

The Inspector
Mr Jonathan Bore
c/o Programme Officer
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Dear Mr Bore

STATEMENT OF BARRATT DAVID WILSON – SOUTHERN COUNTIES ON THE IMPLICATIONS OF THE 2016 HOUSEHOLD PROJECTIONS AND THE PLAN'S HOUSING REQUIREMENT GUILDFORD BOROUGH COUNCIL LOCAL PLAN - RESUMED HEARINGS - 12TH AND 13TH FEBRUARY 2019

Land west of Alderton's Farm, Send Marsh Road, Send – Site 29 Policy A63

This letter is prepared in response to the Inspector's Note ID/12 requesting changes and consequences affecting sites in the Main Modifications; Resumed Hearings on 12th/13th February 2019.

Barratt Developments plc is the Country's leading house builder by volume, incorporating the brands Barratt and David Wilson Homes. Barratt David Wilson – Southern Counties (BDW) has consistently promoted Alderton's Farm, Send, as a robust, controlled and deliverable Site through the Local Plan process.

The Site extends to 6.35ha, and has its own adjoining 14.3ha SANG parcel that will benefit both the future residents of the Site, as well as the existing surrounding community. Accordingly, the Site can provide circa 120 dwellings as part of Guildford Borough's housing trajectory within the first 5 years of the Plan period.

Main Modifications to the Local Plan

We respectfully request that you consider BDW's previous Representations to the Examination in your decision-making. In particular, our Representations to the Main Modifications, which supported the delivery of the Site known as Alderton's Farm for housing.

BDW consider that for the Local Plan to be found Sound, the Main Modifications must be applied.

The whole purpose of the 2018 Summer Examination into the Local Plan, and the Interim Conclusions, led to the publication of the Main Modifications by the Council. The Site has already been judged by Guildford BC to be suitable for release from the Green Belt, and evidence was prepared to support this position. Nothing has been published which challenges this by the Council.

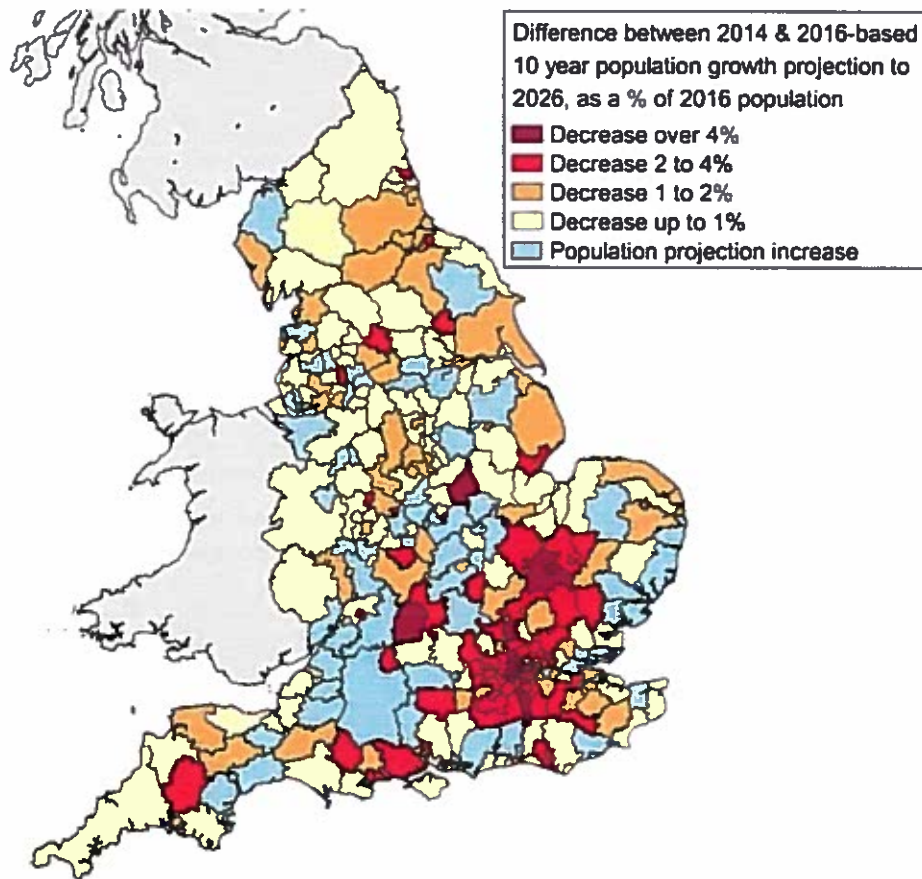
The recent decision by Guildford BC to Adopt the 2016 Household Projections in its OAN calculation and the resultant impact on the Allocation of sites is of great concern. This is because the proposed reduction in Allocated sites for housing goes against the Government's drive to have 300,000 housing completions per year, nationally. Guildford BC must continue to plan positively and proactively to help achieve this target. In particular, the additional sites proposed by the Main Modifications, would increase delivery in the first 5 years of the Plan, and therefore addressing the serious and urgent need for housing within the Borough.

The problems with 2016 ONS population projections

The 2016 population/ household projections are based on lower birth rates and lower life expectancy, as well as reduced international immigration figures that have resulted in a set of projections that are substantially lower than those produced just two years earlier. These also do not explicitly take account of the long-term trend for declining household size.

Research by Savills in September 2018 demonstrated that the decrease between 2014 and 2016 projections exceeds 2% of population across most of London, the Home Counties and parts of the South East – all locations where housing affordability is most stretched and housing need at its greatest. The implications of the 2014 versus 2016 projections are shown by the Map below.

The application of 2016 projections will do nothing to achieve the Government's objective of 300,000 homes per year across England; indeed, it would result in a figure closer to 220,000. This is not positive planning.



Source for the above Map: Savills (September 2018) – using ONS Data

Savills provided a policy response in September 2018 outlining an alternative method for calculating housing need, which we have enclosed with this letter. Whilst BDW accepts that the Guildford Borough Local Plan should be based on relevant evidence of Housing needs (as outlined in the SHMA and revisions to it), the baseline evidence outlined in the Savills report is a relevant consideration. Notably:

- Guildford Borough as one of the least affordable Districts in a national context;
- Delivery in Guildford Borough should be above 1.8% of existing stock, per annum, to genuinely tackle affordability (equating to circa 1,000 homes per annum)
- Use of 2014 projections more accurately reflects long term trends in demographics and household size
- The resultant application of 2016 projections risk the delivery of homes nationally falling below 1% of existing stock – if applied nationally.

All of which is plainly incompatible with 300,000 homes per annum, and thus it is our view that GBC must be doing its fair part.

Clearly, the Government consultation of December on calculating the Standard Methodology (<https://www.gov.uk/government/consultations/changes-to-planning-policy-and-guidance-including-the-standard-method-for-assessing-local-housing-need>) made clear their proposal

to place ongoing reliance on 2014 Projections. The anomaly with this consultation was the absence of guidance on 'transitional arrangements' (for plans such as GBC's emerging local plan). This is regrettable. It is however, BDW's view that the correct evidence base must still be used in order to achieve NPPF and Government objectives to significantly boost housing supply. The Government has signalled its intention for the evidence to be the 2014 projections until such as time as new evidence is available, which must be given weight in the context of assessing a plan produced under the transitional arrangements.

What is Needed to Make the Plan Sound

The Main Modifications to the Local Plan must therefore apply so that the whole process is robust, proactive and ensures the delivery of housing in accordance with the Government's overarching aim.

Following the successful Residential Allocation of the Site in the Adopted Local Plan, BDW will make a Detailed Planning Application to the Council, and will commence both housing development and the delivery of the SANG land at the first opportunity, post successful Planning Consent for the 120 dwellings, 40% of which will be affordable homes; thereby speeding up delivery of finished dwellings on the Site.

Prompt Delivery of Alderton's Farm

In order to achieve the above, BDW would seek to commence pre-application discussions with the Council at the earliest opportunity, and are currently liaising closely with the Site's Landowners to ensure that the early delivery of the Site can be achieved swiftly, following the Site's residential Allocation.

BDW has undertaken site-specific assessment for Ecology, Transport, Landscape and Heritage, all of which have informed our Masterplan for the Site. There are no Technical issues that will prevent development of the Site and there are no legal or occupancy issues to delay implementation of a successful Planning consent for the Site's residential development.

In terms of delivery programme, BDW envisages that First occupations could occur within a matter of 18 months, following the submission of a Detailed Planning Application, as outlined in the Indicative Programme below:

- Day 1 - Submission of Detailed Planning Application for circa 120 dwellings, and the 14.3Ha of accompanying SANG land which adjoins the Site to the West;
- Month 7 – Signing of the s106 Legal Agreement, and the issuing of the Planning Consent by the Council;
- Months 7 – 11 Legal completion of the Site, and submission to the Council of the information to speedily clear the Planning Conditions;
- Month 12 - Start of Housing Construction on site, Infrastructure, Services, etc.;
- Months 15/16 – The laying out and completion of the SANG land;



- Month 18 - First Legal occupations on Site; and
- Month 48 - Final completion on Site

BDW originally provided the above Programme as part of Representations to the Main Modifications Consultation in October 2018, and it remains relevant for housing delivery from the Local Plan's Adoption.

The delay in the Local Plan's Adoption timetable will result in these dwellings coming forward around 6 months later than originally envisaged by BDW.

BDW very much hope that you will consider and take on board the contents of this letter, and thank you again for the opportunity to offer comment on this matter.

Yours sincerely



fP **Giuseppe Zanre**
Regional Strategic Land Director – Southern
For and on behalf of Barratt David Wilson Homes – Southern Counties