

Dear Councillor,

There is so much at stake for Guildford that it is absolutely essential that the housing figure in the Draft Local Plan is assessed correctly. We therefore ask you, in view of the anomalies listed below, to address the concerns of your constituents and oppose the adoption of the 652 figure.

ANOMALIES

The assertion that there has been a persistent under-provision of housing is incorrect.

Figures produced by GBC's own consultants clearly show that "over the 2001-2011 decade housing delivery totalled 3187 in the Borough relative to a planned housing delivery of 3180".

Student numbers have been used to inflate housing forecasts.

While student numbers have been used to determine the housing need, numerous planning consents for as yet un-built student accommodation have been excluded from this assessment.

The use of 5 years data is incorrect.

The reliance on 5 years, rather than 10 years, of historical data, resulting in housing forecasts based on an unusual increase in student numbers, is, according to the consultants Edge Analytics, "not recommended, particularly given the evidence suggested by the 10 year migration history".

The population forecasts used are incorrect.

The Office of National Statistics has recently revised the projected 2021 population for Guildford downwards by almost 5,000 which will have a significant effect on reducing housing demand.

Ministerial guidance has been ignored.

Ministerial guidance from Nick Boles and recent planning guidance makes it clear that "un-met housing need" is not in itself justification for encroachment into the Green Belt.

Infrastructure needs have been ignored.

Since the Draft Local Plan does not suggest how the existing deficiencies in infrastructure can be resolved, are you confident that the existing infrastructure, which is barely able to cope with existing demands, will be able to cope with an additional 652 houses per annum?

The housing target is wildly in excess of that adopted by similar boroughs.

How is it possible that the neighbouring borough of Elmbridge, with a similar population and a similar number of households, has an annual housing target of only 225?