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GUILDFORD BOROUGH LOCAL PLAN

FURTHER COMMENTS on MAIN MODIFICATIONS

Implications of 2016 household projections for OAN and the plans housing requirement

Introduction.

We represent the landowners and proposed developers of land in Tangley Lane immediately to the north of the site allocation in Keens Lane. Since the June 2018 hearing, Keens Lane has received a formal planning consent and land at Tangley Place Farm has also received planning consent for conversion works which will lead to some 800 m2 of commercial development on two floors. The area has undergone a material change in planning terms.

The landowner and developer confirm that the site is ready for immediate development having all main services and suitable access readily available. This was all expressed in our earlier representation in October.

Matters and issues.

I. 2016 household projections.

In October 2018 MHCLG issued a technical consultation seeking to clarify the impact of the revised population figures. It decided that it would not change its aspirations for housing supply (Para 11).

Our view is the same. The historic under-delivery of housing (especially in Guildford Borough and its adjoining Councils,) has led to a position where public policy should support delivery in excess of household projections (Para 11,2).

Guildford area, perhaps in a way greater than any other area in the country outside London, suffers from all the recognised issues of low supply (increased demand, declining affordability)

We agree with the Government's proposed approach described in Para 19 of the consultation. The GBC view is completely contrary to this expectation. The 2016-based projections do not qualify as an exceptional circumstance that justifies a departure from the standard methodology.

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2. GBC update: appropriate basis for calculating OAN.

Clearly not if one takes the view expressed in the MHCLG consultation.

3. Implications of GBC Note (33A)

The use of the 2016 based projections is not agreed. For the sake of this part of ID/I2 the provision of further sites should stand. It should not be forgotten that the main thrust behind the extra allocations within the MM was the provision of deliverable sites now.

The need for the additional MM sites.

There is clearly a need for the further allocations in the MM as invited by the Inspector. The Inspectors suggestion was that a further 550 houses should be allocated, capable of delivery in the first five years of the Plan. The detailed discussion around population projections is threatening to undermine this crucial element: that of 'deliverability'

*The Plan does not demonstrate clearly how it will seek to deliver housing **now**. There remains an over-reliance on large sites (mostly in the Green Belt and/or dependent on major road improvement works or in complex locations in the town centre). Moreover there is a distinct lack of the smaller and medium-sized sites that would be attractive to small local developers, like my company.*

ID/I2 does however remark that there will be no further discussion on the spatial strategy, indicating that these have been discussed already. This is not the case. The sites and the spatial strategy behind the MM site selection has not been aired in front of the Inspector and neither have they been subject to the same degree of public consultation as the other sites in the Plan.

These would not necessarily prevent the Plan moving forward if the Council could demonstrate that the MM sites clearly follow the same methodology and strategy of site selection as those already in the Plan.

They do not however.

The MM propose Tier 10 sites in the Green Belt villages before the suitable sites within the Urban Areas (Tier 8) and indeed Tier 1 (the Guildford urban area) have been exhausted.

This change in methodology has not been appropriately examined in front of the Inspector and, in our view, is fatal to the adoption of the Plan and will render the whole process open to legal challenge.

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4. Woking's OAN
5. Review mechanism

In our view, the Woking position is clearer than it was. Our detailed knowledge of the Woking local housing market leads us to conclude that there is no need to make any allowance for Woking's OAN and therefore a review mechanism is not needed at this stage.

Conclusion.

The OAN should remain at 630 but should exclude any need to include Woking thereby reducing the OAN to 588.

The reopened Hearing should allow for detailed assessment of the strategic approach adopted by the Council in their allocation of the MM sites. Whilst the OAN may be less there is still the requirement to allocate more land of varying sizes now. It is this aspect that the Inspector should be considering further.

*Richard Cooke
Director*

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