



WEST CLANDON PARISH COUNCIL

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Draft Strategic Housing Market Assessment Consultation Response

It has been stated repeatedly by representatives of Guildford Borough Council (GBC) that the evidence base is critical to the formulation of the Local Plan and that without such a plan the Borough would be under pressure to allow all "sustainable" development, even development that GBC did not want. The SHMA is probably the most critical element of the evidence base as it will lead to the determination of the scale of housing development in the Borough for the next 20 years. The PC fully understands that the conclusions of the SHMA are the starting point for determining the housing number in the Local Plan and not the final number. Clearly the GL Hearn SHMA will carry great weight with an inspector because it was specifically commissioned by GBC and is the most recent assessment. The Parish Council is also led to understand from GBC representatives that further work will be done to assess what could realistically be delivered. This latter determination is obviously easier, the lower the starting point. It is therefore of the utmost importance that the starting number is based on need which is realistic, robust and determined by a transparent process.

West Clandon Parish Council is concerned that the GL Hearn report does not seem to meet these criteria in many respects. The Parish Council does not have the resources or the expertise to do the necessary critical appraisal of the SHMA but we urge GBC to carry out such a review before the SHMA is admitted to the evidence base.

The Parish Council has noted the following points about the SHMA which give rise to concern.

Is The Number Realistic?

The SHMA concludes that GBC should use 800 homes per annum as the starting point (in fact several further unquantified suggestions are made which would increase this figure if adopted). GBC's working figure is 322, the defeated South East Plan had a target of 422 and the 2009 SHMA figure was around 640- increases of 148%, 90% and 25% respectively. Clearly something must have changed dramatically if these figures were justifiable in their own time. The number of 800 implies that the past is no guide to the future and that there is a crisis in GBC current housing provision and/or that a very significant increase in housing need is predictable. According to Table 19, half of all households are unable to afford market rate housing. The evidence is not presented in the report and it certainly does not align with experience.

Is The Number Robust?

The SHMA uses the last 5 years to project demographic changes. This is only justified if there is evidence that this period is typical or not distorted. In fact it is badly distorted by student numbers. Most students will not end up living and/or working in the GBC area. The demographic changes predicted are thus not sound and hence any housing number based on them is also not sound.

It seems inherently unlikely that each new job equates to a need for one new home. The report itself shows that approximately 50% of the current work force commutes in. No evidence is presented that this is likely to change significantly.

Many of those who will come to live in Guildford and take up employment, will live in households with two or even more people in employment. On this basis the employment-based housing requirement given in the draft SHMA is significantly too high.

The employment growth proposed is high in historical terms without justification. Both the public sector and retail are significant employers in the area and for good reasons employment is expected to reduce in both.

The draft SHMA incorporates further factors in supporting the proposal that 800 dwellings per annum is an appropriate target. One of these is that to increase the supply of dwellings would “support improvements in affordability”. Where is the basis in either the NPPF or NPPG for this? In what circumstances would it be appropriate for GBC to conduct what amounts to an experiment in national planning policy using the scarce, geographically constrained land in the borough? This is considered a completely inappropriate basis to increase the number of dwellings required per annum.

Mention is made of consultation with other areas and that this may increase the target dwellings per annum still further to accommodate unmet need in adjoining authorities. Firstly, their targets appear to be lower than that proposed for GBC and secondly no mention is made of reducing the GBC target by such authorities taking on need in Guildford.

Is The Process Transparent?

For consultation to be meaningful, the report needs to be clear about how conclusions have been reached and the evidence on which they are based. In a number of cases figures and trends are cited from other work and then subjected to unspecified and apparently unwarranted adjustments without clearly stated justification. It is striking that in almost all cases upwards adjustments are made.

Significant conclusions in the SHMA appear to be founded on assertion or data that is unverifiable to consultees. Doubtless, G L Hearn has developed its own methods and processes but these need to be available for scrutiny, given the far-reaching consequences of the conclusions.

The consultation period is very short for such a complex and critically important part of the evidence base that requires detailed understanding and analysis prior to discussion and decisions on the responses.

West Clandon Parish Council

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