

SHMA is Not realistic or Proportionate

1st slide

Madam Mayor, Councillors

We understand you're in a difficult position. Mr Mansbridge told us in his letters to the Surrey Ad and elsewhere. But this council has shown courage and integrity before and we need you to show it now.

In 2010 you contested the SE Plan, taking High Court action to fight the housing target of 422. Councillor Wicks said that housing target would have "*prejudiced the character of the borough*".

We've had 4 years minimal growth. Now, this almost doubles the number you rejected. Constraints may be applied– but we need to get the housing *need* right, not rely on *constraints* to get it down – these may not be allowed by an inspector.

Just to avoid you telling us that we need affordable houses, or a local plan and a SHMA which must meet the requirements of NPPF and NPPG, let me say we accept this (and broadly points 1-5 on the motion – although do note 5 year supply is a local plan, not a SHMA, matter). **We feel that points 6 and 7 are wrong and so ask you to oppose the motion.**

In turn you must accept that under the NPPF and NPPG the SHMA must be objective, proportionate and realistic. This SHMA needs radical not minor revision.

This SHMA is not **proportionate**. 800 homes a year backdated to 2011 gives 16000 homes - an increase of about 30%. ONS predicts the UK population to grow 11% by 2027.

The SHMA is not **realistic**, It distorts information. Our largest population group - eight per cent. – are 20-24 year olds, mostly students, who leave. Students from overseas don't have leave to remain in the UK, but inflate this housing projection.

Student homes should be part of the housing assessment –they're not either. Existing planning permissions should be deducted–
2400

student residences for UNiS, 400 homes in Ash. Vacant homes should be deducted. Neither is.

Most constraints apply later, but NPPG requires review of local – including *geographical* - constraints now. You know what applies - gap town, flood plain, commuters, university..

This SHMA is not **objective**; some think it designed to inflate numbers. Let me quote:

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Surrey Hills AONB:

“There can be a tendency just to accept consultants’ SHMAs because of their complexity.....it does appear that the recommended figure of 800 additional homes ...has been unjustifiably inflated and the assessment is not as robust as the consultants claim. “

Guildford Soc, *“We have reviewed very carefully the content, context, methodology and findings of the draft SHMA and have concluded that it is based on unexplained and/or unsound data”*

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CPRE... *“there is a background of external pressure for growth which encourages the housing need figure to be overstated.. it is essential that an objective assessment is made now of how this figure was calculated, and ..whether the apparent subjective decisions to ratchet up the total are really realistic... Much of the basic data is unreliable.”*

GRA *“G L Hearn preferentially select projections based on the most recent five years yet ignore major distorting factors which need to be understood and corrected for..”*

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You have a **duty to cooperate** with other local authorities in a housing market area. A workshop doesn't count. This SHMA doesn't meet that duty and so may fail an inspection. Get it right now, and

you can proceed with the local plan with – say - a delay of 2 months - which you need anyway to correct the evidence base. OR you waste 2 years of your time and our money.

The Waverley Inspector said in June 2013 “ *an evidence base that solely*

refers to demographic and other changes within Waverley Borough, without consideration of the market area as a whole, is unlikely to be sufficient”.

Then GL Hearn prepared a study of just Waverley Borough. Now Waverley are starting their process again.

I don't think that councillors have received the best advice. Council officers wouldn't give you our comments on the SHMA. Some have been sent to you directly.

You cannot ignore these - an inspector will not. You need to ensure the SHMA is fundamentally re-worked ensuring that it meets all requirements, and is objective, proportionate and realistic.

Please vote to reflect the concerns of the people of Guildford and oppose the formal motion.

Two months now – or two years wasted.

Thank you.