

EXAMINATION OF THE GUILDFORD BOROUGH LOCAL PLAN: STRATEGY AND SITES

EXAMINATION STATEMENT ON BEHALF OF THE GUILDFORD HOUSING FORUM

Matter 5 – 5-Year Housing Land Supply

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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 5-Year Housing Land Supply ("HLS") 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 5 – 5-Year Housing Land Supply

(i) Is the methodological basis for calculating the 5-year housing land supply sound?

- 2.1 This paper examines the Council's current 5-year Housing Land Supply. As a starting point it is relevant to note that the Council does not appear to know what its current 5-year Housing Land Supply actually is. Supply calculations are identified in numerous locations across the relevant evidence all of which reach separate conclusions, namely:
- Housing Topic Paper (as at 2018) – between 3.72 – 4.65 years¹
 - Housing Trajectory (as at 2018) – 5.05 years²
 - LAA Addendum June 2017 (as at 2017) – 2.36 years³
- 2.2 Additionally the Council has openly agreed supply figures as low as 2 years in the context of recent Planning Appeals, most notably the Guildford Railway Station scheme (Policy A7).

¹ Housing Delivery Topic Paper – December 2017 – Appendix 6 and 7

² Based on the housing trajectory in Appendix 1 to Question 3 of GBC-LPSS-001

³ Page 12 of LAA Addendum June 2017

- 2.3 The Council has only published one calculation of 5 year supply prior to the Submission of the Plan, which is the 01 April 2017 assessment set out in the LAA Addendum – June 2017. No previous assessments are publicly available.

The Starting Point for the 5-Year Period:

- 2.4 In the Forum's view the starting point should be 01 April 2018. However, this starting point presents a problem given the lack of corroborated completion data i.e. the Council still has 148 dwellings in its commitments for the 2017/18 monitoring year⁴.

The baseline requirement:

- 2.5 The starting point (until any revisions are made to the OAN) must be 654 dpa as set out in the Plan.

The extent of the Shortfall:

- 2.6 This is derived from the period 2015 – 2018 and equates to approximately 975 dwellings based on the OAN of 654 dpa⁵.

Method for Dealing with the Shortfall (Liverpool vs Sedgefield):

- 2.7 The NPPG⁶ advises that wherever possible the shortfall should be addressed in the first 5-years. The Forum is of the view that the Council should be taking this approach. The Council's arguments for not adopting this approach⁷ do not reflect its own trajectory evidence that clearly demonstrates an expectation of significant uplift in annual delivery rates from the point the Plan is adopted. If the Council's delivery rates are correct then the Sedgefield method should be applied.

The Buffer:

- 2.8 The Council's past delivery performance speaks for itself. The Forum and the Council are in agreement that it has a history of persistent under delivery and that a 20% Buffer should be applied. For the Inspector's information the table below sets out the Council's performance relative to the relevant requirement (as far as is possible to ascertain):

⁴ Neame Sutton is working with the Council to agree this base date and obtain corroborated completion data.

⁵ Source: Appendix 1 to Question 3 in GBC-LPSS-001

⁶ NPPG – Paragraph 035 Reference ID: 3-035-20140306

⁷ Housing Delivery Topic Paper – Paragraph 4.199 – 4.201

Table 1: Comparison of completions against requirement 2001 – 2017

Year	Completions	Requirement	Shortfall/Surplus	Cumulative
2006/07*	357	422#	-65	-65
2007/08*	478	422#	56	-9
2008/09*	130	422#	-292	-301
2009/10*	227	422#	-195	-496
2010/11*	190	422#	-232	-728
2011/12*	262	422#	-160	-888
2012/13*	234	422#	-188	-1,076
2013/14*	137	422#	-285	-1,361
2014/15*	242	422#	-180	-1,541
2015/16*	387	654##	-267	-1,808
2016/17*	294	654##	-360	-2,168
2017/18**	306	654##	-348	-2,516

*Source: Page 51 Housing Delivery Topic Paper – December 2017

**Source: Appendix 1 to Question 3 GBC-LPSS-001

#Source: Paragraph 4.2.16 Housing Delivery Topic Paper – December 2017

##Source: Local Plan Submission version

2.9 The last 12 consecutive years clearly confirm a substantial shortfall equating to **-2,516 dwellings**.

Calculation of 5-Year Requirement as at 01 April 2018:

2.10 The Council's calculation is not based on a sound methodology in that it uses Liverpool and 20% buffer and also it is based on a stepped trajectory with a lower annual requirement than the OAN for the initial 5 years from 01 April 2018.

2.11 By contrast the Forum approach is to apply the OAN of 654 dpa, Sedgefield and a 20% buffer.

2.12 The table below summarises the differences in the two approaches:

Table 2: 5-Year Requirement Comparison

	Council	Forum
Baseline requirement 2018 - 2023	2,554 [^]	3,270 ^{^^}
Shortfall 2015 - 2018	60.9 [*]	975 ^{**}
Baseline plus shortfall 2018 - 2023	2,614.9	4,245
20% Buffer	523	849
Adjusted Requirement	3,137.9	5,094
Annual	627.5	1,018.8

*Liverpool

[^]Stepped trajectory in Local Plan

**Sedgefield

^{^^}Uniform OAN of 654dpa

See Appendix 1 for detail

- (ii) How many years' supply of deliverable housing land exist at present, having regard to the housing trajectory, the current supply position, and the plan's housing allocations

2.13 The answer to this question is not straightforward.

2.14 Prior to the adoption of the Plan any proposed allocations in the Green Belt would fail the footnote 11 test in the Framework and cannot therefore be regarded as deliverable in the 5 year period. Immediately upon the adoption of the Plan those sites can be included in the supply.

2.15 On that basis and using the Council's evidence available (which contains numerous gaps) the Forum has undertaken a review of the Council's supply sources (see Appendix 2 attached to Matter 4 Statement). The summary of the 5-year supply for the period 01 April 2018 – 31 March 2023 is set out in the table below (before and after the adoption of the Plan):

Table 3: 5-Year Housing Land Supply Comparison – Before Adoption of the Plan

	Council	Forum
Outstanding Capacity (commenced)	148	148
Outstanding Capacity (approved)	1,385	1,603
Windfalls	120	120
Rural Exception	24	24
Town Centre	72	120
Guildford Urban Area	148	143
Ash and Tongham (urban extension)	137	96
Within villages	63	60
PDL in Green Belt	94	84
Wisley	50	50
TOTAL	2,241	2,448

Requirement 2018 – 2023	3,137.9	5,094
Shortfall/Surplus	-897	-2,646
5-year Supply	3.6	2.4

Table 4: 5-Year Housing Land Supply Comparison – After Adoption of the Plan

	Council	Forum
Outstanding Capacity(commenced)	148	148
Outstanding Capacity (approved)	1,385	1,603
Windfalls	120	120
Rural Exception	24	24
Town Centre	72	120
Guildford Urban Area	148	143
Ash and Tongham (urban extension)	137	96
Within villages	63	60
Villages (proposed inset from GB)	182	180
PDL in Green Belt	94	84
Wisley	50	50
Gosden Hill, Guildford	50	0
Blackwell Farm, Guildford	50	0
Keens Lane, Guildford	113	113
North of West Horsley	90	90
West of West Horsley	102	102
Horsley Railway Station	75	75
Garlick's Arch	250	100
Winds Ridge, Send	40	40
TOTAL	3,193	3,148

Requirement 2018 – 2023	3,137.9	5,094
Shortfall/Surplus	55	-1,946
5-year Supply	5.09	3.09

2.16 The table below shows the various scenarios based on the Council's and Forum's positions in terms of 5-Year Supply before the adoption of the Plan and after adoption:

Table 5: Comparison of relative positions – Before Adoption of Plan

	Council	Forum
Liverpool 20% - Stepped Trajectory	-897	-690
	3.57	3.90
Sedgefield 20% - Stepped Trajectory	-1994	-1787
	2.65	2.89
Liverpool 20% - Uniform OAN 654 dpa	-1756	-1549
	2.8	3.06
Sedgefield 20% - Uniform OAN 654 dpa	-2853	-2646
	2.2	2.4

Table 6: Comparison of relative positions – After Adoption of Plan

	Council	Forum
Liverpool 20% - Stepped Trajectory	55	10
	5.09	5.02
Sedgefield 20% - Stepped Trajectory	-1042	-1087
	3.77	3.72
Liverpool 20% - Uniform OAN 654 dpa	-804	-849
	3.99	3.94
Sedgefield 20% - Uniform OAN 654 dpa	-1901	-1946
	3.13	3.09

2.17 It is clear from the above that the Council's supply position upon the adoption of the Plan is, at best, a fragile 5.09 years. When the correct methodology (Sedgefield and 20% buffer) is applied the position changes to 3.77 years at best. The position worsens significantly when the corrections are made to the supply sources and a uniform OAN is applied. This analysis confirms the current housing delivery strategy in the Plan is unsound and that further housing allocations are required in order to create a sound trajectory that will ensure a rolling 5 year supply can be maintained.

3.0 Changes Sought

3.1 The following changes are sought to the Plan:

1. Change to the methodology employed to calculate 5-year supply to Sedgefield 20% and based on uniform OAN; and,
2. Consequential increase in allocations in the first 5-year period to significantly boost supply of housing and introduce choice and competition in the market for housing.