

FAO Chris Banks 64 Lavinia Way East Preston West Sussex BN16 1EF

10<sup>th</sup> May 2018

Re: Examination Statement in respect of Land east of Chinthurst Lane, Shalford on behalf of Thakeham Homes Ltd Guildford Local Plan Examination Representation Reference number: 17348225

#### 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) 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 east of Chinthurst Lane, Shalford.

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

2.1 RPS has provided a comprehensive response on behalf of Thakeham Homes in relation to Matter 9 (Reference ID: 17443617). In addition to the observations made by RPS, Thakeham wish to make the following responses in respect of Land east of Chinthurst Lane, Shalford.

Matter 9.2: Having regard to the need for housing, does the plan direct it strategically to the right places?

### Spatial Distribution

2.2 As indicated in the RPS statement the Council's current strategy (paragraph 4.1.6) is to focus growth towards the most sustainable settlements, including Guildford as the

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- principal location for development. After Guildford, development is proposed to urban areas followed by growth to the villages.
- 2.3 It is entirely appropriate to recognise that main settlements such as Guildford should be the focus for growth, however sustainable settlements such as Shalford could accommodate additional growth to make a significant contribution to housing need whilst increasing their vitality.
- 2.4 Shalford has the benefit of a railway station, providing regular public transport links, together with other local services and facilities. In emerging National policy there is a clear steer towards directing development to sustainable locations with good existing public transport links. This is evident in the draft NPPF (published March 2018) which makes it clear that 'significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes' (Paragraph 104).

## Green Belt and Landscape Impact

- 2.5 As indicated in Thakeham's other responses, as a largely Green Belt authority, Guildford needs to first consider the correct extent of need in the Borough so that it can make an informed assessment as to how much land is required to be released from the Green Belt. Failure to do so will result in an unsound strategy which does not balance the need for housing with the appropriate quantum of housing sites.
- 2.6 Paragraph 83 of the NPPF indicates that the Green Belt boundaries should only be amended in exceptional circumstances, through the preparation of the Local Plan. In terms of what qualifies as exceptional circumstances, Thakeham considers that the reasons expressed by the Council to justify the release of sites from the Green Belt is correct and exceptional circumstances do exist in Guildford.
- 2.7 In addition, the Draft NPPF (March 2018) makes it clear that 'where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport' (Paragraph 137).
- 2.8 As a result, the council should consider further sites around public transport hubs, at settlements such as Shalford, to ensure that the all options have been considered to deliver housing in accordance with the identified need, whilst directing development to sustainable locations.

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

2.9 In relation to Shalford, it is appropriate to inset the village from the Green Belt. Areas within the settlement boundary do not function as Green Belt and accordingly should not be designated.

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