



# THAKEHAM

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10<sup>th</sup> May 2018

**Re: Examination Statement in respect of Land to the rear of Greenhill and Burnside, Chinthurst Lane, Shalford on behalf of Thakeham Homes Ltd  
Guildford Local Plan Examination  
Representation Reference number: 11659905**

## 1.0 Introduction

- 1.1 Thakeham Homes Ltd ('Thakeham') are members of the Guildford Housing Forum ('the Forum'), therefore representations on matters 2, 3, 4 and 5, made by the Forum are fully supported by Thakeham.
- 1.2 In addition to the Forum responses, Thakeham have a number of interests across the Borough for which statements have been produced. We have endeavoured to avoid duplication within these statements, therefore they should be read in conjunction with one another to provide a comprehensive response from Thakeham on matters raised by the Inspector.
- 1.3 This statement therefore only provides a response to relevant questions (Matters 9.2, 9.6 & 9.7) raised by the Inspector (dated 20<sup>th</sup> April 2018) which are not covered by the Forum or additional Thakeham responses, and are submitted in respect of Land to the rear of Greenhill and Burnside, Chinthurst Lane, Shalford.

## 2.0 Spatial Strategy, Green Belt and Country Protection (Matter 9)

Matter 9.2: Having regard to the need for housing, does the plan direct it strategically to the right places? – Green Belt and Landscape Impact

- 2.1 As indicated in other statements, Thakeham has concerns over the lack of consistency in the application of landscape impacts of developments. In the case of Land to rear of Greenhill and Burnside, Chinthurst Lane, Shalford an example would be how it has been assessed in the Council's Assessment of Sites for Amenity Value 2017 and how this has informed its designation as 'Open Space'.
- 2.2 The councils Assessment of Sites for Amenity Value 2017 ('Amenity Assessment 2017') deemed the site (Ref: ETH\_088) had an amenity value score of 'High' accompanied by commentary stating that:

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*‘Site is a grass field which is inaccessible to the public. The site is adjacent to a private sports centre. There is also a PRow along the southern boundary. The site is in an elevated position and offers aesthetic value.’*

2.3 This has been discussed in further detail in our previous representations where accompanying photographs were also provided. However, to summarise, as per the council’s assessment, the site is private land which is inaccessible to the public. The site only appears to have received an amenity value of ‘high’ as a result of its ‘aesthetic value’. This conclusion is flawed; the site’s elevated position is such that it is only visible from the public realm in views from Chinthurst Lane and from longer distances. Its aesthetic value is, therefore, limited.

2.4 Guildford Borough Councils updated Land Availability Assessment 2017 (LAA) assesses the site for suitability for residential development (Site Reference 1264) stating that *‘There is no known reason why well designed new homes in this location, that take account of the amenities of the neighbouring properties, should have an unacceptable impact.’* In addition, when considering the site’s possible uses the Council have concluded that *‘This site is most suitable for residential development, to provide new homes to help meet the identified need.’* However, following the Amenity Assessment 2017, the council has maintained the proposed designation of the site as ‘Open Space’ under Policy ID4: Green and Blue infrastructure.

2.5 In this regard, the NPPF defines Open Space as:

*‘All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.’*

2.6 The site does not perform the functions required by the NPPF; it offers no opportunities for sport and recreation and provides limited visual amenity. As a result, we have concerns regarding the council’s Amenity Assessment 2017 and the soundness of this assessment as part of evidence base of the Local Plan, particularly in light of the council’s updated LAA. The designation of the site as ‘Open Space’ is considered unwarranted and unsound. This designation of the site as ‘Open Space’ restricts the delivery of residential development on a site that the council otherwise acknowledges as being suitable.

#### Matter 9.6: Does the plan take a sound approach towards the inseting of various villages from the Green Belt.

2.7 We support the Councils proposals to inset villages such as Shalford from the Green Belt. However as discussed above, we consider that the application of additional restrictive policies such as AGLV and Green Infrastructure within the settlement boundary, where these policies are unjustified, is an unsound approach. These policies prevent otherwise suitable sites within the settlement boundary from coming forward for residential development and making a positive contribution towards housing need.

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Matter 9.7: Taking into account the extent of housing, employment and other needs, does the plan take a sound approach towards the protection of the landscape, including the AONB and AGLV and the countryside generally?

- 2.9 The AGLV boundary encroaches inside the settlement boundary of Shalford. We do not consider that this is an appropriate use of AGLV policy, as there is no justification to support the application of this designation within settlements. Areas within the settlement boundary do not function as AGLV and accordingly should not be designated.