GBC note on OAN following the 2016-based Household Projections

1. The Council considers that the latest 2016-based household projections, very recently published by ONS in September 2018, will have a significant impact upon Guildford’s OAN. This paper seeks to summarise the impact that these latest projections on Guildford’s OAN, as well as setting out the implications for the emerging plan.

2. This paper should be read together with the accompanying note from GL Hearn (GLH).

3. The latest household projections will also have an impact on Woking’s OAN, and this paper also gives consideration to that issue.

4. In summary, whilst these updated projections provide no justification for revisiting the approach that was established during the hearing process, they do require a reconsideration of the application of that approach in arriving at a housing figure. For the avoidance of doubt, the Council is not proposing a reconsideration using the standard methodology.

Guildford’s OAN

5. Document ID-6 clearly sets out the building blocks that were used by the Inspector in calculating Guildford’s OAN at the time of the hearing sessions. This identified a demographic starting point of 422 dpa based on the application of the household formation rates in the 2014-based household projections to the latest 2016-based population projections.\(^1\)

6. However, having concluded that economic growth of 0.8%pa was realistic, Document ID-6 concluded that the economic-led housing need was higher than the demographic-starting point, in the order of 607dpa. A further 23 dpa was added to account for an increase in students requiring market housing.

7. In total, this resulted in an OAN of 630 homes which was a 49% uplift on the demographic starting point of 422 dpa. Document ID-6 concluded that the scale of this uplift would address key factors that are known to place pressure on the housing market, and that no further uplift was necessary. However, market signals should continue to be monitored.

8. The Council’s position statement\(^2\) that explored the impact of the 2017 Mid-Year Population Estimates followed what we understood to be a consistent methodology to that set out in Document ID-6 and concluded that the OAN for Guildford was only marginally reduced at 629 dpa.

\(^1\) For calculation of this figure, see Implications of 2016-based SNPP for Guildford (GBC-LPSS-004)

\(^2\) GBC-LPSS-SoCG-009
9. The accompanying GLH note carries out a further assessment utilising the latest 2016-based household projections. The approach to calculating the revised OAN uses a consistent methodology to that previously undertaken with the exception of a greater adjustment to take account of a past suppression in household formation rates.

10. The 2016-based household projections impact on each stage of the calculation of Guildford’s OAN in Document ID-6, save for the uplift to meet student demand.

11. **First**, the 2016-based household projections reduce the demographic-starting point for Guildford to 313dpa. However, for the reasons explained in the GL Hearn paper, the Council considers it appropriate to make a further adjustment to household formation rates of younger persons (25-44) back to historic levels and to return to the levels seen in 2001. This would result in a demographic-led need of 396dpa. This adjustment is not as a proxy for a market signals uplift, but rather to ensure that the Council does not plan for a worsening trend in household formation rates.

12. **Second**, continuing to assume a 0.8% per annum growth in employment, but updating to use the 2016-based household formation rates, reduces the economic-led housing need to 450dpa. If, as the Council considers appropriate, this figure is adjusted to address household formation rates of younger persons, the economic-led housing need is 539dpa.

13. Once a further uplift of 23 dpa is included to account for increased student growth, this results in an OAN of 562dpa, which is 80% higher than the demographic starting point of 313dpa. This is significantly higher than the uplift above the demographic starting point set out in Document ID-6 (49%).

14. Given the significant scale of uplift above the demographic starting point, the Council does not consider a further or specific additional uplift to address market signals is necessary.

15. For context, were the standard method to apply then, based on the 2016-based household projections, Guildford’s OAN would be 431dpa. An OAN of 562dpa is almost 25% above this figure.

16. It follows that the 2016-based household projections (even when adjusted to address the continuation of low household formation rates) result in an OAN which is 11% lower than the currently identified figure of 630dpa. The Council consider that a reduction of this magnitude should have a significant impact on the emerging Local Plan with Main Modifications. It is noted that the reduction due to the 2016-household projections is significantly greater than anticipated by GLH in their earlier notes.
Implications for the Submission Local Plan with Main Modifications

17. The MM version of the plan is currently out for consultation.

18. The Main Modifications include a housing requirement for Guildford of 630 dwellings per annum over the plan period (2015 – 2034). In light of the revised OAN for Guildford, as reflected on above and in the attached note, the Council consider that there are implications for MM2 and specifically Guildford’s housing requirement.

19. The Main Modifications include new potential site allocations necessary to deliver the following requirements which were considered necessary in order for the plan to be found sound:
   - An allowance for Woking’s unmet need (42 dpa for the 15 years of the plan period post adoption of the plan)
   - A non-phased Liverpool approach to calculating the rolling five year supply

20. However, in the context of the new OAN of 562dpa for Guildford, the above requirements can be achieved without the need for the additional proposed new site allocations, as listed below:
   - Aaron’s Hill, Godalming (200 units)
   - East of Glaziers Lane, Flexford (105 units)
   - Hornhatch Farm, Chilworth (80 units)
   - Aldertons Farm, Send Marsh (120 units)

21. Appendix 1 indicates the rolling five year land supply position on the basis that the contribution towards Woking’s unmet need remains unchanged (the potential implications of the 2016-based household projections on Woking’s unmet need is discussed further below).

22. This demonstrates that the new sites are no longer necessary for the Council to maintain a robust rolling five year supply from the date of adoption. On this basis, the Council considers that the benefits of meeting the additional housing need previously identified earlier in the plan period are no longer present to outweigh the harm of allocating additional sensitive Green Belt sites.

Woking’s OAN

23. The new 2016-based household projections also have a significant impact on Woking’s OAN. For the purposes of calculating Woking’s unmet need during the examination process, the OAN assessed in the West Surrey SHMA 2015 was used as the basis. This figure (517 dpa) is based on the 2012-based household projections, which is now outdated by two more recently published household projections. Consideration was given by GBC during the hearing sessions to a wholesale reconsideration of Woking’s unmet need but it has
been made clear by the Inspector that this was outside the scope of the examination process.

24. Woking has now undertaken a review\(^3\) (see extract in Appendix 2) which would trigger the proposed mechanism in the Submission Local Plan with Main Modifications (MM2) for a GBC review of the potential contribution to unmet need and the appropriate methodology for undertaking this review is the standard methodology. As GLH make clear in their note, applying the new standard methodology demonstrates that there is no unmet need even without the contribution from Waverley. This clearly represents a change to the position that Woking advanced during the hearing sessions during June/July 2018.

25. If it is accepted that Woking’s unmet need will only be determined through the application of the new standard methodology given that Woking’s plan is more than five years old and is not caught by the transitional arrangements, then the analysis of whether unmet need exists is as follows:

- Standard methodology utilising the 2016-based household projections = 263
- This is 29 dpa less than Woking’s Core Strategy requirement which results in no unmet need arising from Woking, with significant over-provision given the allowance included within Waverley’s adopted Local Plan Part 1

26. Appendix 3 indicates the rolling five year land supply position on the basis that there is no contribution towards unmet need.

27. The Council accepts that the standard methodology is being reviewed by MHCLG and that a draft methodology will be published for consultation around Christmas.

28. If, therefore, an approach is adopted which simply recalculates Woking’s unmet need using the latest household projections (including an adjustment to take account of suppressed household formation rates of the 25 – 44 age group), but otherwise maintaining a consistent set of assumptions to that contained in the West Surrey SHMA 2015 in relation to economic data, results in a revised OAN for Woking of 434 dpa (see the accompanying note from GL Hearn).

29. Applying an OAN of 517 dpa, Woking’s unmet need was calculated and apportioned between Waverley and Guildford as follows:

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Note: there has been no liaison with GBC in relation to this review with neighbouring authorities and the statement in the paper that there is unmet need of 117 dpa does not use the latest 2016-based household projections with the standard methodology.
• 517 (OAN) – 292 (Woking Core Strategy requirement) = unmet need of 225 dpa
• 225 dpa multiplied by the 14 years of Woking’s plan period (2013/14 – 2026/27) = 3,150
• 50% of 3,150 = 1,575 (allowance for Woking’s unmet need in Waverley’s Local Plan)
This equates to 83 dpa over Waverley’s plan period (1,577 in total)
• 20% of total unmet need (3,150) or 40% of residual unmet need (1,573) = 630 (allowance for Woking’s unmet need in Submission Local Plan with Main Modifications)
• This equates to 42 dpa over the 15 years of Guildford’s plan post adoption

30. However, if utilising the recalculated OAN for Woking of 434 dpa, Woking’s unmet need would be calculated as follows:
• 434 (OAN) – 292 (Woking Core Strategy requirement) = unmet need of 142 dpa
• 142 dpa multiplied by the 14 years of Woking’s plan period (2013/14 – 2026/27) = 1,988
• 1,577 (allowance for Woking’s unmet need in Waverley’s Local Plan)
• 1,988 – 1577 = 411 unmet need remaining

31. The residual unmet need of 411 units equates to 21% of the total unmet need remaining. If using a consistent approach to that previously undertaken, the potential Guildford contribution can be calculated in two ways.

32. **First**, as 20% of the total unmet need:
• 20% of total unmet need of 1,988 = 398
• This equates to 26 dpa over the 15 years of Guildford’s plan post adoption

33. **Second**, as 40% of the residual unmet need:
• 40% of residual unmet need of 411 = 164 (consistent with the approach taken in the Submission Local Plan with Main Modifications)
• This equates to 11 dpa over the 15 years of Guildford’s plan post adoption

34. This analysis indicates that, even ignoring the standard methodology, the 2016-based household projections warrant a reduction in any potential contribution by Guildford towards Woking’s unmet need. If continuing to use the previous SHMA methodology to calculate OAN, the potential contribution towards Woking’s unmet need should be either 11dpa or 26dpa, depending on which approach is followed.

35. In addition to the significant impact that Guildford’s revised OAN has on the emerging plan with main modifications, the reduction in Woking’s OAN further justifies the removal of the new site allocations from the plan. Appendices 4
and 5 indicate the rolling five year land supply position on the basis that the contribution towards Woking’s unmet need is reduced to either 20% of the total unmet need arising from Woking (Appendix 4) or 40% of the residual unmet need remaining (Appendix 5).

**Ways forward**

36. The potential implications of the new projections on the emerging plan are therefore significant.

37. The Council understands that this significant new material could lead to a delay in the adoption of the plan due to the likely need for further consideration through some form of examination process. As stated in paragraph 4 above, GBC consider that in applying the new projections there is no need to review the approach established through the hearing sessions and as set out in Document ID-6.

38. Given the significant implications in relation to this issue proper consideration at this stage could help prevent future challenge.

39. As to use of the standard methodology, the Council understands and accepts that its plan (unlike any review of Woking’s plan) is being examined using the transitional arrangements. However, it notes that the figure resulting from the revised standard methodology will nevertheless usefully indicate the level of development that the Government would consider sufficient in boosting housing supply at a national level yet set at a figure that is deemed to be deliverable and appropriate at the local level. Any decision to adopt would be made with the knowledge of the OAN figure that would be derived for both Guildford and Woking using the revised standard methodology. The Council understands that consultation on a draft methodology is expected possibly by the end of 2018 but certainly by 24 January 2019.
## Appendix 1: Rolling five year land supply position with an unaltered contribution to Woking’s unmet need

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Appendix 2a: Extract from Review of the Woking Core Strategy - Appendix 1 (pages 8 - 9)

Full document available to view online at:
Evidence base studies

The NPPF requires the preparation and review of local plans to be based on proportionate, up to date and relevant evidence about the economic, social and environmental characteristics and prospects of the area, taken into account market signals. In particular, the NPPF requires local plans to be informed by local housing needs assessment conducted using the standard method in national planning guidance and to carry out a Strategic Housing Land Availability Assessment (SHLAA) to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period.

The Core Strategy was informed by the 2009 Strategic Housing Market Assessment (SHMA) and the 2011 SHLAA respectively, and other evidence base such as Transport Assessment, Sustainability Appraisal and Habitats Regulations Assessment. At the time, the SHMA identified an objectively assessed housing need of 594 dwellings per year. The Secretary of State accepted that given the constraints of the area and the available evidence, a housing requirement of 292 dwellings per year is appropriate. Sufficient land was identified in the 2011 SHLAA to enable the delivery of about 13 years supply of housing against the housing requirement. The Core Strategy identifies the Green Belt and the Town Centre as future direction of growth to identify sufficient land to meet housing need between 2022 and 2027. Land is to be released from the Green Belt to enable the delivery of at least 550 dwellings between 2022 and 2027. The SHMA was reviewed in 2015 to bring it up to date. The SHLAA was review in 2014 and is presently being reviewed. The latest SHMA identifies an objectively assessed housing need of 517 dwellings per year, significantly less than the need identified in 2009 SHMA. By applying the standard method required by the NPPF, the objectively assessed need come down further to 409 dwellings per year. There is a clear downward trend of the objectively assessed housing need. The 2016 Sub National Population Projections have been published. The 2016 Household Projections have now been published (September 2018). The implications of these on the objectively assessed housing need is being worked out, but the initial indications are that the objectively assessed housing need would come down to about 266 dwellings per year. Adding a 5% buffer to this figure will take the need to about 279 dwellings per year.

The Council has reviewed its SHLAA and has also carried out a Green Belt boundary review. These are informing the preparation of the Site Allocations DPD which will allocate land to enable the comprehensive delivery of the Core Strategy. A draft Site Allocations DPD has been published for Regulation 18 consultation, and there is evidence to demonstrate that sufficient land can be allocated to enable the comprehensive delivery of the Core Strategy over the entire plan period. Land is also being safeguarded to meet future development needs. It is acknowledged that there is an unmet need of about 225 dwellings per year arising from Woking Borough which the Council is working in partnership with neighbouring authorities to address within the housing market area. By using the standard method, the unmet need is likely to be 117 dwellings per year.

Section 5 and paragraphs 24 – 27 of the NPPF require local planning authorities to use their evidence base to ensure that their local plan meets as a minimum their objectively assessed housing needs taken into account the unmet needs of neighbouring areas, as far as is consistent with the policies set out in the NPPF. Under these requirements, joint working should enable local authorities to work together to meet development requirements which cannot wholly be met within their own areas. Waverley Borough Council has recently adopted its Local Plan (February 2018). In accordance with the NPPF, the Waverley Local Plan has committed to meet about 50% of Woking’s unmet housing need. This is equivalent to about 83 dwellings per year throughout the life of their local plan. The Guildford Borough Local Plan has just been through a Local Plan Examination (July 2018). The Inspector’s Report is yet to be published. In the meantime, the Inspector had indicated during the
hearing that the Guildford Local Plan should be able to meet about 20% of Woking’s unmet need.

Average housing delivery across the borough since 2006/07 to date is broadly in line to the 292 dwellings per year housing requirement. Taking into account the period of recession, over the 11 year period there is an under supply of just about 74 dwellings when cumulative completions are considered since 2006. The relatively small under supply figure masks recent trend in housing provision. In 2015/16, 360 dwellings were delivered. In 2016/17, 399 dwellings were delivered. It is therefore reasonable to assume that at least the 292 average housing requirement will be delivered during the plan period. This will be monitored, and where necessary appropriate measures will be taken to ensure the delivery of the requirement. Average housing completions since 2012 when the Core strategy was adopted is about 302 dwellings per year, which is above the 292 annual housing requirement.

**Five year housing land supply position statement (2017)**

The Council has published its five year housing land supply position statement. It identifies sufficient land to enable the delivery of 7.7 years of housing against the housing requirement. This is over and above the national requirement to identify five years supply of housing land. Combined with the evidence provided in the SHLAA and the proposals in the draft Site Allocations DPD, there is robust evidence to demonstrate that sufficient land have been identified to enable housing delivery over the entire Core Strategy period and enough deliverable sites for at least the next five years.

**Sustainability Appraisal Report of the Woking Core Strategy**

Paragraph 32 of the NPPF requires local plans and spatial development strategies to be informed by a Sustainability Appraisal that meets the relevant legal requirements. The SA of the Core Strategy assessed various options for housing provision. In particular, three options for housing provision were appraised to assess their impacts using the SA Framework. The options were the provision 292 dwellings per year, 499 Affordable Housing dwellings per year and 594 dwellings per year. The SA Report concluded that the damage that housing delivery of 499 Affordable homes or 594 dwellings will cause to the environment will far outweigh any benefits that they will bring to the borough. The Secretary of State agreed that the SA Report was robust evidence to justify the 292 dwellings per year housing requirement for the Core Strategy. Given that the SA Framework continues to be relevant and the constraints of the area have not change since the adoption of the Core Strategy, the 292 housing requirement should continue to apply during the plan period and the focus should be towards its delivery. Further analysis regarding housing land supply including evidence of the Green Belt boundary review report is provided below to support this conclusion. The Council has reviewed a number of its evidence base studies and none justifies a significant change in the main conclusions of the SA.

**Other evidence base**

There is proportionate, appropriate and robust evidence to support the Site Allocations DPD and to demonstrate that the Core Strategy can comprehensively be delivered. This includes up to date transport assessments and transport mitigation studies, Green Belt boundary review to ensure that land released from the Green Belt does not undermine its purposes and integrity, a revised Employment Topic Paper and an emerging revised Infrastructure Delivery Plan. An SA of the Site Allocations DPD and a Habitats Regulations Assessment has also been carried out. A full list of the evidence base studies is in Appendix 1 of the Site Allocations DPD. There is nothing presented by way of the available evidence to require an immediate modification of the Core Strategy or to demonstrate that the housing requirement can be increased to meet the objectively assessed need without damage to the environment.
Appendix 2b: GBC response to Woking's Review of the Woking Core Strategy
Mr Ernest Amoako  
Planning Policy Manager  
Woking Borough Council  
Gloucester Square  
Woking  
Surrey  
GU21 6YL

Via email only  
17 October 2018

Re: Review of Woking Core Strategy (WBC18-025)

Dear Mr Amoako,

We understand that a review of Woking’s Core Strategy is being presented at the Council meeting on Thursday 18th October 2018 for approval. Guildford Borough Council (GBC) was given no forewarning of the review and have not been consulted on it. Indeed, GBC first became aware of the review on 15th October 2018.

The failure to engage constructively, actively and an ongoing basis with GBC in relation to the review is plainly contrary to both the spirit and legal requirements of the Duty to Co-operate, see in particular Planning and Compulsory Purchase Act 2004, s.33A(1), (2) and (3)(a), (d)&(e).

GBC would wish to respond substantively to a number of issues within the review, particularly those with cross-boundary implications. However given the limited time-frame it is unable to do so in an informed manner.

However, one point of immediate concern in the review must be raised at this stage. The review considers the issues of local housing need for Woking, as well as the unmet need in the Housing Market Area. It rightly identifies that the objectively assessed need (OAN) for Woking in the 2009 SHMA was 594dpa, and that the 2015 SHMA reduced the OAN to 517dpa. In light of the revised NPPF, it then calculates the OAN (now referred to in the revised NPPF as ‘local housing need’) for Woking, using the standard method and based on the 2014-household projections, as 409dpa. Following the recent release of the 2016-household projections, application of the standard method reduces the local housing need still further to 266dpa (by GBC’s calculations it is 263dpa, but this is a minor difference). Subject to the 3dpa difference in the latest housing need, GBC’s provisional view is this part of the review accurately summarises the position.

However, the review then states that “by using the standard method, the unmet need is likely to be 117 dwellings per year”. GBC understand that this figure is arrived at by subtracting the housing requirement figure in the Core Strategy (292dpa) from the local...
housing figure produced by applying the standard method and 2014-household projections (409dpa). This is plainly flawed. If – as GBC agree is broadly correct – Woking’s local housing need is 266dpa based on the application of the standard method and the 2016-household projections, this means that there is no unmet need (the housing requirement of 292dpa being greater than the local housing need of 266dpa). It is illogical to, on the one hand, base the local housing need figure on the latest household-projections, but not then to update the amount of unmet need in light of that figure.

Both the failure to comply with the Duty to Cooperate and the defective logic in concluding that there remains an unmet need of 117 dwellings per year render the review legally flawed.

GBC trust that you will take these concerns seriously. In particular, we request that approval of the review be deferred in order that it can be reconsidered by Officers and that engagement with GBC (as well as other relevant bodies) required by the Duty to Co-operate has been undertaken.

We understand that Runnymede Borough Council are intending to raise concerns of their own relating to the review.

Yours Sincerely,

Tracey Coleman

Director of Planning and Regeneration
Tel: 01483 444 201
Guildford Borough Council
Millmead House
Guildford
Surrey GU2 4BB
## Appendix 3: Rolling five year land supply position with no allowance for unmet need

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### Pre-adoption
- **First five years:**
- **6-10 YEARS:**
- **11+ YEARS:**

### Total
- **10678**

### Key Terms
- **Annual housing target:**
- **Years remaining:**
- **Supply:**
- **Backlog/Surplus:**
- **Backlog/Surplus annualised over remaining plan period:**
- **1 year requirement + (5x annualised backlog/surplus):**
- **1 year requirement plus 20% buffer:**
- **1 year supply:**
- **1 year housing supply:**
Appendix 4: Rolling five year land supply position with an allowance for 20% of Woking’s unmet need

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Pre-adoption First five years 6-10 YEARS 11 - 15 YEARS Total

Pre-adoption:
- 2015/2016: 562
- 2016/2017: 562
- 2017/2018: 562
- 2018/2019: 562
- 2019/2020: 562
- 2020/2021: 588
- 2021/2022: 588
- 2022/2023: 588
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- 2030/2031: 588
- 2031/2032: 588
- 2032/2033: 588
- 2033/2034: 588
- Total: 11068

First five years:
- Annual housing target: 562
- Years remaining: 19
- Supply: 387
- Backlog/Surplus: -175
- Backlog/Surplus annualised over remaining plan period: -10
- 5 year requirement + (5x annualised backlog/surplus): 2836
- 5 year requirement plus 20% buffer: 3472
- 5 year supply: 3472
- 5 year housing land supply: 2.62

6-10 YEARS:
- Annual housing target: 562
- Years remaining: 18
- Supply: 294
- Backlog/Surplus: -443
- Backlog/Surplus annualised over remaining plan period: -26
- 5 year requirement + (5x annualised backlog/surplus): 2911
- 5 year requirement plus 20% buffer: 3472
- 5 year supply: 3472
- 5 year housing land supply: 3.10

11 - 15 YEARS:
- Annual housing target: 562
- Years remaining: 17
- Supply: 284
- Backlog/Surplus: -706
- Backlog/Surplus annualised over remaining plan period: -44
- 5 year requirement + (5x annualised backlog/surplus): 3018
- 5 year requirement plus 20% buffer: 3472
- 5 year supply: 3472
- 5 year housing land supply: 3.10

Total:
- Annual housing target: 562
- Years remaining: 15
- Supply: 1133
- Backlog/Surplus: -1054
- Backlog/Surplus annualised over remaining plan period: -66
- 5 year requirement + (5x annualised backlog/surplus): 3421
- 5 year requirement plus 20% buffer: 3472
- 5 year supply: 3472
- 5 year housing land supply: 11.51
Appendix 5: Rolling five year land supply position with an allowance for 40% of Woking’s residual unmet need

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