

Guildford Greenbelt Group (GGG)
Press announcement 13 January 2015
Embargoed until Friday 16 January 2015

GUILDFORD GREENBELT GROUP (GGG)
RESPONDS TO CALL RE SHORTFALL

GGG responds to Guildford Borough Council's press release asking for the "housing shortfall" to be spread over more than 5 years.

GGG would like to admit we are puzzled by Cllr Mansbridge's letter to the Rt Hon Eric Pickles, Secretary of State for Communities and Local Government. Without disrespect, the announcement seems to suggest that the council is a little muddled.

We are not sure that we accept that the *timing* of the housing *shortfall* is of fundamental significance. Until last summer there was no shortfall in the housing need. The latest draft SHMA now shows a small total shortfall of 161 homes over the period 2001-13, although we have not yet reviewed this calculation.

The GBC press announcement appears to discuss how that shortfall will be allocated.

We'd like to note that there are two different and accepted mechanisms for dealing with shortfalls in the context of a local plan, both of which are acceptable to inspectors, one of which is the "Liverpool method" and one of which is the "Sedgefield method". One requires the shortfall to be added to the immediate 5 year supply requirement; the other permits the shortfall to be spread over the life of the plan. Both have been judged acceptable in the past by different inspectors. In other words, there is nothing exceptional about spreading any backlog or housing shortfall over the life of the plan, and this is not necessarily a matter on which it is necessary to consult the Secretary of State,

Is this muddle – or is this just spin to suggest that the council are protecting our countryside, when it isn't actually proposing to change anything?

If we are charitable, perhaps Cllr Mansbridge indeed meant to echo our call for a revision to the NPPF. Perhaps he is in fact seeking to question the requirement to demonstrate, within the local plan, a five year *supply*? This is one of the issues which we have raised before. If so, perhaps the question should be carefully rephrased.

The National Planning Policy Framework (NPPF 47) states that local authorities should "**identify and update annually a supply of specific deliverable sites sufficient**

to provide five years worth of housing against their housing requirements with an additional buffer of 5%. Where there has been a record of persistent underdelivery of housing [**not** the case in Guildford] local planning authorities should increase the buffer to 20%.”

So if Cllr Mansbridge wishes to get approval for considering supply on a deferred basis on the basis of Guildford’s special circumstances, we think that the letter to Eric Pickles will need to be redrafted to explain that it is the ***requirement to provide a five year supply***, rather than just the ***shortfall***, which should be spread over the life of the plan- in other words, Cllr Mansbridge may wish to gain a waiver from the requirements of NPPF 47. We presume that if the letter is revised the revised letter will also be announced. It may be helpful to see the actual text of the letter to Eric Pickles.

We do however warmly welcome the comment that the council is adopting a policy approach which “*will exclude all development in the Greenbelt unless it can be demonstrated that... constraints... can be overcome*”.

We are not sure that this is saying the same thing as the following sentence, however, which states “*We are now undertaking a rigorous reassessment of the potential adverse impacts on each site to assess where these impacts will significantly and demonstrably outweigh the benefits of meeting housing need*”. This seems to be in contradiction to the sentence which precedes it. In fact, as stated in the preceding sentence, and as a matter of case law, there should be a presumption against any Greenbelt site, unless there are exceptional circumstances which apply. We think that there is a contradiction between these two sentences. Is there some more muddle here on the part of GBC?

Susan Parker, leader of Guildford Greenbelt Group, commented:

“It is disconcerting and more than a little worrying that there seems to be some confusion among our councillors and the appointed officers.

“We are wary of announcements on housing numbers and issues affecting the Greenbelt from Guildford Borough Council given their historic failure to adhere to promises and commitments. In 2011 Guildford Tories promised unequivocally to protect the Greenbelt in their election manifesto but they subsequently proposed a Local Plan which involved very substantial Greenbelt development. The Council has also refused – despite freedom of information requests – to release the formulae and calculations used by GL Hearn (the consultants who worked on the SHMA) in determining the Borough’s housing needs for the Local Plan, and have not permitted consultation despite indicating that this current SHMA would be subject to

consultation. We do not see the need for such behaviour, and question whether the current Council can be relied upon to deliver what they promise?

“Nonetheless, we welcome this announcement of a change in policy and do hope it will be implemented.

“We therefore expect that the current proposals which have been submitted in relation to Effingham and to the Wisley Airfield site, and the Mastervision in relation to the Hog’s Back, will now be formally rejected by the Council, following their announced policy that all development will be excluded in the Greenbelt. Anything else will demonstrate that this press announcement is just spin.”

Enquiries:

Susan Parker 01483 203167

Notes for editors

1. Further information on GGG is available on the GGG website
<http://guildfordgreenbeltgroup.co.uk>
Or on its facebook page:
<https://www.facebook.com/Guildfordgreenbelt>
2. GGG public meeting open to all members of the public, will be held as follows:
 - 28 January 2015 -Fairlands Community Hall -7pm
3. A copy of the referendum petition supported by GGG is attached to this press release.
4. See the GL Hearn website:

<http://www.glhearn.com/developer/Pages/Overview.aspx> “We act for many of the leading developers and are currently advising on schemes totalling over 3m sq ft. We have a team of over 100 people directly involved in the development sector.”

<http://www.glhearn.com/developer/services/Pages/PlanningDevelopment.aspx> “The practice has in-depth experience of development projects.. this wide-ranging commercial track record is of great benefit for developer clients... We take pride in our ability to drive development projects through to delivery and problem solving with a commercial focus.”

<http://www.glhearn.com/services/planning/Pages/Overview.aspx> “With a client base that includes landowners, developers, investors, Regional Development Agencies and Local Authorities, we approach each project first by fully understanding and then striving to achieve our clients’ objectives. “

<http://www.glhearn.com/publicsector/Pages/Overview.aspx> “G L Hearn is increasing its work with the public sector providing a consultancy approach with a strong commercial aspect.”

<http://www.glhearn.com/services/planning/Pages/Residential.aspx> “We have a proven track record in the delivery of housing ranging from small residential schemes to larger, complex mixed-use developments, and the longer-term promotion of strategic sites. We provide comprehensive advice on residential strategy, from site identification through to the delivery of planning permission.”

<http://www.glhearn.com/services/planning/Pages/DevelopmentAdvice.aspx> “Good development advice requires solid planning and development expertise, together with specialist knowledge across the full range of property sectors. We have the in-house expertise to assess development potential and obtain the required permissions”.

<http://www.glhearn.com/services/planning/Pages/ApplicationsandS106Negotiations.aspx>

“Our expertise and experience in preparing outline and detailed planning applications and **our skill and determination in negotiations have secured consent for proposals in all sectors of the development industry. This is often the case where success may have seemed improbable before our involvement.** Undertaking S106 negotiations and the provision of viability advice in connection with them, which has become significantly important to secure such consents, regularly feature in this work... Our clients include some of the largest and most active developers in the UK.”