



Key Local Groups Combine on New Homes Target for Guildford

For Immediate Release: Wednesday 7 May 2014

Eight key local groups have come together to agree a target new homes figure of 300-345 per year for the life of the new Guildford Local Plan. The groups are The Guildford Society, Guildford Vision Group, Guildford Residents' Association, East Guildford Residents' Association, Save Hogs Back, Guildford Greenbelt Group and CPRE Surrey.

Publication of the first consultation Draft of the Local Plan is expected today. Once approved, the Plan will shape the future development of the borough and determine the new annual housing target for the next 20 years.

The arguments used by the group to arrive at a proposed 300-345 housing target for the Local Plan are based on the rationale of the National Planning Policy Framework & Practice Guidance. Please see attached reasoning.

The groups all agree it is important to take account of Guildford's unique combination of characteristics to ensure the evidence properly assesses housing need for the Borough.

- Guildford is a highly interconnected town which is not only influenced by London but also has its own high value economy and a student population.
- Guildford is also a special case due to its topography as a gap town complete with converging road, rail and river routes, the surrounding Green Belt and the plethora of special designations such as 'Area of Outstanding Natural Beauty' and 'Special Protection Area'.

Says Bill Stokoe, chair of The Guildford Society: "The group considers that, although it would be challenging to identify sufficient land to accommodate 300-345 homes a year, a target in this range would allow us to meet the social and economic obligations of the Borough without harming the value of our countryside and built environment. Debate could focus how to accommodate new development with minimal harm to character and how to open up opportunities for positive change."

Ends



Housing Provision in Guildford Borough

The Guildford Society, Guildford Vision Group, East Guildford Residents' Association, Guildford Residents' Association, Guildford Green Belt Group, Save Hogs Back and CPRE Surrey all agree that a housing target in the region of 300-345 homes a year is the maximum appropriate for Guildford. This is based on an assessment that the Strategic Housing Market Assessment (SHMA) figure should be in the order of 450 a year and that once constraints are taken into account, an annual figure of 300-345, although hard to deliver within the constraints, could be achieved over the life of the plan until 2031.

Housing Need Assessment

All groups have previously submitted reasoned responses on housing need. We consider that once the inflationary distortions have been removed from the draft SHMA, the figure should be in the order of 450. Corrections required include basing general forward projections on a more representative historical 10 year period, projecting realistic student growth not based on a one off increase, disaggregating the student population from forward housing demand and from net international migration, reflecting increased birth rate in household size, and removal of the biased, one way application of the duty to cooperate.

Demographic/ Migration Drivers

Guildford Borough Council's report "How Many New Homes" identifies that "*International migration is estimated to have had the most significant impact upon population in recent years*". Edge Analytics (July 2013 report) advise that "*Adopting long term growth assumptions for Guildford Borough based on uncertain estimates of international migration is not recommended, particularly given the evidence suggested by the 10 year migration history, with a lower annual net impact evident.*"

The Guildford Society has carried out a high-level analysis of the Communities and Local Government/ Office for National Statistics (ONS) household projections to demonstrate that they over-estimate the number of new homes required. This analysis shows that the projected need for homes is c. 500 per year. However, there are also further questions over the ONS data that need professional demographic analysis to resolve, but which point to a lower need per year. For example, ONS overcrowding data has been updated showing the suppressed household formation is not as bad in Guildford as expected, migration projections based off 5-years cause the recent increase in overseas students to be projected forward contrary to the University's expectations, etc.

Similarly, the Guildford Residents' Association and Guildford Greenbelt Group show that excluding the effect of student population change completely results in a more accurate prediction of the true needs of the Borough. The migration-led ten year figure of 470 homes per annum is considered a much more robust starting point for the analysis, as it is relatively less affected by the isolated high-growth in student numbers from 2008-11. A proper and robust analysis of demographic drivers is expected to reduce the true need from the "raw" starting point of 470 to a figure around 400.

Economic Growth and Employment

The Guildford Society response to the Draft SHMA takes account of employment growth and shows the need arising from employment to be 463 homes. Given the constraints, we consider the Local Plan needs to improve Guildford's transportation hubs to ensure in-commuters can easily access places of employment so as to ensure that the economy is not restricted by the housing constraints.



Affordable Housing Need

Care needs to be taken in translating a register of demand for affordable homes into an annual need figure. The Save Hogs Back Campaign contend that affordable need is accommodated within the overall figures we propose. Using data from the 2014 draft SHMA, it can be shown that the affordable need is between 170 and 257 pa. This is based on GBC's current assumptions that 35% of income is the maximum that can be spent on housing and that the maximum affordable rental should be 70% of the market value, and also assumes that GBC will continue to make use of the private rented sector.

Methodology, Assumptions and Sensitivity Testing

Local circumstances can lead a Local Authority to adopt a methodology that is appropriate to its area and to undertake sensitivity testing of assumptions based on the underlying demographic projections. The National Planning Practice Guidance recognises preparing a SHMA to assess housing needs is "not an exact science" and the House of Commons Library has made clear that the "Government does not want to lay down in detail the method of calculating housing need", except that this must be based upon evidence.

Given Guildford's unique combination of characteristics (a highly interconnected town with its own high value economy, student population and proximity to London) it is reasonable for GBC to ensure evidence properly assesses housing need for Guildford Borough rather than rigidly following one standard methodology. GBC should use the provisions in the NPPG to ensure the methodology and assumptions in the need assessment are appropriate for Guildford as well as being robust.

Taking the different approaches together, the groups agree that a SHMA properly reflecting Guildford Borough is in the region of 450 per year.

Built Housing Targets

GBC does not need to make any adjustment for historic under performance. As noted by GL Hearn (p27 paragraph 2.44), housing delivery totalled 3187 homes in the Borough compared to planned housing provision of 3180 homes. In the period preceding the demographic projections in this report (which start from 2011) there was thus no shortfall in housing provision.

Clearly the significant constraints in the Borough need to be taken into account when determining the target for homes to be completed per year. These constraints are well known and include:

- National landscape designations such as AONB and potential AONB
- International and national biodiversity protection including the Thames Basin Heaths SPA, SACs, National Nature Reserves, SSSIs,
- Ancient woodland and Sites of Nature Conservation Importance
- Ancient monuments, National Trust properties, historic gardens and other archaeological sites and built heritage of importance (eg Conservation Areas)
- Metropolitan Green Belt
- Topography of a gap town with a river, rail and roads running through it
- Floodplain, waterways, Wey Navigation & protection of aquifer water sources
- Ministry of Defence Land
- Registered commons
- Provision for critical infrastructure (water supply, power, sanitation, waste) including safeguarded sites
- Strategic agricultural land for farming



Once these constraints are overlaid, this reduces the ability to fulfil unconstrained identified need to the region of 300-345. In reality, it will be a challenge to identify sufficient land to meet this annual target. However, we believe a figure in the order of 300 can be met and potentially exceeded periodically with a visionary and creative partnership between the Council, other authorities and other partners. This will allow us to meet the social and economic obligations of the Borough without harming the value of our countryside and built environment.

Comparison with other authorities

Whilst not a formal step in the Local Plan process, it is well worth comparing Guildford's targets with those of other neighbouring authorities. Those with agreed targets include:

Epsom 181

Tandridge 125

Spelthorne 166

Mole Valley 188

Surrey Heath 190

Rushmoor 374 (includes a major brownfield opportunity)

Elmbridge 225

Woking 292

This benchmarking demonstrates that a target for GBC of 300-345 is in line with other neighbouring authorities and demonstrates to the public that Guildford is delivering its "fair share" of housing.

April 2014