

Guildford Greenbelt Group (GGG)
Press announcement 20 December 2014

**GUILDFORD GREENBELT GROUP (GGG) INITIAL RESPONSE TO COMBINED
DRAFT HOUSING NUMBERS**

Guildford Greenbelt Group (GGG) notes that the combined draft Strategic Housing Market Assessment (SHMA) for Guildford, Woking and Waverley was published late on 18 December 2014.

This document, like the previous draft SHMA published in May 2014, and the draft published in January 2014, was produced by GL Hearn.

The proposed housing number for Guildford is a range of **620-816** homes per year.

GGG will study the new SHMA in detail and will produce detailed comments in due course. However, there are some preliminary observations we feel able to make:

- GL Hearn has noted that certain of the criticisms made about its previous drafts and calculations are valid
- GGG has formally requested a copy of GL Hearn's model (as used previously), in order to assess and check the formal calculations and assumptions made. This has been refused by Guildford Borough Council, despite a formal freedom of information request (even though, unless the method can be reviewed and replicated, an inspector should deem the conclusions invalid).
- It is worth noting that GL Hearn has expertise in advising developers on how to achieve their objectives, and this is the main focus of its practice. Why did Guildford Borough Council choose - repeatedly - to use a consultant with such a strong pro-development focus? (*see notes*).
- Despite certain previous criticisms being accepted as valid, the range of housing need given for Guildford is similar to that proposed previously, with an actual increase in "objectively assessed housing need" (OAN) for the area. Previously objectively assessed housing need was considered to be 652, with a suggestion that Guildford should "test" a possible increase to 780 (ie a previous range of 652-780); now GL Hearn asserts that the actual objectively assessed housing need for Guildford is 820 homes per year.
- This arises because GL Hearn's assertion is that the population of Guildford will grow at a significantly higher rate than England as a whole or even than the South East – population growth in Guildford is predicted to be 17.2% compared with 11.7% in Woking .
- GL Hearn states that growth due to increased economic activity in Guildford will be the cause for a significant proportion of new housing and it inflates the housing number accordingly.

- Guildford is stated as likely to achieve economic growth which is significantly above average even within the housing market area, and higher than anticipated in the South East as a whole. This development strategy drives a significant element of the housing need assessment; but this strategy has itself never been approved or subject to local consultation.
- Around 50% of the expected increase in the student population in Guildford (a further 6300 students) will be expected to be housed off campus; there is no expectation of a reduction in the proportion of students currently housed in the town (as has been required by other university towns).
- It is acknowledged that there will be constraints applied to the calculation of objectively assessed housing need which will include infrastructure and the greenbelt, together with Area of Outstanding Natural Beauty (AONB) and the Thames Basin Heath Special Protection Area (SPA).
- GL Hearn has applied a higher uplift to housing need in Guildford to increase “affordability” than in either Woking or Waverley, which is apparently because it has a “larger younger population” (ignoring the fact that this is due to the student population).
- There has not yet been any adjustment for housing need in relation to impact of existing planning permissions, windfall sites and the housing of more current students on the university campus, all of which have been required by ministerial guidance.

Susan Parker, chair of GGG commented:

“The Guildford number for housing need is too high – it has been increased. When the required constraints are applied, we are likely to find ourselves with the same housing projections and proposals as put forward last summer.

The Council has claimed repeatedly that it will challenge the housing number, but it is campaign groups and the community, not the Council, that has challenged and questioned its conclusions at every stage. The Council has merely put development consultants’ reports forward as a justification for the proposed plan.

It is worth noting that in 2011 the Guildford Conservatives pledged to protect the greenbelt & countryside as a key element in their election manifesto, which led to their election. That pledge was not honoured. The draft Local Plan, put forward by our local Council, broke that promise.

We have now been told that the Local Plan will be reviewed by the Council, and a revised Local Plan will be available after the next election. The housing numbers have increased and the Council have not challenged the arguments

made, although they have had this report in draft since September. The Council chose to publish this report a few days before Christmas perhaps so no one would read it. Why should anyone trust them now?"

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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.”