following changes in relation to the Housing Trajectory:

1. Revision to the supply sources as set out in the Appendices to this Statement;
2. Reversion to a uniform annual housing requirement; and,
3. Consequent allocation of more small – medium sized sites to address shortfall.

⁷ Prior to the SANG provision being made there has been a period of at least 5 years where no SANG provision was in place

⁸ A number of Forum Members have land control in this allocation that could assist with early delivery