



THAKEHAM

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

10th May 2018

**Re: Examination Statement in respect of Land at Manor Farm to the west of West Horsley on behalf of Thakeham Homes Ltd
Guildford Borough Local Plan Examination
Representation Reference number: 17976417**

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 6.3 & 6.8) raised by the Inspector (dated 20th April 2018) which are not covered by the Forum or additional Thakeham responses, and are submitted in respect of Land at Manor Farm to the west of West Horsley.

2.0 Site Allocation A38: Land at Manor Farm to the west of West Horsley

- 2.1 Land at Manor Farm to the west of West Horsley ('the site') is a proposed allocation for 135 residential dwellings under Policy A38 of the submission Local Plan.
- 2.2 As per previous representations, we fully support the allocation of the site for residential development. However as set out in our previous representations we do not consider that the overall quantum of development proposed has been established appropriately. In our view the current policy is overly restrictive in terms of quantum of development. In support of this, the draft NPPF (published March 2018) provides a clear steer towards making effective use of land; in particular paragraph 123, which states that planning policies should *'ensure that developments make optimal use of the potential of each site'*. As a result, it is important that the council ensures that allocated sites are delivering to their full potential to contribute towards market and affordable housing need in the Borough.

Thakeham House, Summers Place, Stane Street, Billingshurst, West Sussex, RH14 9GN

www.thakeham.com

2.3 In addition, Policy D4 of the submission Local Plan seeks to ensure appropriate density that make the most efficient use of the land whilst responding to local character and context. To ensure a sound approach, it is therefore important that the council ensure consistency across their policies and ensure that they are reflecting national policy and guidance in the efficient use of housing sites.

3.0 Matter 6: Homes for all

The provision of accessible homes (Matter 6.3)

3.1 Policy H1(3) stipulates requirements for accessible homes on housing sites. It is not considered that sufficient sound justification has been provided by the council to support policy requirements for 10% Building Regulations M4 (2) category 2 standard 'accessible and adaptable dwellings' and 5% of new homes meeting Building Regulations M4(3)(b) category 3 wheelchair user accessible dwellings standard.

3.2 Whilst we support the provision of policies to ensure housing size, type and tenure of homes required for different groups in the community are provided, Planning Practice Guidance is clear that evidence is required to demonstrate need and viability prior to implementing these standards.

3.3 The 2017 SHMA provides some justification regarding the need for accessible homes and indicates a projected increase in the number of people with a long-term health problem or disability, whilst also indicating a requirement for 8% of the housing need to cater for specialist housing for older persons, such as sheltered and extra care housing.

3.4 As above, whilst we generally support the delivery of residential units to meet the needs of the ageing population and those with health needs, there is little justification within the Council's evidence base to support the total level of 15% of properties as indicated in policy H1.

3.5 Whilst a need has been identified within the Borough, particularly for the needs of older people, there is little justification as to whether all sites would be suitable for this need depending on size, location and need within a particular area. For sites such as Land at Manor Farm to the west of West Horsley, 15% provision for accessible and adaptable dwellings may not be justified by need within the area.

Self-build and custom homes (Matter 6.8)

3.6 Policy H1(9) stipulates requirements for self-build and custom homes on housing sites. The policy requirement of 5% of units on development sites of over 100 homes or more to be made available for sale as self-build and custom housebuilding has not been justified by the council. As discussed above in regard to accessible units, need for self-build and custom homes needs to be justified within the council's evidence base to ensure a sound basis for any policy.

3.7 Site allocation A38 also includes a requirement for 'some self-build and custom house building plots'. As above, this requirement needs to be justified in the council's evidence base.

3.8 Unless appropriately justified, policy requirements for a proportion of self-build and custom housing plots on all sites is an unsound approach.