

Speech to the GBC Executive Committee on June 4 2014 by Graham Hibbert on behalf of the GRA.

Chair, Councillors and Officers, GRA members are concerned by the lack of transparency on crucial matters in the Draft Local Plan and puzzled why the Council is not taking advantage of the flexibility the government's rules provide.

First, in Appendix 4b of the papers before you today, why is the NPPG guidance for assessing historic housing delivery performance stated but then ignored? Why **not** judge Guildford's performance over a longer period, including both peaks and troughs in the delivery cycle, as the NPPG recommends? GL Hearn followed this approach in its SHMA and judged that there was **no** shortfall in historic delivery. Is it because the Council prefers citing a "significant backlog of unmet need" to justify the proposed doubling of the housing target rather than talking about coping with projected increases in migration, as predicted in the SHMA?

Secondly, Appendix 4b gives no transparent analysis of how GL Hearn arrived at its housing target number and of Edge Analytics' alternative approach. The difference between the two firms' conclusions is huge; some 4000 too many dwellings could be built. Again, projected migration numbers seem key to the differing conclusions of the two firms. Edge Analytics propose a much lower housing target for the borough. Their concern about basing longer term housing projections on unreliable migration numbers is vindicated by the most recent revision to the ONS statistics. Yet the Council prefers to stick with the higher GL Hearn housing proposal without clear justification.

So the approach in this and other matters is not yet transparent, and the flexibility offered by government rules is seemingly not being used. Councillors appear to be judging that proposing a 25% increase in the number of dwellings in the borough – seemingly without firm and adequate infrastructure support - is justified by the urgent need to get a Local Plan in place as soon as possible.

That is now clearly looking like the Council's own choice and not one imposed by government. Residents have to judge if they support the rapid submission of this seemingly unbalanced Plan or if the risks it poses to the character of our town and countryside and the future success of our borough, are too great. The GRA strongly believes we need a more balanced plan.

I am happy to take questions on the details I have quoted.

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