
Guildford Local Plan Examination

**Statement for the Resumed
Hearings**

Prepared by

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For

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1. Introduction and summary

Executive Summary

1.1 *Taylor Wimpey UK Ltd maintain their objections to the soundness of the Guildford Borough Local Plan for the following reasons:*

- *The Plan is **not positively prepared** having regard to the derivation of the OAN, the approach to housing needs and housing delivery generally.*
- *The Plan is **not justified** having regard to the spatial strategy and housing allocations, such that it cannot be said to provide the most appropriate strategy when considered against the reasonable alternatives.*
- *The Plan is **not effective** and will fail to provide a five year supply of deliverable housing land and/or deliver the requisite amount of housing during the plan period.*
- *The Plan is **not consistent with national policy** having regard to (i) the derivation of the housing requirement that is now being advanced (562dpa); and (ii) the spatial strategy having regard to the approach to site selection/allocation.*

1.2 *We acknowledge the parameters for the additional hearing sessions as set out in ID/12. As such, our comments address the key issue: the implications of the 2016 household projections for the Plan's housing requirement. Accordingly, and as directed in ID/12, we do not seek to expand upon the merits of the omission site at Flexford/Normandy (Site Ref: A46) as a housing allocation save to say that it remains available as a sustainable option in helping to meet the identified need for new homes, at a train station, in a location that can be enhanced through the provision of additional social and community infrastructure. The sustainability merits of this location have been acknowledged by the Council through their proposed allocation of adjacent land at Glaziers Lane under Policy A64 (MM45)).*

1.3 *As set out in our earlier Statements to the Examination, Taylor Wimpey UK Ltd continue to object to omission of the A46 site and consider that it should be re-allocated and included in as an additional or alternate allocation in a further round of Modifications. Such an amendment would assist in addressing the fundamental soundness of the Local Plan as drafted.*

1.4 *Where questions and/or parts of questions relate to the matter of the housing requirement responses have been provided by Turley. This builds upon the technical evidence submitted on behalf of Taylor Wimpey UK Ltd as part of representations to the Local Plan and within the Hearing Statement submitted in March 2018.*

The Housing Requirement Scenarios

- 1.5 *The Local Plan Examination has considered a range of differing approaches (and conclusions) in relation to the derivation of what might be considered to represent an NPPF-compliant OAN. This includes the 562dpa figure now being advanced by GBC (in place of the 663dpa figure included in Main Modification (“MM”) 2 (12,600/19yrs)).*
- 1.6 *For the reasons set out below, and in relation to our written submissions to the earlier examination sessions, we object to this figure as failing to provide for an NPPF-compliant level of growth.*
- 1.7 *A failure to take full account of the implications of the scale of difference in projected housing need resulting from the use of the 2016-based projections will present a real risk that the Plan on its adoption is instantly out-of-date in its application under the provisions of the 2018 NPPF.*
- 1.8 *A number of the requirement scenarios, including those advocated by GBC, may be summarised as follows:*
- **652dpa** (the submission version of the Local Plan)
 - **717dpa** (the figure advanced at the earlier hearing sessions by Turley obo Taylor Wimpey UK Ltd)
 - **663dpa** (the figure included in MM2 (630dpa 2015 to 2019 and 672dpa 2019 to 2034))
 - **562dpa** (the figure now advocated by GBC)
 - **752dpa** (derived from the Government’s ‘minimum’ local house need using the standard method on the 2014-based household projections).
- 1.9 *For the reasons set out, we are of the view that the Plan should provide for the 12,600 dwellings in MM1 as a minimum during the period 2015 to 2034 (av. 663dpa).*
- 1.10 *Our response to matters 1 to 5 as set out in ID/12 is set out below.*

2. Matters and Issues

Q1. The appropriateness of using 2016-based household projections for the basis of Guildford's Local Plan

Note The Government's recent consultation regarding the continued use of 2014-based household projections is directly solely at plans which use the standard method for calculating OAN and which are being examined under the 2018 NPPF. The consultation has not been directed at transitional plans like the Guildford Local Plan, which are being examined against the policies of the 2012 NPPF and are based on a different approach to OAN calculation. Paragraph 158 of the 2012 NPPF states that Local Plans should be based on adequate, up-to-date and relevant evidence; the 2016-based household projections constitute the most recent evidence.

- 2.1 The observations noted above as to the application of the 2016-based SNHP in accordance with the transitional arrangements are acknowledged.
- 2.2 In assessing the extent to which it is 'appropriate' to use the 2016-based household projections for the purpose of informing the housing requirement in the Guildford Local Plan, however, we are strongly of the view that the following points must be taken into consideration:
 - The 2012 NPPF and appropriate PPG do not suggest that the latest projections should be used uncritically. Our previous representations highlighted concerns in simply integrating the 2016-based SNPP without adequate consideration as to the factors which have shaped the downward trajectory of projected population growth, including the consequences of the local under-provision of housing, when compared directly to the preceding 2014-based SNPP. The Council has similarly approached the integration of the 2016-based SNHP without sufficient consideration as to their limitations in its latest presented calculations;
 - As the Council acknowledges in its hearing statement¹ the 2016-based household projections make a material difference to the calculation of Guildford's OAN as compared to the 2014-based projections. On the basis of the Council's evidence the implied starting projection falls from 557 to 313 homes per annum over the plan period. In the parlance of the appropriate PPG this represents a 'meaningful change' with the clear advice provided that in such instances there are circumstances where new projections should not be used or

¹ GBC-LPSS-036

there application in the presentation of an alternative calculation of need be fully justified²;

- Whilst the Government’s October 2018 paper remains a consultation document it clearly challenges the appropriateness of the 2016-based SNHP for the purposes of calculating housing need. It states that: *‘Although the Government generally recommends the use of the latest data in producing assessments of housing need, in this case there have been substantial changes in the method for producing the projections that have resulted in major changes’*³. This reflects both its own analysis as well as referenced limitations of the dataset by the organisation responsible for their preparation, the Office of National Statistics (ONS). The identified concerns are considered to carry greater weight in the context of the scale of change implied between the latest household projection and the earlier iteration as referenced within the preceding point; and
- The Government has through its own actions in engagement with the Examination of the Draft London Plan confirmed that it considers the recommendations within its consultation document to be of relevance to plans submitted during the transitional phase. In this regard it has expressed that its concerns regarding the appropriateness of using the 2016-based SNHP should be afforded proportionate weight. This is articulated within the Government’s written statement to the housing requirement matter, in which they make direct reference to the Technical Consultation of which they observe: *‘...is considered to provide relevant background to the level of weight that should be afforded to the revised household projections’*⁴.

2.3 In addition to these aspects, the technical implications of which are considered further in our response to Q2, it is considered that due consideration needs to be given to the Government’s clearly stated objective to ensure that up-to-date Local Plans collectively contribute towards the aspirational target of delivering 300,000 homes per annum by the mid-2020s. This target remains a key priority of the Government and forms a key component of its response to the acknowledged national ‘housing crisis’. The Government is clear to identify that this crisis has arisen from a sustained failure to provide the level of homes needed across the country and in particular in areas such as Guildford where the evidence confirms, in the form of unsustainable and rising affordability issues, the acute adverse consequences of this failing.

² PPG Reference ID: 2a-016-20150227

³ MHCLG, ‘Technical consultation on updates to national planning policy and guidance’, October 2018, paragraph 27(2)

⁴ https://www.london.gov.uk/sites/default/files/m17_mhclg_2631.pdf (December 2018)

- 2.4 The progression of the Guildford Draft Plan with a housing requirement which appears significantly short of the Government’s considered ‘minimum’ local housing need, some 752 homes per annum⁵, on the basis of the Council’s attempt to integrate the 2016-based SNHP presents a retrograde step in positively contributing towards achieving the Government’s ambition. This must also be seen in the context of:
- A recognition that even with the integration of the 2014-based SNHP at a national level the calculated need following the standard method falls some 31,000 homes short of achieving the 300,000 homes per annum target⁶;
 - There is therefore an expectation that providing for the full need will require more ambitious planning authorities to plan for housing provision above the ‘minimum’ calculated housing need. An even greater level of positive compensation from such areas would be required where authorities advance plans which provide for significantly less than the ‘minimum need’; and
 - The Government’s clear position as to the principles it will apply going forward in achieving the target and it is assumed in any subsequent amendments to the standard method calculation. Specifically the consultation sets these out as:
 - *‘providing stability and certainty for local planning authorities and communities;*
 - *ensuring that planning responds not only to movements in projected households but also to price signals; and*
 - *ensuring planning policy supports a housing market that works for everyone.*⁷
- 2.5 The Council’s proposed use of the 2016-based SNHP to calculate the housing need for Guildford in order to attempt to lower the Draft Plan’s housing requirement would mean that the authority was directly at odds with the Government’s objective of ensuring that the process of plan-making serves to contribute towards boosting the supply housing. It would also fail to respond positively to the principles set out by the Government through its consultation and listed above, as it would;
- Result in the Council being required to undertake an early review acknowledging the scale of difference in the scale of housing need planned for. This would result in a further continuation of uncertainty in planning for housing in the borough and be likely to provide a mis-representative picture to local communities as to the scale of housing land supply which would need to be

⁵ Note: This is based on the application of the Government’s technical consultation proposal and therefore integrates the 2014 SNHP projection of household growth (calculated 2018 – 2028).

⁶ The MHCLG October 2018 Technical Consultation confirms that the application of its proposed methodology would result in a calculated national need annually for 269,000 homes.

⁷ *Ibid*, paragraph 18

released in the near future. This recognises that under the 2018 NPPF / PPG the Council would be required to undertake a review of the Plan providing for a level of housing need which represents a significant ‘step-up’ from that proposed by the Council in the Draft Plan based upon the application of the methodology within the Government’s consultation document;

- Fail to respond adequately to evidence of acute price signals and affordability issues best illustrated by the borough’s affordability ratio which stands at 12.53 (2017). This ranks Guildford as one of the least affordable authorities nationally⁸; and
- Result in a level of housing delivery which would demonstrably fail to address the most acute consequences of worsening affordability as illustrated by a significant need for affordable housing in the borough. A point which was acknowledged through the previous hearing sessions where the Council indicated that a minimum of 195 affordable homes was needed each year to address the most acute needs.

2.6 Collectively these factors confirm strongly that it is not appropriate to use the 2016-based SNHP for the basis of Guildford’s Local Plan.

Q2. 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.

2.7 We are strongly of the view in the context of our answer to Q1 that the Updated OAN presented in GBC-LPSS-033b cannot be viewed as an appropriate basis for advancing a lower OAN for Guildford as purported by the Council.

2.8 As our answer to Q1 shows to adopt such an approach would conflict directly with the Government’s own view as to the appropriateness of the 2016-SNHP in forming the ‘starting point’ for calculating housing need.

2.9 Furthermore in specifically considering the analysis presented in GBC-LPSS-033b it is noted that GL Hearn themselves have questioned the validity of the methodology used by the ONS in the 2016-based SNHP. Indeed GL Hearn summarise proficiently the issue with the dataset confirming that the new methodology adopted by the ONS means that the ‘*household projections effectively locked in this lack of affordability*’⁹. In this it is of note that the Council’s paper was prepared in advance of the Government’s

⁸ Our previous hearing statement noted that only 26 authorities outside of London had a worse relationship between median house prices and earnings than Guildford in 2017, placing the borough amongst the 10% least affordable authorities outside the capital.

⁹ GBC-LPSS-033b, paragraph 4

technical consultation and this view has therefore been arrived at independent of the Government conclusion.

- 2.10 Whilst in the paper GL Hearn seek to apply a series of adjustments to the household formation rates within the 2016-based SNHP, as was applied in the preceding SHMA analysis, these variations are, however, still affected by the fundamental methodological change in the official dataset and are therefore still subject to the same criticism of the underpinning dataset.
- 2.11 The scale of change in the projected need arising from the use of the 2016-based SNHP in place of the 2014-based SNHP dataset even where adjustments have been applied illustrated the extent of the issue and limitations of its application in the context of the Government’s concerns set out in our response to Q1. Table 2.1 demonstrates this by comparing the implied scale of projected housing growth under the variant outputs presented for the scenario assuming an economic-led housing need figure. It is important to note in this regard that the only factor driving the different levels of need between the scenarios presented in Table 2.1 is the input of the assumptions around household formation within the 2016-based SNHP compared to the 2014-based dataset.

Table 2.1: Impact of the application of the 2016-based SNHP on the Council’s calculation of need under the Economic-led housing need scenario

		Homes needed per annum			
		2014-based		2016-SNHP	
Household formation rate assumption		SNHP return	25-34 2016 SNHP	25-34 return	2016-SNHP 25-44 return
Economic-led housing need		606	450	515	539
% difference			-26%	-15%	-11%

Source: Figures taken from GBC-LPSS-SoCG-009 and GBC-LPSS-033b

- 2.12 Even with the proposed adjustment which assumes a return of household formation rates of those aged 25-44 the scale of the reduction in resulting housing need implied within GBC-LPSS-033b at some 11% lower is not adequately justified in the face of contrasting evidence of worsening affordability and housing need pressures in Guildford. As set out within the technical evidence supporting our previous hearing statement¹⁰ these are evidenced by a number of clear indicators:

¹⁰ We set these out at Appendix A to our previous hearing statement (March 2018).

- An individual with median earnings in Guildford would have been required to spend 12.5 years' earnings to purchase at the median house price in 2017, with this ratio having increased by almost one third (31%) since 2012 and rising notably since the start of the plan period¹¹ (11.2);
- The median price paid for housing in Guildford has increased by 41% over the five years to September 2017, far surpassing the 27% growth seen nationally over the same period¹²; and
- More broadly, Guildford is located in a wider area characterised by affordability issues. Median house prices in Surrey were some 87% higher than the national average over the year to September 2017, housing in the county is less affordable than any other county in England relative to median earnings¹³ (12.9).

2.13 The proposition that need has reduced in this context as a result of the 2016-SNHP is not credible or substantiated where the limitations of the official dataset leading to the changes are acknowledged by both the authors, the ONS and the Government. It cannot therefore be that it is appropriate to place any weight on the calculations set out within the note and the alternative projections presented should be disregarded for the purposes of arriving at an appropriate calculation of housing need to inform the housing requirement.

2.14 It is also considered of paramount importance that in arriving at any subsequent judgement as to the appropriate concluded OAN that no attempt is made to reference back any subsequent scales of adjustment from the 2016-based SNHP. This recognises that it should not be viewed as representing an appropriate up-to-date 'starting point' in place of the 2014-based SNHP.

2.15 This is of direct importance in the context of arriving at judgements with regards to the scale of appropriate market signals adjustment, recognising that this must be applied to an appropriate projection of household growth. The suggestion in the Council's paper GBC-LPSS-033a that that the updated 'OAN' in GBC-LPSS-033b is some 80% above the demographic starting point is therefore strongly refuted.

2.16 The same issues are pertinent to the updated calculations presented with regards to Woking's housing needs and its implications for provision for unmet housing needs in Guildford. In this instance this is reinforced by the fact that the Woking Review of the Core Strategy will be undertaken under the 2018 NPPF and will need to take full account of any future changes implemented within the PPG to the standard method calculation. In accordance with our answer to Q1 the MHCLG technical consultation's

¹¹ ONS (2018) Housing affordability in England and Wales, 2017. Ratio of median house price to median gross annual workplace-based earnings

¹² ONS (2018) Median house prices for administrative geographies: HPSSA dataset 9

¹³ ONS (2018) Housing affordability in England and Wales, 2017. Ratio of median house price to median gross annual workplace-based earnings

proposed principles to be applied in the establishment of an appropriate methodology strongly indicate that any impact of changes to the calculation in an authority such as Guildford or Woking where affordability issues are also acute would be more likely to be upwards rather than downwards. We expand further on our views on the issue of unmet need arising from Woking within our answer to Q4.

Q3. The implications of the Council’s paper “GBC note on OAN following the 2016-based Household Projections” (GBC-LPSS-033a) for:

- the overall housing requirement set by the plan

- 2.17 With reference to our responses to Questions 1 and 2 it is our view that any inference from the Council’s paper that the need for housing in Guildford has reduced as a result of the release of the 2016-based SNHP is not appropriate or justified.
- 2.18 In contrast the Government has been clear in the publication of its October 2018 Technical Consultation and subsequent submission to the Draft London Plan that it does not see the scale of the need for housing having fallen as a result, as it stresses, of ‘methodological changes’¹⁴ inherent in this dataset.
- 2.19 In recognising the importance of the Draft Plan in providing stability and certainty as to the scale of housing to be provided for, and the consequences for the allocation of housing land, it is strongly considered that due weight be given to the Government’s latest consultation proposals as to the updating of the NPPF / PPG.
- 2.20 This would suggest that any attempt to arrive at an updated housing requirement for Guildford would need to take full account of the 2014-based SNHP, recognising the Government’s view that these continue to form the appropriate starting point for assessing housing needs. This would align with the position taken within our examination statement dated May 2018 (Representor ID 11189889). Appendix A of this statement set out a recommended calculation of the OAN of Guildford which established a need for 717 homes per annum. This scale of need was based on a considered application of the 2014-based SNHP and with direct reference to the Council’s previously published evidence base documents used to inform the preparation of the Draft Plan.
- 2.21 It is of note that this scale of calculated need aligns much more closely with the scale of need implied by the application of the Government’s technical consultation document, which as referenced earlier would result in a calculated need of 752 homes per annum.

¹⁴ MHCLG, ‘Technical consultation on updates to national planning policy and guidance’, October 2018, paragraph 11

- 2.22 A failure to take full account of the implications of the scale of difference in projected housing need resulting from the use of the 2016-based projections uncritically will present a real risk that the Plan on its adoption is instantly out-of-date in its application under the 2018 NPPF. This will undoubtedly lead to a continued environment of challenge as to the extent to which the Plan is consistent with paragraph 60 of the NPPF leading to the likely application of paragraph 11. This would serve to severely undermine public confidence in the process of plan-making which is not in the interest of anyone in supporting the delivery of much needed homes in the borough.
- 2.23 The implications arising from the content of GBC-LPSS-033a are clear. They would result in a substantial reduction in the overall housing requirement to be met during the plan period when assessed against the alternative requirements advanced as part of the Examination process.
- 2.24 The various scenarios result in the following housing requirements in Table 2.2 below.

Table 2.2 *Housing Requirement Scenarios*

Methodology for Housing Requirement	Annualised Requirement	Total Requirement 2015 to 2034
Submission version Local Plan	652dpa	12,400
Turley obo Taylor Wimpey UK Ltd	717dpa	13,600
MM2	663dpa	12,600
GBC 2016-based	562dpa	10,678
2014-based standard method	752dpa	14,288

- 2.25 Evident from the above is the 562dpa figure now advocated by GBC is substantially below the alternative figures. Including for the reasons set in this Statement, the 562dpa figure cannot be relied upon as representing an appropriate NPPF-compliant requirement figure.

- the housing trajectory 5 year housing land supply

- 2.26 The implication arising from GBC-LPSS-033a (in setting a housing target at 562dpa) is clear. It would serve to substantially reduce the annualised housing requirement. When combined with the application of the residual approach to meeting the substantial shortfall that has accrued from the start date of the Plan (despite the application of a 20% buffer) this would further frustrate attempts to address key factors affecting worsening affordability, and would be contrary to Government policy which is seeking to boost the supply of housing (ID/6 (para 14)).
- 2.27 We have assessed the implications for the five year housing land supply position using the supply figures from Appendices 3, 4 and 5 in GBC-LPAA-033a. This shows a projected supply of 4,469 dwellings for the five year period 2019 to 2024.

- 2.28 This supply figure is 505 dwellings less than that presented in the housing trajectory within the Main Modifications consultation document.
- 2.29 The 505 dwelling difference is the sum of the deletion of the 4 no. sites suggested to be removed from the Green Belt in the Main Modifications (see also GBC-LPAA-033a (para 20)); which approach is no longer supported by the Council on account of their recalibration (reduction) of the housing requirement.
- 2.30 Using GBC’s supply figures from GBC-LPSS-033a, the 5yr housing land supply scenarios at the 2019 base date are as set out in Table 2.3 below¹⁵:

Table 2.3 Five Year Housing Land Supply Scenarios

	GBC based 2016- @ 562dpa	MM2 (12,600 for plan period)	717 Turley obo Taylor Wimpey UK Ltd
Requirement 2015 to 2019	2,248	2,520	2,868
Completions 2015 to 2019	1,264	1,264	1,264
Shortfall 2015 to 2019	-984*	-1,256**	-1,604***
5yr Requirement 2019 to 2024	2,810 (562 x 5yrs)	3,360 (672 x 5yrs)	3,585 (717 x 5yrs)
+ shortfall	+330 (66dpa x 5yrs)	+420 (84dpa x 5yrs)	+535 (107dpa x 5yrs)
Sub Total	3,140	3,780	4,120
+20% buffer	+628	+756	+824
Total 5yr Req. 2019 to 2024	3,768	4,536	4,944
GBC Supply	4,469	4,974	4,974
GBC Yrs Supply	5.9yrs	5.48yrs	5.02yrs
GBC Surplus/Shortfall	+701	+438	+30

*984 dwellings to be met in remaining 15 years of the plan period (2019 to 2034) = 66dpa

**1,256 dwellings to be met in remaining 15 years of the plan period (2019 to 2034) = 84dpa

***1,604 dwellings to be met in remaining 15 years of the plan period (2019 to 2034) = 107dpa

¹⁵ Use of the 717dpa Turley figure is for benchmarking purposes only as it is broadly mid-point between the figures in MM2 (663dpa) and that which would be derived from the standard method on the basis of the 2014-based household projections (752dpa).

- 2.31 The above table applies the supply figures for the 562dpa assessment form GBC-LPSS-033a. The ‘other’ requirement scenarios apply the supply figures from the main Modifications.
- 2.32 In addition, it also represents the Council’s best-case scenario in so far as the trajectory assumes housing delivery is achieved in 2020/21 from sites upon which development is only permissible once they have been removed from the Green Belt. Taking account of the refined definition of a deliverable site in the revised NPPF, it is not considered that clear evidence has been supplied to demonstrate that these can be completed to provide the scale of completions envisaged i.e. at Aaron’s Hill, Godalming.
- 2.33 Moreover, if delivery of the sites currently in the Green Belt is delayed until 2020/21, approx. 260 units will be removed from the 5 year supply.
- 2.34 The supply figure will be further reduced if delivery envisaged from the Gosden Hill and Blackwell Farm sites in Guildford (policies A25 and A26) does not reflect expectations, particularly having regard to the scale of infrastructure improvements required and the need to limit impacts upon the A3 until wider enhancements are delivered, as detailed in our original representations and discussed at the examination hearings. This would remove a further 300 dwellings from the supply side. A further 150 dwellings could also be ‘lost’ through delays at Wisley.
- 2.35 On the basis of our analysis, there are sufficient doubts about the delivery of at least circa 950 dwellings which would result in a shortfall in the five year housing land supply position under any of the aforementioned scenarios. This results in a Plan which is unsound for the purposes of both the 2012 and 2018 NPPFs.

- the need for the additional sites included in the main modifications

- 2.36 As detailed in our original representations, part of the necessary solution is to identify sites that can provide material boosts to the overall deliverable supply within the immediate five year period, thereby reflecting the refined definition of such sites in the revised NPPF. Presently the plan is overly reliant upon sites that have significant lag times associated with them. Our client’s proposal would enable two or more sales outlets to be established at the Normandy/Flexford (Policy A46) site with completions at approximately 60+dpa per outlet. If one were to apply a base date of 2019 (the anticipated adoption of the Plan), a minimum of 200+ dwellings could be delivered at the Normandy/Flexford site within the 5 year period to 2024. Such deliverability is achievable in part due to the site’s greenfield nature and the fact that it is controlled by an established national housebuilder.
- 2.37 Including on the basis of GBC’s SA to the Local Plan, the omission site controlled by Taylor Wimpey is inherently preferable as an allocation than can be said to be the case with the additional sites put forward in MM2 and now proposed to be deleted pursuant to the content at GBC-LPSS-036 (para 20 refers).

Q4. Whether it is possible at this point in time to come to conclusions on the issue of Woking's OAN and any unmet need.

- 2.38 It is considered that the approach reflected in ID-006 remains a pragmatic and reasonable solution to addressing clear evidence of uncertainties in the calculation of Woking's needs as part of its own Review of its Core Strategy outside of and independent to this examination.
- 2.39 As set out in ID-006 it is agreed that it is not within the scope of the examination of the Guildford Local Plan to seek to arrive at a new OAN for Woking. Any such exercise would need to be undertaken by the Council in recognition of the 2018 NPPF / PPG. This requires acknowledgement that any calculation of need based on the standard method should be viewed as a 'minimum' need and should not be considered to represent the housing requirement which will be set out through emerging policy.
- 2.40 The establishment of the housing requirement will need to take into account those factors identified in the PPG which could suggest that a higher level of need be planned for¹⁶ as well as factors which may constrain the level of housing which could be provided.¹⁷
- 2.41 The evidence on these matters would need to be subject to an examination of its application in policy and an attempt should not be made at this stage to pre-empt the outcomes of this process.
- 2.42 Whilst recognising the importance of viewing Woking's Review of its Core Strategy as an on-going and independent process it is on the basis of current published evidence and emerging policy reasonable to conclude that there remains an unmet need which exists now and must be addressed. By way of illustration where the standard need method (following the Government's consultation approach) is applied, Woking has a need for 431 homes per annum. The latest Site Allocations DPD published by the Council confirms that it is not intending to provide for more than 292 homes per annum as a result of its assessment of constraints. This leaves a residual unmet need of some 139 dwellings, of which 83 are accommodated within the Waverley Local Plan. The result is an unmet need of over 50 homes per annum within the HMA which would need to be reconciled in the context of the different plan periods over which unmet needs are being met. This would continue to require a degree of judgement.

¹⁶ PPG Reference ID: 2a-010-20180913

¹⁷ PPG Reference ID: 2a-011-20180913

- 2.43 In this context, and with reference to our answers to the preceding questions in this statement, it is considered that as set out in ID-006 that it remains true that: *‘...the evidence of Woking Borough Council clearly indicates that there is an existing level of unmet need and that this is likely to persist into the future’¹⁸.*
- 2.44 A positive response to accommodating this need in some form must be reflected in the housing requirement in the Guildford Local Plan and its planned provision for housing. Where a change of position results from the examination and adoption of the Woking Plan in the future the consequence for Guildford could be addressed through a future review but a positive stance must be taken at this point in time. A failure to do so would result in the needs of households currently requiring housing remaining unmet.

Q5. 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.

- 2.45 We remain of the view that it is important to retain a review mechanism within the Plan, not least to ensure delivery of the required level of new homes. The housing crises in Guildford (GBC-LPSS-034 refers), which is in a part a result of the failure to deliver sufficient homes over a sustained period, including from the 2015 base-date of the Local Plan and hence the application of a 20% buffer, means that there has been a history of under delivery of housing within the Borough.
- 2.46 The tightly constrained Green Belt boundaries means that there is little if any flexibility to address any shortfall in housing delivery, including on account of delays in the provision of upgrades to the A3 meaning delays to the strategic allocations along the A3 corridor. This is a real threat to meeting the economic, social and environmental objectives of the Local Plan. As such, there is a substantiated need to include a review mechanism in the Local Plan.
- 2.47 In relation to preparation of the Local Plan, which is being examined in the basis of the 2012 NPPF (as is the case here with the GBC Local Plan), the MHCLG, in their written representations statement to the London Plan Examination (Jan 2018) (see footnote 4 on page 4 above), which is also being examined against the provisions of the 2012 NPPF made clear their approach to assessing and providing for the appropriate level of housing growth, stating:

“Therefore, once the London Plan has been finalised and published, if the housing requirement set out is significantly lower than that derived from the standard methodology in the 2018 NPPF, then the Mayor would be required to work towards an early review of the London Plan to address this.”

¹⁸ ID-006, paragraph 11

- 2.48 These conclusions equally apply in the context of plan making in GBC; which would need to be addressed through an appropriately worded policy setting out a mechanism for an early review.

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