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# Examination Statement

## Prepared by Savills on behalf of Taylor Wimpey UK Limited

Guildford Borough Council Development Management  
Plan Examination in Public – **Matter 2 Policy H8: First  
Homes**

Regulation 19 Comment ID: LPDM21B/262

October 2022

# 1. Introduction

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- 1.1. This Examination Statement in regard to the Guildford Borough Council Development Management Policies (GBC DMP) has been prepared by Savills on behalf of Taylor Wimpey UK Limited (TW), who own land at Former Wisley Airfield (FWA). TW is broadly supportive of the Draft GBC DMP, however feel some further refinements need to be made in order to ensure that the Plan is sound.
- 1.2. A Hybrid planning application has been submitted at FWA (ref: 22/P/01175), for a residential-led mixed use development of the strategic site, allocated by Policy A35 of the Guildford Borough Local Plan (“GBLP”) Strategy and Sites 2015-2034 (adopted 2019). TW, in collaboration with Hallam and CBRE, are proposing one settlement, which comprises three neighbourhoods. The full application description and application document are available on the council's website.
- 1.3. TW’s representation to Guildford Borough Council (GBC) Regulation 19 DMP consultation (relevant to this matter) has been given the following reference Policy H8: First Homes, comment ID: LPDM21B/262. **On this Matter, TW has not registered to appear at the Hearing. Rather, this Statement has been prepared to amplify the Regulation 19 representations made.**

## 2. Response to Inspector's Matters and Questions

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### Matter 2: First Homes

#### **Main Question: Whether Policy H8: First Homes is positively prepared, justified, effective and consistent with both national policy and the LPSS.**

2.1. No, in its present form the policy is not effective or positively prepared. A review mechanism has not been added to the policy in respect of actual take up of First Homes, and no flexibility has been added to encourage an appropriate type/ tenure of First Homes within the onward phases of affordable homes.

2.2. It is suggested that paragraph 2.47 is updated to include additional text:

*"...For major strategic sites allocated in the LPSS, following the first phase(s) of delivery, GBC will seek to negotiate a review mechanism in respect of the actual take up of First Homes, and where demand is notably absent, may seek a flexible approach to be undertaken re: type/ tenure of onward phases of affordable homes.."*

2.3. Alternatively, or in addition, the suggested text could more suitably form a new criterion 7. of the policy itself.

2.4. TW support the principle of First Homes, however feel these changes are required in order to ensure that demand is best responded to and to make the policy effective over the plan period. TW have made specific comments on these points within their Regulation 19 Representation in paragraphs 3.8-3.10.

#### **Supplementary Questions:**

##### 2.1 The Government's First Homes policy was introduced after the adoption of the LPSS. What are the implications for Guildford Borough and the affordable housing split set out in LPSS Policy H2(4)?

2.5. The allocations made in the Guildford Local Plan and Strategic Sites (LPSS) were adopted on the basis of Policy H2(4). Any new policy introduced in the 'daughter document' DMP needs to be considered against the 'parent document' LPSS. This includes any impact a new policy, including on viability grounds, would have on the allocations made which need to be delivered throughout the plan period.

2.6. For example, FWA is an allocated, strategic site including 2,000 new homes, thus this new policy could

have significant impacts on the housing mix. See TW's comments to question 2.2. below. The overriding imperative should be to retain 40% affordable provision, however this is defined, whilst allowing for flexibility in the policy to enable the plan to be effective, in respect of changing circumstances, for example the actual take-up of First Homes. The GBLP does include some flexibility in respect of affordable housing provision, and in practice on the overall housing mix, in light of the SHMA being used as starting point.

2.2 In the case of Guildford Borough, will the policy lead to the loss of shared ownership properties, an excess of 1-bedroom properties or any other adverse consequences? If so, should there be scope for some flexibility over the requirement for 25% of affordable homes to be First Homes?

- 2.7. Yes, the policy as worded would lead to the loss of shared ownership properties and an excess of one bedroom properties. As per paragraph 2.47 of the GBC DMP, all of the initial sales after discount must be under £250,000. This issue is exacerbated for strategic sites. As an example, the Hybrid Application submitted by TW at FWA is for 1,730 units, it is not known whether there will be the demand for 173 one bedroom units as First Homes. Taking into account the full allocation, the number of 1 beds would be 200 units. There should be a way (i.e. a review mechanism) to vary the percentage of one beds on future phases and increase the number of two-three bed units in lieu of First Homes. This could also help to resolve the issue of loss of shared ownership as a demand appropriate mix of tenures would be delivered on site, based on the outcome of the review mechanism. The specific circumstances, of the major strategic sites allocated in the GBLP should be factored, to ensure a sufficiently flexible and hence effective policy. This would be entirely consistent with the GBLP, which itself includes some flexibility on affordable housing provision (i.e. on viability), to allow for site specific negotiation through Section 106 Agreements.
- 2.8. In general terms, whilst not specifically related to the FWA, the higher discounts on First Homes, could lead to viability pressures on schemes and lead to the delivery of smaller products, thus resulting in a smaller range of affordable housing products within GBC. To be clear, in stating this, TW's proposition at the FWA is for 40% provision of affordable housing, consistent with present policy.

[REDACTED]  
Director  
[REDACTED]