

Burpham Neighbourhood Forum

1 Bowers Cottages

Bowers Lane
Burpham
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Surrey
GU4 7ND

23rd January 2019

Re: Response of The Burpham Neighbourhood Forum to the request for submission
Local Plan 2017 Guildford Local Plan: Examination in Public (EIP) Resumed hearing
11th and 12th February 2019

Dear Sir.

Please find enclosed a copy of our representations.

We formerly request a position to speak at this hearing.

The enclosed submissions relate solely to the published questions of ID-12 Guildford
Resumed hearing matters. With appendices

If you have any queries regarding the enclosed submissions please contact me.

Yours sincerely

Jim Allen

Burpham Neighbourhood Forum Coordinator

Inspector's Matter and Issue 1:

'The appropriateness of using 2016-based household projections for the basis of Guildford's Local Plan.'

Burpham Neighbourhood Forum Response:

The Forum believes the latest available information should be used in all circumstances, particularly in regard to an assessment of housing need. In particular this is because past trends are not necessarily a guide to the future and events such as demographic change and changes in Britain's relationship with the EU are relevant considerations during the life of the Guildford Plan. The use of the 2016 data is consistent with the requirements of Paragraph 158 of the 2012 version of the Local Plan and also paragraph 31 of the 2018 NPPF which might apply in other circumstances.

Despite the plan being determined under the 2012 version of the NPPF there is corresponding requirement for the evidence base to rely on out of date evidence. The preparation and review of all policies should be underpinned by relevant and up-to-date evidence.

Inspector's Matter and Issue 2:

'Whether the calculation set out in the Council's paper "Update to OAN Assessment in Guildford as a result of the 2016-based Household Projections" (GBC-LPSS-033b) is an appropriate basis for calculating the OAN.'

Burpham Neighbourhood Forum Response:

The lack of affordability mentioned in Paragraph 4 of the paper referred to is a long term problem, which cannot be solved readily. There is no obvious evidence that historic suppression of young person households will end. Changes in the higher education market also call into question assumptions made about University of Surrey growth, particularly after the UK leaves the EU. It is unclear in the paper as to whether the statements made on both topics are little more than guesswork.

In summary, there is inadequate explanation within the paper for the upward corrections applied by GL Hearn, to limit the reduction in OAN made by the 2016 figures. Given the differences of opinion on this, under these circumstances the SHMA should be reviewed before any decision is made on the OAN figure for Guildford.

Inspector's Matter and Issue 3:

The implications of the Council's paper "GBC note on OAN following the 2016-based Household Projections" (GBC-LPSS-033a) for

A) the overall housing requirement set by the plan

B) the housing trajectory

C) the '5 year' housing land supply

D) the need for the additional sites included in the main modifications.

Burpham Neighbourhood Forum Response:

A) We welcome the acknowledgement by the Council that the 2016 data has a significant impact on Guildford's OAN. However. . .

B) The Council states it will not revisit the standard methodology. However, GL Hearn appear to be unilaterally seeking to make revisions to the new data in relation to younger households and university growth on the housing trajectory. This process requires further explanation. Given the significant changes to Guildford's OAN the only way to comprehensively reassess the data in a comprehensive manner is via the review of the SHMA.

C) In light of our wider concerns over the way in which the 2016 data is being unilaterally revised by GL Hearn, the 'five year' land supply demonstrated represents oversupply.

a. In recent days an announcement referring to North Street development has been made of substantially increased housing in the area affecting numbers required in the Green Belt.

D) The significant reduction of OAN warrants a more thorough examination of the relationship between OAN and the release of sites from the Green Belt. Since the Examination last met there have also been other significant changes, namely the scale and nature of future retail/town centre in Guildford. The Forum believes it is not possible to deal with such wide -ranging issues without a further and wider consideration of the draft Plan as a whole.

a. See above. Also what impact does the demise on retail have to jobs and the need for housing for workers, or don't they count as jobs with the Economic Assessment?

Inspector's Matter and Issue 4:

'Whether it is possible at this point in time to come to conclusions on the issue of Woking's OAN and any unmet need.'

Burpham Neighbourhood Forum Response:

The factors that result in changes to Guildford's OAN also apply to Woking. In light of changes to population projection that are occurring and have already occurred no conclusion can be drawn in relation to Woking and no provision should be made for Woking's housing need within the Guildford Local Plan under current circumstances. We note the correspondence from Guildford Borough Council to Woking Borough Council in October 2018 demonstrating differences in opinion on housing need. No sites in Guildford should be allocated on the basis of potential future need from Woking for the time being if at all and the calculation for Woking should be removed from Guildford's figure. We maintain the SHMA should be reopened to fully understand these issues.

Inspector's Matter and Issue 5:

'Whether in view of current uncertainties (especially with regard to item 4) it would be appropriate to insert a review mechanism into the plan and if so, how it would be phrased.'

Burpham Neighbourhood Forum Response:

The Neighbourhood Forum would formally object to having a review mechanism within the plan as this will mean any Green Belt lost through over estimation and void assumptions, giving numerical inaccuracies at this point in time, could not be regained as part of the review process.

The number should thus be accurate at this time. Should the wording of any review mechanism be deemed necessary it should allow for any review of the Guildford Local plan to be dependent upon key dates in formation of Woking's new plan, rather than an arbitrary period of time from the adoption of the Guildford plan.

Commentary on the actual numbers.

It is noted that the council has stated in its submission (GBC_LPSS_033b_GLH updated housing) that they assume a requirement of some 562 houses per annum.

While the highly knowledgeable and experienced Neil McDonald with his far more open an honest approach has arrived at a number of 361.

The Neighbourhood Forum born of simplicity of approach and practicality have done their own numerical assessment displayed in the Table below.

1. Column 2 is the expansion rate using the ONS pre -hearing home formation estimates,
2. Column 4 is that Chosen by the Inspector after deliberation while column five is that chosen by GBC.

3. In the Interim the Expert on the subject Lead Councillor for infrastructure (MF) made the statement in the press of the 'new formula' housing need assessment columns 7 & 8 – 57% represents the pre and post differences by that method.

4. The next column is the household build rate using the new ONS figures and the 383 represents the Guildford number reduced by that percentage,

5. the 112% represents over supply as required by the inspector during the hearing and

6. the final number is the number of completions required each year to meet that criteria which averages out at a modest 402. Surprisingly close to the 'correct number' of 361 but way below that calculated using the undisclosed formula of GL Hearn. We thus conclude the housing number proposed by GL Hearn is way out of line with need for the Borough and should be ignored. A Figure somewhere between 361 and 402 are the rational numbers to move forward with. Noting that the exceptional circumstances no longer exist to justify development on Green Belt site in Burpham at Gosden Hill.

