Guildford Borough Local Plan: strategy and sites: Examination

Hearing 12 and 13 February 2019

Inspector’s Note accompanying the Hearing Agenda

Please read this note carefully

I should like to thank all those who have produced statements for the resumed hearing. I raised 5 issues in my note of 20 December 2018 and have received a variety of comments.

What the hearing will not cover

In the hearing we will not be covering subjects that were addressed in earlier hearings. This will not be an opportunity to re-open discussion about, for example, student migration, job growth and economic activity rates, Green Belt, Guildford town centre, infrastructure or the merits of allocated sites. These, and many other subjects, have already been explored at considerable length in previous hearings. I have listened carefully to all the arguments on these topics and have read all the submitted material. Equally, this is not an opportunity to press for a higher housing requirement or promote any particular site, or to expand upon the issues raised in your representations on the main modifications, or to comment on other people’s representations.

The scope of the hearing

The sole purpose of the hearing will be to look at whether the publication of the 2016-based household projections should or should not effect a change to the OAN and/or the housing requirement (note, these are not the same thing) which were set out in the main modifications published and consulted upon by the Council towards the end of last year. This will be a largely technical discussion and I will only welcome focused, meaningful contributions which will help me reach a conclusion on the issue. More general comments, for example the effect of the housing requirement on Green Belt or infrastructure, will not be appropriate since those matters were the subject of previous hearings.

In considering this issue, there are just 5 questions and the hearing will only deal with these.

The first question is whether the most recent household formation rates justify a change to the OAN set out in the main modifications.
The housing figure in the main modifications was based on 2016 population projections to which 2014 based household formation rates were applied; these latter were based on a time series going back to 1971. In contrast, the 2016-based projections for household formation rates use only the two reference points of 2001 and 2011. It would appear that this is the main (only?) cause of change between the demographic OAN figure in the main modifications and the figure now being put forward by the Council’s consultants.

It has been argued that the household formation rates used in the 2016-based projections are unduly suppressed by the factors prevalent during the short time period on which they are based: deteriorating affordability, low housing delivery, and recession for part of the period. On that basis it is argued that the use of these projections would simply perpetuate affordability problems and low levels of housing delivery, contrary to Government policy. The Government’s consultation in relation to the standard method makes reference to this issue. On the other hand I have read arguments that they more closely reflect other sources such as the Labour Force Survey.

The second question is whether the Council’s approach, which makes an adjustment to household formation rates in the 25-44 age groups, is an appropriate compensation for the factors referred to above.

The third question is, if it were considered that a reduction in the OAN compared with the figure in the main modifications was sound, whether the housing requirement in the main modifications should be maintained on the basis of other factors; for example, the desirability of meeting affordable housing need as far as possible, and the need for a housing trajectory that ensures improved levels of housing delivery in the earlier years of the plan.

The fourth question, in respect of Woking, is whether there is any justification for departing from the figure in the main modifications given that it is based on a full SHMA, whereas the formula-based putative OAN referred to by Woking and Guildford Councils is only a starting point; other housing market factors have not been applied; the figures have not been subject to examination; and the outcome of the Government’s consultation on the use of the household projections is not yet known.

The fifth and final question is, solely on the basis of the housing requirement, and only if a lower housing requirement is appropriate for soundness reasons, whether the additional housing sites
allocated in the main modifications should be retained or whether all or any should not proceed.

The discussion will be confined strictly to these questions.

Jonathan Bore
INSPECTOR

31 January 2019
Guildford Borough Local Plan Examination

Hearing 12 and 13 February 2019

Please read the accompanying note carefully

AGENDA

12 February

Opening and appearances

1. Whether the most recent household formation rates underlying the 2016-based household projections justify a change to the objectively assessed housing need set out in the main modifications.

2. Whether the Council’s adjustment to household formation rates in the 25-44 age groups is an appropriate compensation for household suppression factors.

3. Whether the housing requirement in the main modifications should be maintained on the basis of other factors such as affordability and early years delivery.

12 or 13 February depending on progress

4. Whether there is any soundness reason for departing from the allowance made for Woking’s unmet need in the main modifications.

5. (Only if it is concluded that the housing requirement should be reduced for soundness reasons): Whether the additional housing sites allocated in the main modifications should be retained or whether all or any should not proceed (on the basis solely of the 2016 household projections: other factors will not be discussed).

6. Conclusions